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**FINAL DRAFT**

ARTICLES

WHOSE IS THE IMAGE AND SUBSCRIPTION?: COMPARING  
THE TRUMP ADMINISTRATION'S & CATHOLIC CHURCH'S  
VISIONS FOR EVOLVING ARTIFICIAL INTELLIGENCE

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Abstract

This paper addresses legal and ethical questions surrounding the development of artificial intelligence (AI) and the regulatory environment in which it will evolve, asking somewhat provocatively in whose image AI will be shaped. It answers that question by highlighting the stark contrast between United States President Donald J. Trump's administration's approach to such technological advancement (as reflected in its Executive Orders and other policy steps) and the approaches suggested by the Catholic Church for responsible AI development (as described in various papal writings and statements, both recent and less so). In outlining these contrasts, the paper also

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places each perspective in a broader regulatory, legal, and policy framework so readers can better understand the thrust and principles on which each perspective rests, and it compares them to others considering such developmental framework questions. In the end, the authors suggest that appropriate, beneficial, and safe development will require a broader range of active participation than the limited, industry-insider innovator preferences seemingly built into the Trump AI Action Plan.

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## WHOSE IS THE IMAGE AND SUBSCRIPTION?: COMPARING THE TRUMP ADMINISTRATION’S & CATHOLIC CHURCH’S VISIONS FOR EVOLVING ARTIFICIAL INTELLIGENCE

GREGORY J. KRABACHER & JAMES P. FLYNN<sup>3</sup>

### INTRODUCTION

In the Gospel of Matthew, an inquirer asks Christ, “Tell us therefore, What thinkest thou? Is it lawful to give tribute unto Caesar, or not?”<sup>4</sup> Christ responds by asking the inquirer to look at the coin with which tribute is made; he then looks at that coin, “[a]nd he saith unto them, Whose is this image and superscription?”<sup>5</sup> Because the coin pre-existed the question, Christ turned the inquiry back onto the inquirer, noting that one could remain true to both Caesar and God by saying, “Render therefore unto Caesar the things which are Caesar’s; and unto God the things that are God’s,” words at which “they marveled, and left him, and went their way.”<sup>6</sup>

Now, with artificial intelligence (AI), the questions arise as to what it will look like, and to whose image of that future AI the world will subscribe. But, because AI is not yet fully formed and functioning, the clever answer of looking at the “coin” is not available, for that coin has yet to be cast. The world is, in fact, in the very process of casting what artificial intelligence will be. Indeed, as Henry Kissinger and his co-authors observed, “At every turn, humanity will have three primary options: confining AI, partnering with it, or deferring to it. These choices

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<sup>3</sup> The opinions expressed in this paper are those of the authors and do not necessarily reflect those of their respective institutions, employers, or clients. The authors wish to express their thanks to the *Notre Dame Journal On Emerging Technologies*, and all those who helped get this article to its final form, especially journal members Brendan McDonnell, JohnPaul Beckman, and Autumn Chassie, as well as their families and those who encouraged its authors, especially their colleague Frances Green, Esq.

<sup>4</sup> *Matthew* 22:17 (King James).

<sup>5</sup> *Id.* at 22:18–20.

<sup>6</sup> *Id.* at 22:21–22.

will define AI's application to specific tasks or domains, reflecting philosophical as well as practical dimensions."<sup>7</sup>

How should humanity answer these questions? That is the topic this article examines, as we have the benefit of two competing visions of how AI should evolve. These are visions now represented by two powerful people in two powerful positions in two powerful institutions, and the contrast is a remarkable way to highlight the ethical, socioeconomic, geopolitical, and legal stakes at play in this debate.

Donald J. Trump and his administration of the United States government, and Pope Leo XIV, newly elected leader of the Catholic Church, have staked out positions on AI regulation that reflect contrasting priorities and ethical frameworks, each of which are worth examining. The need to consider the former's position may seem more obvious to some readers than the need to consider the latter's. The Trump administration, backed by the global influence of the world's largest economy and most powerful military, is, as daily news reports remind all, energetically pursuing its vision for the future of AI through both domestic and international measures. Thus, both supporters and detractors are sitting up and paying close attention, as are the authors of this article.<sup>8</sup>

As for the latter, a reader of legal scholarship may rightly question why the specific perspective of the Catholic Church is worthy of review, particularly by non-Catholics and those who do not subscribe to any religious tradition. We submit that the Church's position has resonance and meaning not only for the world's approximately 1.4 billion Catholics.<sup>9</sup> Like other aspects of culture, religious doctrine provides a particular perspective on how one can begin to think about the really big

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<sup>7</sup> Henry A. Kissinger et al., *THE AGE OF AI AND OUR HUMAN FUTURE* 210 (2021).

<sup>8</sup> Indeed, as time marches on, the news cycle related to the Trump administration only seems to accelerate. For example, one news item arrived during the final stages of this article's pre-publication review, which adds another layer to the meaning of this article's title. As of the time of this writing, the U.S. Mint is considering casting a new one-dollar commemorative coin with the image of sitting President Donald J. Trump as part of the U.S. semiquincentennial celebration. See U.S. MINT, *Semiquincentennial Dollar Coin Media Kit*, U.S. DEP'T OF THE TREASURY, <https://www.usmint.gov/news/media-kit/semi-q-dollar-coin> (last visited Jan. 5, 2026). Honoring a sitting president on U.S. currency would be a first for this country. See Scott Horsley, *New Redesigned Coins Marking Nation's 250th Birthday Begin Circulating Today*, NPR (Jan. 5, 2026), <https://www.npr.org/2026/01/05/nx-s1-5660747/new-redesigned-coins-250th-anniversary>.

<sup>9</sup> Vatican News, *New Church Statistics Reveal Growing Catholic Population, Fewer Pastoral Workers*, VATICAN NEWS (Mar. 20, 2025), <https://www.vaticannews.va/en/vatican-city/news/2025-03/pontifical-yearbook-2025-priests-religious-statistics.html>.

questions: for example, what is the meaning of life and how should one live it? These moral and philosophical perspectives reach beyond what one can, today, demonstrate with empirical scientific evidence. They provide frameworks for consideration and further thinking by believers and non-believers alike. The same can be said for great works of secular literature, art, philosophy, and, yes, science too. Therefore, to the extent one agrees that any thought-provoking work can inform judgements and help set priorities, one can agree that literature that happens to take the form of religious doctrine can do the same. Indeed, as literature, the collection of published works by the Catholic Church is particularly rich, containing detailed analysis on a variety of topics bearing on the relationship between human intelligence and artificial intelligence.

Of course, for followers of the Catholic faith, this perspective is more than a mere suggestion, and it is written with that understanding. In this sense, when the Church speaks to its faithful, it does so with a similar sense of responsibility as does a government when enacting law. In each case, the author writes to instruct, and with the sincere intention that this instruction be followed, not merely considered. Call it “culture with consequences.” Indeed, it is no accident that religious philosophy supplies a ready moral guide that undergirds much of the secular legal framework in nearly every country worldwide.<sup>10</sup> Modern Western

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<sup>10</sup> Francis J. Powers, *Religion and the Law*, 1 CATH. U. L. REV. 115 (1951). As Powers noted:

Religion does have relevancy to law. Religion is a basic component of our legal blood stream. Its influence permeates the whole field of the law. The great concepts which form the framework of our law, both public and private, are essentially religious. Religious and moral ideas and ideals constitute the very soul of our legal inheritance.

... Acknowledging man's social nature, our laws have traditionally protected rights of association and communication of ideas. It recognizes that man has spiritual relationships and it respects his conscience. The very Constitution of this nation is not without religious inspiration. Implicit in it is a recognition of the philosophical truth that the State, whose proper object is the securing of the common temporal good, is limited by the inalienable rights of the human personality.

... The principles of separation of powers, judicial review, due process, equal protection and the provisions of the Constitution relating to habeas corpus, search and seizure and civil liberties are rooted in the natural law. It is in its implications a deeply spiritual document. Religiously inspired ideas also pervade our governmental and legal institutions. Ours is a government of laws. Our constitutions and legislative measures have been enacted through a representative process based on the rationality and freedom of man and upon the assumption that they know right from wrong and will strive earnestly for what is right. The judicial process is given substance and sanction by religion.

democracies, in particular, have been heavily influenced from their inception by the Judeo-Christian tradition, including the writings of the Catholic Church. This special relationship, both historical and contemporary, between Church and State on questions of ethical judgment, therefore, commands our attention, regardless of the orientation from which each may individually engage the text.

This article offers a comparative analysis of the contrasting perspectives of the Trump administration and the Catholic Church. It does so by outlining the Trump administration perspective (in Part I), the Church's evolving view (in Part II), and comparisons to be made between the two (in Part III).

## I. TRUMP ADMINISTRATION: MARKET-DRIVEN INNOVATION WITH MINIMAL REGULATION

The Trump administration's approach to AI emphasizes economic competitiveness and technological leadership, with limited regulatory oversight. This is seen by the Administration's approach to some core issues:

**Global Trade Strategy:** The administration has sought to dismantle export restrictions on AI technologies, particularly to China, arguing that such curbs have hindered U.S. companies like Nvidia and have been ineffective in slowing China's technological advancements. Instead, the administration proposes a global licensing system to enhance U.S. influence in international trade negotiations.<sup>11</sup>

**International Deals:** President Trump has secured multi-billion-dollar AI deals with Gulf states, including Saudi Arabia and the UAE, involving the export of advanced AI chips and the

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Religion and morality give to law its ultimate sanction. And our legal system badly is in need of high moral inspiration and sanction. Judicial administration is seriously handicapped by unconscionable conduct by litigants and advocates alike. This is no idle charge. Jurists in increasing numbers are warning us that the entire judicial process is being undermined seriously by perjury on the part of parties and witnesses and the subornation of perjury by lawyers. The sanctity of the oath is vital to the administration of justice. Fear of the penalties of perjury is an inadequate sanction to preserve the integrity of the judicial process.

<sup>11</sup> Cherney & Wen-Yee Lee, *Nvidia CEO Praises Trump Move to Scrap Some AI Export Curbs*, REUTERS (May 21, 2025), <https://www.reuters.com/world/china/nvidia-says-us-export-controls-ai-china-were-a-failure-2025-05-21/>.

establishment of AI research campuses. These agreements reflect a strategy of fostering economic growth through international partnerships.<sup>12</sup>

**Domestic Regulation:** The administration has expressed opposition to state-level AI regulations, at first advocating for, and later ordering, a unified federal approach that favors innovation over stringent oversight.<sup>13</sup>

These core areas define the Trump administration's approach to AI, emphasizing deregulation, market-driven innovation, and global competitiveness, as outlined in key policy documents and public statements. “At the core of the White House plan, though, is a full-speed-ahead approach to AI that is cast by the White House in the language of the new Cold War.”<sup>14</sup>

To appreciate the administration’s position with greater depth, one must examine certain key documents and the policies behind them, which are addressed in sections I.A through I.F below. It is also important to understand that the Administration’s approach to AI exists as an extension of a broader world view: “Anchored in Trump’s America First philosophy and a steadfast commitment to innovation over regulation, his administration’s policies could ignite rapid technological advancements while significantly altering the global dynamics of AI, cybersecurity, and other pivotal areas of tech policy.”<sup>15</sup> In fact, even the

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<sup>12</sup> Blake Montgomery, *Trump the AI Salesman Makes Deals in the Gulf – and Rich Men Benefit*, GUARDIAN (May 20, 2025), <https://www.theguardian.com/global/2025/may/19/trump-middle-east-ai-deals>.

<sup>13</sup> *Id.*; see also Exec. Order No. 14365, 90 Fed. Reg. 58499 (Dec. 11, 2025), <https://www.federalregister.gov/documents/2025/12/16/2025-23092/ensuring-a-national-policy-framework-for-artificial-intelligence>.

<sup>14</sup> David E. Sanger, *Trump’s A.I. Challenge: Focus on World’s Most Dangerous Weapons or Woke-ism?*, N.Y. TIMES (July 23, 2025), <https://www.nytimes.com/2025/07/23/us/politics/trump-ai-nuclear-weapons.html?smid=nytcore-ios-share&referringSource=articleShare>.

<sup>15</sup> Emil Sayegh, *Decoding Trump’s Tech And AI Agenda: Innovation and Policy Impacts*, FORBES (Nov. 18, 2024), <https://www.forbes.com/sites/emilsayegh/2024/11/18/decoding-trumps-tech-and-ai-agenda-innovation-and-policy-impacts/>. It is also important to appreciate the current and future environmental burdens arising from AI. This is a less frequently articulated but truly urgent concern. There are some studies that have noted that the training model of GPT3 emitted large amounts of waste into the environment and used vast amounts of water, dissipating an already scarce resource, especially in certain regions. For more in-depth discussion of these issues, see Pengfei Li et al., *Making AI Less ‘Thirsty’*, COMMUNS. ACM (June 17, 2025), <https://cacm.acm.org/sustainability-and-computing/making-ai-less-thirsty/>.

creation of the Department of Government Efficiency (DOGE) itself arguably promotes AI development and broader administration economic policies because of “the broad efforts of DOGE . . . to downsize the federal government,” meaning that it will “weed out unnecessary regulations and bureaucratic processes that make it hard to build companies.”<sup>16</sup> Thus, this AI approach “underscores the broader Republican ethos of minimizing government interference to drive rapid technological progress” support and business interests more generally.<sup>17</sup>

Much of this ethos, as applied to AI, is crystalized in OpenAI’s Economic Blueprint for AI in America.<sup>18</sup> The key to that blueprint is preventing, or eliminating, regulatory steps that could inhibit investment or innovation.<sup>19</sup> Instead, regulatory directions, if any, should amount to no more than “common-sense rules of the road that safeguard the public while helping innovators thrive by encouraging investment, competition, and greater freedom for everyone—and to best achieve this, these rules should apply nationwide.”<sup>20</sup> The goal of AI regulation, for proponents of these views, is to “clear the way for the AI industry’s development of frontier models to best ensure that they promote US economic and national security.”<sup>21</sup> One accomplishes this by moving quickly to “streamline requirements, reduce bureaucratic obstacles to government-industry collaboration, and incentivize companies to support US competitiveness.”<sup>22</sup>

For these AI proponents, the government must step out of the way of AI developers and innovators, while giving them a push forward as they whiz by. This can occur through, among other things:

- Creating “AI Economic Zones, created by local, state, and the federal government together with industry, that significantly speed up the permitting processes for

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<sup>16</sup> Cat Zakrzewski, *Vance Boosts AI Industry in France as Trump Embraces the ‘Broligarchy’*, WASH. POST (Feb. 12, 2025), <https://www.washingtonpost.com/politics/2025/02/12/vance-boosts-ai-industry-france-trump-embraces-broligarchy/>.

<sup>17</sup> Sayegh, *supra* note 15.

<sup>18</sup> OPEN AI, AI IN AMERICA: OPENAI’S ECONOMIC BLUEPRINT, FEBRUARY 2025 UPDATE: ADVANCING AI EDUCATION (2025), <https://cdn.openai.com/global-affairs/openai-us-economicblueprint-feb-2025-edu-update.pdf>.

<sup>19</sup> *Id.* at 14.

<sup>20</sup> *Id.* at 5.

<sup>21</sup> *Id.* at 6.

<sup>22</sup> *Id.* at 8.

building AI infrastructure like new solar arrays, wind farms, and nuclear reactors.”<sup>23</sup>

- “Investment in national research infrastructure that would give scientists, innovators, and educators access to the computing and data necessary to accelerate and democratize scientific progress, such as through funding a National AI Research Resource.”<sup>24</sup>
- “Dramatically increased federal spending on power and data transmission and streamlined approval for new lines. That would be accompanied by the creation of a National AI Infrastructure Highway to connect those regional power and communication grids in the interest of national economic competitiveness and security.”<sup>25</sup>

, , Just as some predicted,<sup>26</sup> the administration’s core AI Action Plan of July 23, 2025 would incorporate elements of this blueprint, as discussed further below. Then, in December 2025, the administration supplemented that core plan with an Executive Order aimed at “leaving United States AI companies ... free to innovate without cumbersome regulation”; the EO issued because, in President Trump’s view, “it is imperative that my Administration takes action to check the most onerous and excessive laws emerging from the States that threaten to stymie innovation.”<sup>27</sup>

Going beyond the simple notion of moving out of the way of innovation and business, the proponents of this view of AI development also see these steps in socioeconomic and geopolitical terms. The OpenAI Blueprint repeatedly frames its vision and recommendations as essential to limiting “the Chinese Communist Party’s global influence,” avoiding reliance on “technology funded by the Chinese Communist Party (CCP),” “ensuring that AI around the world is based on US rather than China-based technology,” and creating a “global network of US allies and partners that would compete with the People’s Republic of China’s AI infrastructure alliances while also strengthening security

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<sup>23</sup> *Id.* at 14.

<sup>24</sup> *Id.* at 15.

<sup>25</sup> *Id.*

<sup>26</sup> Ferial Saeed, *The Uncertain Future of AI Regulation in a Second Trump Term*, STIMSON (Mar. 13, 2025), <https://www.stimson.org/2025/the-uncertain-future-of-ai-regulation-in-a-second-trump-term/>.<sup>27</sup> Exec. Order No. 14365, *supra* note 13.

<sup>27</sup> Exec. Order No. 14365, *supra* note 13.

through shared standards.”<sup>28</sup> Indeed, “AI is seen as a critical factor in the strategic competition with China. The ability to maintain US technological primacy through AI has thus become a key strategic priority[.]”<sup>29</sup> and, for those responding to federal government requests for comments on the administration’s future action plan, “[c]oncern over China’s rapid AI progress permeates nearly every submission.”<sup>30</sup>

Beyond the focus on competition with China, there is a broader, and more fundamental, vision of AI’s role in the nation’s future. As President Trump said himself in his first term, “[c]ontinued American leadership in Artificial Intelligence is of paramount importance to maintaining the economic and national security of the United States.”<sup>31</sup> In his second term, President Trump has focused on “fostering a culture of innovation and critical thinking that will solidify our Nation’s leadership in the AI-driven future.”<sup>32</sup>

In fact, as seen in the steps outlined below, some of the elements and ideas of the Trump AI action plan were already falling into place before its formal announcement on July 23, 2025.

#### **A. Executive Order 14179: “Removing Barriers to American Leadership in Artificial Intelligence,” Issued January 23, 2025**

On January 23, 2025, President Donald J. Trump signed Executive Order 14179, titled “Removing Barriers to American Leadership in Artificial Intelligence.”<sup>33</sup> This order rescinds the Biden administration’s Executive Order 14110, which had imposed stricter

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<sup>28</sup> OPENAI, *supra* note 18, at 5-6, 13-14.

<sup>29</sup> Alice Saltini, *AI and Nuclear Strategy Under Trump 2.0: What to Expect*, OPEN NUCLEAR NETWORK (Jan. 30, 2025), <https://platform.opennuclear.org/thoughtroom/external-contributions/ai-and-nuclear-strategy-under-trump-20-what-to-expect>.

<sup>30</sup> Clara Apt & Brianna Rosen, *Shaping the AI Action Plan: Responses to the White House’s Request for Information*, JUST SECURITY (Mar. 18, 2025), <https://www.justsecurity.org/109203/us-ai-action-plan/>.

<sup>31</sup> The White House, ARTIFICIAL INTELLIGENCE FOR THE AMERICAN PEOPLE, WHITE HOUSE, <https://trumpwhitehouse.archives.gov/ai/>; see also OFF. OF SCI. & TECH. POL’Y, ACCELERATING AMERICA’S LEADERSHIP IN ARTIFICIAL INTELLIGENCE (2019), <https://trumpwhitehouse.archives.gov/articles/accelerating-americas-leadership-in-artificial-intelligence/>.

<sup>32</sup> Exec. Order No. 14277, 90 Fed. Reg. 17519 (Apr. 23, 2025), <https://www.whitehouse.gov/presidential-actions/2025/04/advancing-artificial-intelligence-education-for-american-youth/>. ; Exec. Order No. 14365, *supra* note 13.

<sup>33</sup> Exec. Order No. 14179, 90 Fed. Reg. 6541 (Jan. 23, 2025), <https://www.whitehouse.gov/presidential-actions/2025/01/removing-barriers-to-american-leadership-in-artificial-intelligence/>.

regulations on AI development. Executive Order 14179 aims to eliminate policies that hinder AI innovation, and to promote US dominance in AI. It directs federal agencies to revise or rescind any directives inconsistent with this goal. The order also establishes an AI Action Plan to sustain and enhance America's AI leadership, focusing on human flourishing, economic competitiveness, and national security. On that same January 23, 2025 date, the White House released a fact sheet detailing the actions taken to enhance America's AI leadership.<sup>34</sup>

**B. Executive Order 14277: “Advancing Artificial Intelligence Education For American Youth,” Issued April 23, 2025**

On April 23, 2025, President Donald Trump signed the executive order (EO)\_titled “Advancing Artificial Intelligence Education for American Youth.”<sup>35</sup> This directive establishes a national strategy to integrate artificial intelligence education across K–12 school and workforce development programs, aiming to prepare American youth for an AI-driven future. The order creates a task force responsible for coordinating federal efforts to promote AI literacy and proficiency among students and educators. The EO further instructs federal agencies to collaborate with industry leaders, academic institutions, and nonprofit organizations to develop AI educational resources for K–12 students, focusing on foundational AI literacy and critical thinking skills. The order further directs the Secretary of Education to prioritize AI in discretionary grant programs for teacher training, ensuring educators are equipped to integrate AI tools into their teaching practices. Similarly, the Secretary of Labor is tasked with leveraging existing authorities and financial incentives to increase participation in AI-related apprenticeships and work-based learning opportunities. States and grantees are encouraged to use Workforce Innovation and Opportunity Act (WIOA) funding to develop AI skills. Further, the National Science Foundation (NSF), along with the Departments of Agriculture and Labor, will prioritize research and training initiatives to expand AI use in education and workforce development. AI will be considered a priority in education grants, fellowships, and scholarship programs across relevant agencies. This executive order builds upon previous efforts to enhance U.S. leadership

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<sup>34</sup> The White House, FACT SHEET: ELIMINATING BARRIERS FOR FEDERAL ARTIFICIAL INTELLIGENCE USE AND PROCUREMENT, WHITE HOUSE (Jan. 2025), <https://www.whitehouse.gov/wp-content/uploads/2025/02/AI-Memo-Fact-Sheet.pdf>.

<sup>35</sup> Exec. Order No. 14277, *supra* note 32.

in AI, including the revocation of prior federal AI policies and the establishment of a plan to promote AI development free from ideological bias.

### **C. OMB Memoranda M-25-21 and M-25-22, Issued April 3, 2025**

In line with Executive Order 14179, the Office of Management and Budget (OMB) issued two memoranda on April 3, 2025:

- **M-25-21: Accelerating Federal Use of AI through Innovation, Governance, and Public Trust:** This memorandum outlines strategies for federal agencies to adopt AI technologies effectively. It emphasizes innovation, governance, and public trust, aiming to make agencies more agile, cost-effective, and efficient.<sup>36</sup>
- **M-25-22: Driving Efficient Acquisition of Artificial Intelligence:** This memorandum provides guidelines for federal agencies to acquire AI systems and services. It includes policies to maximize the use of American AI systems, ensure compliance with privacy requirements, prevent “vendor lock-in,” and establish requirements for ongoing testing and monitoring of AI systems during contract performance.<sup>37</sup>

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<sup>36</sup> OFF. OF MGMT. & BUDGET, MEMORANDUM ON ACCELERATING FEDERAL USE OF AI THROUGH INNOVATION, GOVERNANCE, AND PUBLIC TRUST (2025), <https://www.whitehouse.gov/wp-content/uploads/2025/02/M-25-21-Accelerating-Federal-Use-of-AI-through-Innovation-Governance-and-Public-Trust.pdf>.

<sup>37</sup> OFF. OF MGMT. & BUDGET, MEMORANDUM ON DRIVING EFFICIENT ACQUISITION OF ARTIFICIAL INTELLIGENCE IN GOVERNMENT (2025), <https://www.whitehouse.gov/wp-content/uploads/2025/02/M-25-22-Driving-Efficient-Acquisition-of-Artificial-Intelligence-in-Government.pdf>.

## D. The AI Action Plan

The Trump administration released its AI Action Plan on July 23, 2025, through a plan document,<sup>38</sup> three executive orders,<sup>39</sup> and multiple fact sheets.<sup>40</sup> These documents coalesce into a plan oriented around three core principles:

1. “ensuring that American workers benefit from the opportunities created by AI—creating higher-paying jobs for American workers—and increasing the standard of living brought about by breakthroughs in medicine, manufacturing, and many other fields.”<sup>41</sup>
2. ensuring that AI systems are free from “ideological bias and [] designed to pursue objective truth rather than social engineering agendas when users seek factual information or analysis,”<sup>42</sup> and

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<sup>38</sup> The White House, WINNING THE RACE: AMERICA’S AI ACTION PLAN, WHITE HOUSE (July 2025), <https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf> [hereinafter Trump Plan]; see also Ann W. Parks, *White House AI Action Plan Drops: Here’s What We Know*, EPSTEIN BECKER GREEN: HEALTH L. ADVISOR (July 24, 2025), <https://www.healthlawadvisor.com/white-house-ai-action-plan-drops-heres-what-we-know>.

<sup>39</sup> Exec. Order No. 14318, 90 Fed. Reg. 35385 (July 23, 2025), <https://www.whitehouse.gov/presidential-actions/2025/07/accelerating-federal-permitting-of-data-center-infrastructure/>; Exec. Order No. 14319, 90 Fed. Reg. 35389 (July 23, 2025), <https://www.whitehouse.gov/presidential-actions/2025/07/preventing-woke-ai-in-the-federal-government/>; Exec. Order No. 14320, 90 Fed. Reg. 35393 (July 23, 2025), <https://www.whitehouse.gov/presidential-actions/2025/07/promoting-the-export-of-the-american-ai-technology-stack/>.

<sup>40</sup> The White House, FACT SHEET: PRESIDENT DONALD J. TRUMP PREVENTS WOKE AI IN THE FEDERAL GOVERNMENT, WHITE HOUSE (July 23, 2025), <https://www.whitehouse.gov/fact-sheets/2025/07/fact-sheet-president-donald-j-trump-prevents-woke-ai-in-the-federal-government/>; The White House, FACT SHEET: PRESIDENT DONALD J. TRUMP ACCELERATES FEDERAL PERMITTING OF DATA CENTER INFRASTRUCTURE, WHITE HOUSE (July 23, 2025), <https://www.whitehouse.gov/fact-sheets/2025/07/fact-sheet-president-donald-j-trump-accelerates-federal-permitting-of-data-center-infrastructure/>; The White House, FACT SHEET: PRESIDENT DONALD J. TRUMP PROMOTES THE EXPORT OF AMERICAN AI TECHNOLOGIES, WHITE HOUSE (July 23, 2025), <https://www.whitehouse.gov/fact-sheets/2025/07/fact-sheet-president-donald-j-trump-promotes-the-export-of-american-ai-technologies/>.

<sup>41</sup> The White House, *supra* note 38, at 1.

<sup>42</sup> *Id.* at 2; Parks, *supra* note 38.

3. preventing America's advanced technologies from being misused or stolen by malicious actors, as well as monitoring risk.<sup>43</sup>

The introduction to the 28-page AI Action Plan emphasizes the need “to innovate faster and more comprehensively than our competitors in the development and distribution of new AI technology across every field and dismantle unnecessary regulatory barriers that hinder the private sector in doing so.”<sup>44</sup>

To achieve its goals, the Trump AI Action Plan focuses on three areas: (i) accelerating AI innovation; (ii) building American AI infrastructure; and (iii) leading in international AI diplomacy and security.<sup>45</sup> The AI Action Plan proposes more than 90 federal policy actions across these three areas to fulfill the plan's goals.<sup>46</sup> We address the most salient of these policies and proposals below.

### **1. The Trump Plan**

The core plan document of the AI Action Plan, which we will refer to here for convenience as the “Trump Plan”, focuses in primary ways on innovation. To spur AI innovation, the Trump Plan pushes for: (1) development and sharing of open-source and open-weight AI models; (2) building of world-class, high quality training datasets; (3) investment in scientific breakthroughs related to AI interpretability, control, and robustness; and (4) establishing an ecosystem to support scientific progress in evaluating AI system performance and reliability. Indeed,

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<sup>43</sup> The White House, *supra* note 38, at 2, 20-23; Parks, *supra* note 38.

<sup>44</sup> The White House, *supra* note 38, at 1.

<sup>45</sup> *Id.* at 20-23; Parks, *supra* note 38.

<sup>46</sup> As to the suggested policy actions, there is some focus on the Federal Trade Commission (FTC). For instance, the AI Action Plan recommends that the FTC review its investigations initiated under the previous administration to ensure they do not advance “theories of liability that unduly burden AI innovation.” The White House, *supra* note 38, at 3. It further recommends that the FTC review all existing final orders, consent decrees, and injunctions to modify or set aside those that “unduly burden AI innovation.” *Id.* at 3-4. Thus, it “is likely to wind up in the crosswinds of any attempt to balance the risks and rewards of this fast-evolving industry and to enhance its ‘dominance.’” As the agency charged with consumer protection and protecting competition, the FTC has its work cut out for it in a US that embraces unregulated development and deployment of AI.” Eleanor Tyler et al., BLOOMBERG L., EXECUTIVE ORDERS: ASSESSING THE IMPACT 3 (July 28, 2025), [https://assets.bbhub.io/bna/sites/18/2025/07/BLAW\\_July-Executive-Orders-Report-7-25.pdf](https://assets.bbhub.io/bna/sites/18/2025/07/BLAW_July-Executive-Orders-Report-7-25.pdf) (“The policy shift in the executive branch, as reflected in the titles of the two EOs, is from a policy of caution about the potential risks of AI to one of removing perceived regulatory obstacles to a ‘national champion’ industry”).

the Trump Plan calls for the establishment of “regulatory sandboxes”—known as AI Centers of Excellence—where researchers, startups, and established enterprises can test AI tools freely.<sup>47</sup> Although this initial Trump Plan did not attempt to pre-empt state regulations (a step more recently attempted with the Supplement to the AI Action Plan discussed in Part I.E., *infra*), it disincentivizes such steps by discouraging AI-related federal funding from being directed toward states with “burdensome” AI regulations, while simultaneously directing the federal government to avoid interfering with states’ rights to pass “prudent laws that are not unduly restrictive to innovation.”<sup>48</sup> The plan calls for the identification, revision, or repeal of regulations, rules, guidance, and the like, that “unnecessarily hinder AI development or deployment,” and calls for federal agencies to consider a state’s AI regulatory climate when making funding decisions. It also calls for the Federal Communications Commission to determine whether state AI regulations interfere with its work under the Communications Act of 1934.

The innovation component incorporates a worker-friendly focus by including within the Trump Plan six recommended policy actions centered around the empowerment of American workers in the age of AI. These recommendations involve incorporating AI skill development into training programs, providing funding for retraining individuals affected by AI-related job displacement, and examining the impacts of AI on the American workforce. The Trump Plan also aims to facilitate AI adoption across various industries, enabling more workers to use AI in their daily tasks. Additionally, under the second pillar, the Trump Plan seeks to

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<sup>47</sup> This concept has already been adopted in Texas, which enacted the Texas Responsible Artificial Intelligence Act, passed June 22, 2025, and effective next year. See Frances M. Green and Katherine Heaney, *Lone Star State: How Texas Is Pioneering President Trump’s AI Agenda*, EPSTEIN BECKER GREEN: WORKFORCE BULL. (July 11 2025), <https://www.workforcebulletin.com/lone-star-state-how-texas-is-pioneering-president-trumps-ai-agenda>.

<sup>48</sup> The White House, *supra* note 38, at 3. As our colleagues have noted, “With regard to federal funding to states, particularly in light of the AI Action Plan’s goal of building data centers and semiconductor facilities, it remains unclear whether current state AI-related consumer protection, disclosure, and privacy laws will be deemed ‘prudent’ or ‘burdensome’—and whether the determination will turn on the law’s text, or on how aggressively a state elects to enforce its law.” Parks, *supra* note 38. Further, with the release of the Plan, President Trump was still espousing pre-emption or pre-emption-like results, noting that “We need one commonsense, federal standard that supersedes all states, supersedes everybody, so you don’t end up in litigation with 43 states at one time.” Alexandra Kelley, *Trump Signs 3 Executive Orders to Advance AI*, NEXTGOV (July 23, 2025), <https://www.nextgov.com/artificial-intelligence/2025/07/trump-signs-3-executive-orders-advance-ai/406943/>. See also December 11, 2025 Executive Order Supplementing the AI Action Plan, discussed *infra* Section I.E.

train a skilled workforce responsible for developing the national AI infrastructure.

The Trump Plan, however, incorporates its own viewpoints on both domestic and international politics into its preferred AI strategies. For example, it rejects "social engineering agendas" by directing the revision of the National Institute of Standards and Technology (NIST) AI Risk Management Framework to "eliminate references to misinformation, Diversity, Equity, and Inclusion, and climate change." Developers of large language models (LLMs) who work with the government must ensure their systems are "objective and free from top-down ideological bias." Additionally, the Trump Plan supports exporting American AI to satisfy global demand and criticizes China's influence in setting international standards. It aims to prevent foreign adversaries from accessing "AI Compute" (resources needed to train AI models) by implementing export controls and evaluating the national security risks associated with American frontier models.

## ***2. The Executive Orders and Fact Sheets Issued with the Plan***

As noted, there are three executive orders, which we will discuss in turn.

### **(a) Executive Order 14318, and Accompanying Fact Sheet, Issued July 23, 2025**

Executive Order, 14318, entitled "Accelerating Federal Permitting of Data Center Infrastructure," revokes the earlier Executive Order 14141 of January 14, 2025, entitled "Advancing United States Leadership in Artificial Intelligence Infrastructure."<sup>49</sup> The Administration declared a policy of "bold, large scale industrial plans" for AI data and infrastructure, which includes the necessary transmission lines and equipment, the reduction of regulatory obstacles that could impede this growth, and the utilization of federally-owned land and resources for the establishment of data centers.<sup>50</sup> The Secretary of Commerce is instructed to initiate a program to provide financial assistance for eligible projects, which may involve loans, grants, tax incentives, and offtake agreements,

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<sup>49</sup> Parks, *supra* note 38.

<sup>50</sup> *Id.*

while other relevant agencies are directed to take measures to expedite environmental reviews and authorize federal lands for this purpose.<sup>51</sup>

The Administration also released a fact sheet to accompany this Executive Order.<sup>52</sup> While somewhat repetitious of the Executive Order, the Fact Sheet provides an interpretive gloss to the EO and helps locate the Administration's points of emphasis and perspective. For instance, the Fact Sheet puts editorial stress on changes from "Biden-era" steps that this Administration contends "would have saddled AI data center development on Federal lands with pages of DEI and climate requirements," and it emphasizes that this Administration's approach will "streamline . . . reviews and permitting for data centers and related infrastructure" and "enhance[] transparency and efficiency" through "expedited permitting under the FAST-41 framework." The Trump Administration is placing an emphasis on "rapid buildout of AI data centers and critical infrastructure to secure economic prosperity, national security, and scientific leadership" that it sees as "essential for powering America's technological and industrial future." Again, stepping back from the Biden Administration, and signaling the market, the Fact Sheet stresses this plan's aversion to "[l]engthy and complex Federal regulations" that "can delay critical projects, hindering America's ability to lead in AI and manufacturing." Through this approach, they predict they are "ushering in a golden age for American technological dominance."

**(b) Executive Order 14319, And  
Accompanying Fact Sheet, Issued July  
23, 2025**

Executive Order, 14319, entitled "Preventing Woke AI in the Federal Government," requires agencies to only acquire large language models (LLMs) that are both accurate and ideologically neutral. The Office of Management and Budget (OMB), in collaboration with other entities, is tasked with issuing guidance to agencies on "unbiased AI principles" within 90 days.<sup>53</sup> Emphasizing a model of "free speech and American values," the EO also advocates for the rejection of "social engineering agendas" by mandating the revision of the National Institute of Standards and Technology (NIST) AI Risk Management Framework to remove references to misinformation; diversity, equity, and inclusion;

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<sup>51</sup> *Id.*

<sup>52</sup> The White House, *supra* note 40.

<sup>53</sup> Parks, *supra* note 38.

and climate change. Developers of large language models (LLMs) who contract with the government must ensure that their systems are “objective and free from top-down ideological bias.”<sup>54</sup>

The Administration likewise released a fact sheet to accompany this Executive Order.<sup>55</sup> The fact sheet posited that the Executive Order on Woke AI “prioritize[d] truthfulness and ideological neutrality” in a manner that was “protecting Americans from biased AI outputs driven by ideologies like diversity, equity, and inclusion (DEI) at the cost of accuracy.” As defined in the Fact Sheet, “truth-seeking” means an emphasis on “historical accuracy, scientific inquiry, and objectivity, and acknowledg[ment of] uncertainty where reliable information is incomplete or contradictory.” While a commitment to truth-seeking as so defined appears objectively reasonable and welcome, actions often speak louder than words. Critics of the administration’s aggressive approach to social issues, which prominently includes punitive measures designed to roll back decades of DEI-related policies, will now certainly question whether the EO will, in fact, likely advance progress in “truth-seeking” as defined by the administration, rather than reverse such progress. As is increasingly the case, partisan political views on either end of the spectrum will yield differing interpretations of the outcomes of the EO, assuming, for the sake of argument, that such outcomes can be reliably measured.

It is unclear, of course, what experience OMB has in creating guidance, or in overseeing subject-matter-expert agencies in creating guidance, on accuracy, neutrality, and lack of bias. This is a particularly fraught undertaking since “bias” can mean very different things in the context of assessing AI programming,<sup>56</sup> understanding implications of woke literature for traditional mores, and performing balanced historical and literary analysis from multiple perspectives.<sup>57</sup> Indeed, recent judicial

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<sup>54</sup> *Id.*

<sup>55</sup> The White House, *supra* note 40.

<sup>56</sup> Chapman Univ., *Bias in AI*, CHAPMAN UNIV.: A.I. HUB, <https://www.chapman.edu/ai/bias-in-ai.aspx>.

<sup>57</sup> Eryk Salvaggio, *AI Could Never Be ‘Woke’*, TECH POLICY PRESS (July 24, 2025), <https://techpolicy.press/sorry-donald-trump-ai-could-never-be-woke>; see also Kevin Roose, *The Chatbot Culture Wars Are Here*, N.Y. TIMES (July 23, 2025) (“There is also the problem of defining what, exactly, a ‘neutral’ or ‘unbiased’ A.I. system is. Today’s A.I. chatbots are complex, probability-based systems that are trained to make predictions, not give hard-coded answers. Two ChatGPT users may see wildly different responses to the same prompts, depending on variables like their chat histories and which versions of the model they’re using. And testing an A.I. system for bias isn’t as simple as feeding it a list of questions about politics and seeing how it responds”),

decisions concerning large language model AI systems have emphasized their preferred insatiable and omnivorous approach to content ingestion as the best path to optimal functioning.<sup>58</sup> Picking out certain pieces of history or literature to exclude from ingestion will inherently tilt the output, making it less effective.<sup>59</sup> Recent contretemps concerning the stocking, or destocking, of libraries of the United States service academies also raise the specter of excluding from data sets perspectives that well-functioning generative AI certainly should have accessible.<sup>60</sup> Finally, as *The New York Times* noted, “courts may reject the Trump administration’s argument that it is trying to enforce a neutral standard for government contractors, rather than interfering with protected speech.”<sup>61</sup>

**(c) Executive Order 14320, and  
Accompanying Fact Sheet, Issued July  
23, 2025**

The new Executive Order, 14320, titled “Promoting the Export of the American AI Technology Stack,” requires the establishment of an American AI Exports Program to support the creation and distribution of comprehensive AI export packages from the US within 90 days.<sup>62</sup> The

<https://www.nytimes.com/2025/07/23/technology/trump-ai-chatbots-bias.html?smid=nytcore-ios-share&referringSource=articleShare>.

<sup>58</sup> See *Kadrey v. Meta Platforms, Inc.*, No. 23-cv-03417-VC, slip op. at 9, 25 (N.D. Cal. Jun. 25, 2025) (“an LLM’s training dataset must be large and diverse,” and “[e]veryone agrees that LLMs work better if they are trained on more high-quality material. So feeding a whole book to an LLM does more to train it than would feeding it only half of that book. With this in mind, it was “reasonably necessary” for Meta to “make use of the entirety of the works”) (citations omitted), and *Bartz v. Anthropic PBC*, No. 24-cv-05417-WHA, slip op. at 26 (N.D. Cal. Jun. 23, 2025) (“Authors contend that because Anthropic showed it could use such smaller sets of books, it surely could have used no books at all — or at least not their books. But Authors forget that ‘reasonably necessary’ does not mean ‘strictly necessary.’ Authors do not contest that the volume of text required to train an LLM is monumental. Because using so many works was reasonably necessary, using any one work for actually training LLMs was about as reasonable as the next.”).

<sup>59</sup> See I. Almeida, INTRODUCTION TO LARGE LANGUAGE MODELS FOR BUSINESS LEADERS: BEYOND THE FEAR AND HYPE (2023) (noting that attempts to filter out “toxicity,” however defined, “can disproportionality exclude positive portrayals of marginalized groups”).

<sup>60</sup> See John Ismay, *Who’s In and Who’s Out at the Naval Academy’s Library?*, N.Y. TIMES (Apr. 11, 2025), <https://www.nytimes.com/2025/04/11/us/politics/naval-academy-banned-books.html>. See also John Ismay, *These Are the 381 Books Removed from the Naval Academy Library*, N.Y. TIMES (Apr. 4, 2025), <https://www.nytimes.com/2025/04/04/us/politics/naval-academy-dei-books-removed.html>.

<sup>61</sup> *Roose*, *supra* note 57.

<sup>62</sup> Exec. Order No. 14320, *supra* note 39; see also Parks, *supra* note 38.

Secretary of Commerce is directed to publicly seek proposals from industry-led consortia, following the order's requirements, also within 90 days.<sup>63</sup> Additionally, the Executive Order mandates the use of federal financing tools.<sup>64</sup>

As with the other executive orders issued on July 23, 2025, the Administration released a fact sheet to accompany this executive order.<sup>65</sup> The fact sheet notes that American leadership in AI is a national priority.<sup>66</sup> Thus, this executive order directs the Secretary of Commerce to establish the American AI Exports Program, which will support the development and deployment of comprehensive AI export packages that will receive export support from the Economic Diplomacy Action Group, including loans, guarantees, and technical assistance.<sup>67</sup> The fact sheet asserts that such investment is justified since AI is seen as a foundational technology that will shape the future of innovation, defense, and prosperity by “secur[ing] economic growth, national security, and global competitiveness.”<sup>68</sup> The fact sheet contends that, “by exporting American AI,” the US aims to “strengthen ties with allies, promote U.S. standards and governance models, and maintain technological dominance.”<sup>69</sup>

### **E. AI Action Plan Supplemented By December 2025 Executive Order**

On December 11, 2025, President Trump issued an executive order designed to override state-level regulations that restrict the artificial intelligence industry.<sup>70</sup> This move, favored by technology companies opposed to strict regulation, gives the Attorney General of the United States the power to challenge and overturn state laws that are seen as obstacles to the United States’ goal of global leadership in AI.<sup>71</sup> As a result, many state laws focused on AI safety and consumer protection could be invalidated. If states refuse to repeal such laws, the order authorizes federal agencies to withhold funding for broadband

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<sup>63</sup> *Id.*

<sup>64</sup> *Id.*; see also *White House AI Action Plan Drops: Here’s What We Know*, *supra* note 38.

<sup>65</sup> The White House, *supra* note 40.

<sup>66</sup> *Id.*

<sup>67</sup> *Id.*

<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

<sup>70</sup> Exec. Order No. 14365, *supra* note 13.

<sup>71</sup> *Id.*

and other projects as leverage.<sup>72</sup> Trump, in the order, argued that a single, unified federal approach is necessary to eliminate the confusion caused by varying state regulations and to ensure that the U.S. maintains its competitive edge over China in AI development.<sup>73</sup>

## F. A Summary of The Administration's AI Views

The Trump Plan signifies a major shift towards deregulation as the primary catalyst for rapid innovation, aiming for US global AI leadership through national infrastructure investment, assertive diplomacy, and a vision of AI systems that reflect “American values.” However, the Trump AI Action Plan’s long-term effects depend on the uncertain dynamics between state and federal governments and the practical results of policies that prioritize speed over safety measures. This plan thus marks a significant departure from the Biden administration’s approach, which focused on identifying and addressing potential risks and challenges of integrating AI into the workplace. With the then-Trump-budget/spending-bill’s failure to halt state and local AI legislation, the responsibility for managing these risks in the United States for a time seemed as if it would largely fall to state and local governments. But, with the December 11, 2025 Executive Order and the more recent National AI Legislative Framework, much of what the states had done will likely face challenges from the Trump administration as an unacceptably burdensome “patchwork of conflicting state laws.”<sup>74</sup>

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<sup>72</sup> *Id.*

<sup>73</sup> *Id.*

<sup>74</sup> See Cecilia Kang, *Trump Signs Executive Order to Neuter State A.I. Laws*, N.Y. TIMES (Dec. 11, 2025), <https://www.nytimes.com/2025/12/11/technology/ai-trump-executive-order.html?smid=nytcare-ios-share>. As Kang notes, states have been active:

States have rushed to fill a void of federal regulation with their own laws on A.I. safety, requiring certain safety measures from companies and putting guardrails around the way the technology can be used. This year, all 50 states and territories introduced A.I. legislation and 38 states adopted about 100 laws, according to the National Conference of State Legislatures.

California has passed a law that requires the biggest A.I. models, including OpenAI’s ChatGPT and Google’s Gemini, to test for safety and to disclose the results. South Dakota passed a law banning deep fakes, which are realistic A.I.-generated videos, in political advertisements within months of an election. Utah, Illinois and Nevada passed laws related to A.I. chatbots and mental health, requiring disclosures that users are engaging with chatbots and adding restrictions on data collection.

## II. THE CATHOLIC CHURCH'S ETHICAL POSITION ON AI

The Catholic Church's emerging position on AI is grounded in a long-standing commitment to moral theology, social doctrine, and the inherent dignity of the human person. Under Pope Leo XIV, the Church advocates for a human-centered, ethically-regulated approach to technological advancement. Understanding how this has evolved requires understanding the most current events (like the recent conclave and the papal name the new pope chose), recent developments over the last few years (such as an encyclical from Pope Francis), and the Church's historic focus on the dignity of the individual (as expressed in church teachings going back to the Industrial Revolution or before).

This section reviews the Church's current views on the topic of AI, distilled from our review of the Church's position statements and published religious doctrine.

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The National AI Legislative Framework (available at [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.whitehouse.gov/wp-content/uploads/2026/03/03.20.26-National-Policy-Framework-for-Artificial-Intelligence-Legislative-Recommendations.pdf](https://www.whitehouse.gov/wp-content/uploads/2026/03/03.20.26-National-Policy-Framework-for-Artificial-Intelligence-Legislative-Recommendations.pdf)) issued March 20, 2026. As noted in the accompanying White House press release (available at <https://www.whitehouse.gov/releases/2026/03/president-donald-j-trump-unveils-national-ai-legislative-framework/>), the framework addressed the "six key objectives" of (i) Protecting Children and Empowering Parents, (ii) Safeguarding and Strengthening American Communities, (iii) Respecting Intellectual Property Rights and Supporting Creators, (iv) Preventing Censorship and Protecting Free Speech, (v) Enabling Innovation and Ensuring American AI Dominance, and (vi) Educating Americans and Developing an AI-Ready Workforce. That press release also noted that:

Importantly, this framework can succeed only if it is applied uniformly across the United States. A patchwork of conflicting state laws would undermine American innovation and our ability to lead in the global AI race.

The Federal government is uniquely positioned to set a consistent national policy that enables us to win the AI race and deliver its benefits to the American people, while effectively addressing the policy challenges that accompany this transformative technology. The Administration looks forward to working with Congress in the coming months to turn this framework into legislation that the President can sign.

### **A. Papal Name Significance, Pope Leo XIV in his own Words, and Historical Continuity on the Topic of Artificial Intelligence**

Pope Leo XIV chose his papal name in homage to Pope Leo XIII,<sup>75</sup> who, in 1891, issued the landmark encyclical *Rerum Novarum* on capital and labor.<sup>76</sup> That 19<sup>th</sup> century encyclical, discussed in more detail, *infra*, articulated the Church's response to the Industrial Revolution and emphasized the rights of workers, the limits of capitalism, and the moral responsibilities of employers and states. Pope Leo XIV sees the rise of AI as a similarly transformative moment and has invoked a parallel moral lens:

There are different reasons for [choosing to take the name Leo], but mainly because Pope Leo XIII in his historic Encyclical *Rerum Novarum* addressed the social question in the context of the first great industrial revolution.

In our own day, the Church offers to everyone the treasury of her social teaching in response to another industrial revolution and to developments in the field of artificial intelligence that pose new challenges for the defense of human dignity, justice and labour.<sup>77</sup>

Following his election as pontiff, Pope Leo XIV has demonstrated, early and often, that he intends to address ethical issues of artificial intelligence head on. In so doing, the Pope has shown that he intends to follow in the footsteps of his predecessor by continuing Pope Francis's

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<sup>75</sup> Kathleen N. Hattrup, *Pope Leo's Own Explanation for Why He Chose His Name: AI*, ALETEIA (May 11, 2025), <https://aleteia.org/2025/05/11/pope-leos-own-explanation-for-why-he-chose-his-name-ai/>. See also International Theological Commission, *Quo Vadis, Humanitas? Thinking Through Christian Anthropology In The Face Of Certain Scenarios For The Future Of Humanity* (March 4, 2026) (hereafter *Quo Vadis, Humanitas?*), at paragraph 4 ("Pope Leo XIV justified his choice of name by recalling that 'in our own day, the Church offers to everyone the treasury of her social teaching in response to another industrial revolution and to developments in the field of artificial intelligence that pose new challenges for the defence of human dignity, justice and labour.'"), [https://www.vatican.va/roman\\_curia/congregations/cfaith/cti\\_documents/rc\\_cti\\_d oc\\_20260304\\_quo-vadis-humanits\\_en.html](https://www.vatican.va/roman_curia/congregations/cfaith/cti_documents/rc_cti_d oc_20260304_quo-vadis-humanits_en.html)

<sup>76</sup> Pope Leo XIII, *Rerum Novarum*, HOLY SEE (May 15, 1891), [https://www.vatican.va/content/leo-xiii/en/encyclicals/documents/hf\\_l-xiii\\_enc\\_15051891\\_rerum-novarum.html](https://www.vatican.va/content/leo-xiii/en/encyclicals/documents/hf_l-xiii_enc_15051891_rerum-novarum.html)

<sup>77</sup> Pope Leo XIV, *Address of the Holy Father to the College of Cardinals*, HOLY SEE (May 11, 2025), <http://www.vatican.va/content/leo-xiv/en/speeches/2025/may/documents/20250510-collegio-cardinalizio.html>.

“courageous and trusting dialogue with the contemporary world in its various components and realities.”<sup>78</sup>

**1. Message to the Second Annual Rome AI Conference  
(June 17, 2025)**<sup>79</sup>

Pope Leo XIV took the opportunity early in his papacy to engage the contemporary world on the issues arising from AI. At the Rome AI Conference, he responded by:

- Observing the “urgent need for serious reflection and ongoing discussion on the inherently ethical dimension of AI, as well as its responsible governance”<sup>80</sup>;
- Noting that AI technologies, like any other tools, “point to the human intelligence that crafted them and draw much of their ethical force from the intentions of the individuals that wield them”<sup>81</sup>;
- Expressing the Church’s wishes “to contribute to a serene and informed discussion of these pressing questions by stressing above all the need to weigh the ramifications of AI in light of the ‘integral development of the human person and society’”<sup>82</sup>;
- Defining a “superior ethical criterion” to evaluate the benefits or risks of AI as “taking into account the well-being of the human person not only materially, but also intellectually and spiritually” and “safeguarding the inviolable dignity of each human person and respecting the cultural and spiritual riches and diversity of the world’s peoples”<sup>83</sup>;

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<sup>78</sup> Philip Pullella and Joshua McElwee, *Pope Leo Tells Cardinals They Must Continue ‘Precious Legacy’ of Pope Francis*, REUTERS (May 10, 2025), <https://www.reuters.com/world/pope-leo-tells-cardinals-they-must-continue-precious-legacy-pope-francis-2025-05-10/>.

<sup>79</sup> Pope Leo XIV, *Message of Pope Leo XIV to Participants in the Second Annual Conference on Artificial Intelligence, Ethics, and Corporate Governance [Rome, 19–20 June 2025]*, HOLY SEE (June 17, 2025), <https://www.vatican.va/content/leo-xiv/en/messages/pont-messages/2025/documents/20250617-messaggio-ia.html>

<sup>80</sup> *Id.*

<sup>81</sup> *Id.*

<sup>82</sup> *Id.* (quoting DICASTERY FOR THE DOCTRINE OF THE FAITH & DICASTERY FOR CULTURE & EDUC., HOLY SEE, *ANTIQUA ET NOVA: NOTE ON THE RELATIONSHIP BETWEEN ARTIFICIAL INTELLIGENCE AND HUMAN INTELLIGENCE* ¶ 6 (Jan 28, 2025), [https://www.vatican.va/roman\\_curia/congregations/cfaith/documents/rc\\_ddf\\_doc\\_20250128\\_antiqua-et-nova\\_en.html](https://www.vatican.va/roman_curia/congregations/cfaith/documents/rc_ddf_doc_20250128_antiqua-et-nova_en.html)).

<sup>83</sup> Pope Leo XIV, *supra* note 79.

- Lamenting, as did Pope Francis, that “our societies today are experiencing a certain ‘loss, or at least an eclipse, of the sense of what is human,’ and this in turn challenges all of us to reflect more deeply on the true nature and uniqueness of our shared human dignity”<sup>84</sup>;
- Proposing that “acknowledging and respecting what is uniquely characteristic of the human person is essential to the discussion of any adequate ethical framework for the governance of AI”<sup>85</sup>; and
- Warning of the consequences to future generations who confuse mere “access to data” with “authentic wisdom” or true intelligence, stating, “All of us, I am sure, are concerned for children and young people, and the possible consequences of the use of AI on their intellectual and neurological development . . . [s]ociety’s well-being depends upon their being given the ability to develop their God-given gifts and capabilities.”<sup>86</sup>

## ***2. Address to the International Inter-Parliamentary Union (June 21, 2025)***<sup>87</sup>

Days after the AI Conference, the Pope further elaborated on the position of the Church by:

- Noting that the “major challenge” presented by AI is that it “will certainly be of great help to society, provided that its employment does not undermine the identity and dignity of the human person and his or her fundamental freedoms”<sup>88</sup>;
- Reminding delegates that “artificial intelligence functions as a tool for the good of human beings, not to diminish them, not to replace them,” and that “[o]ur personal life has greater value than any algorithm, and social relationships require spaces for

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<sup>84</sup> *Id.* (quoting Pope Francis, *Pope Francis Attends the G7 Session on Artificial Intelligence [13-15 June 2024]: Address of His Holiness Pope Francis*, HOLY SEE (June 14, 2024), <https://www.vatican.va/content/francesco/en/speeches/2024/june/documents/20240614-g7-intelligenza-artificiale.html>).

<sup>85</sup> Pope Leo XIV, *supra* note 79.

<sup>86</sup> *Id.*

<sup>87</sup> Pope Leo XIV, *Address of Pope Leo XIV to Members of the International Inter-Parliamentary Union*, HOLY SEE (June 21, 2025), <http://www.vatican.va/content/leo-xiv/en/speeches/2025/june/documents/20250621-giubileo-governanti.html>.

<sup>88</sup> *Id.*

development that far transcend the limited patterns that any soulless machine can pre-package”<sup>89</sup>;

- Contrasting the “static memory” of AI with the memory of human beings, which “is creative, dynamic, generative, capable of uniting past, present and future in a lively and fruitful search for meaning, with all the ethical and existential implications that this entails”<sup>90</sup>; and
- Charging the attendees not to “ignore a challenge of this magnitude” but to instead “respond to many citizens who rightly look with both confidence and concern at the issues raised by this new digital culture.”<sup>91</sup>

**3. Message to United Nations International Telecommunication Union (ITU) “AI for Good” Summit (July 10, 2025)**<sup>92</sup>

In his message to the ITU, the Pope again emphasized the supremacy of human rights over technological efficiency and the need for international cooperation on effective regulatory frameworks to uphold these rights. In particular, the Vatican:

- Encouraged attendees “to seek ethical clarity and to establish a coordinated local and global governance of AI, based on the shared recognition of the inherent dignity and fundamental freedoms of the human person”<sup>93</sup>;
- Noted that, in this “‘era of profound innovation’ where many are reflecting on ‘what it means to be human,’ the world ‘is at crossroads, facing the immense potential generated by the digital revolution driven by Artificial Intelligence.’” Therefore, “it is crucial to consider its anthropological and ethical implications, the values at stake and the duties and regulatory frameworks required to uphold those values”<sup>94</sup>;

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<sup>89</sup> *Id.*

<sup>90</sup> *Id.* (cf. Pope Francis, *supra* note 84.).

<sup>91</sup> Pope Leo XIV, *supra* note 87.

<sup>92</sup> Isabella H. de Carvalho, *Pope: AI Development Must Build Bridges of Dialogue and Promote Fraternity*, VATICAN NEWS (July 10, 2025), <https://www.vaticannews.va/en/pope/news/2025-07/pope-leo-xiv-artificial-intelligence-geneva-summit.html>.

<sup>93</sup> *Id.* (quoting message by Secretary of State Cardinal Pietro Parolin).

<sup>94</sup> *Id.* (quoting message by Pope Leo XIV) (citation omitted).

- Reflected on how the “responsibility for ethical use of AI systems” is shared among those who “develop, manage and oversee them” as well as the ultimate users”;<sup>95</sup>
- Emphasized that AI “requires proper ethical management and regulatory frameworks centered on the human person . . . which goes beyond the mere criteria of utility or efficiency”<sup>96</sup>;
- Warned that “[w]hile AI can simulate human reasoning and perform tasks quickly and efficiently, or transform areas such as ‘education, work, art, healthcare, governance, the military, and communication . . . it cannot replicate moral discernment or the ability to form genuine relationships”<sup>97</sup>; and
- Asserted that AI development “must go hand in hand with respect for human and social values, the capacity to judge with a clear conscience, and growth in human responsibility,” and should be built to serve “the interests of humanity as a whole.”<sup>98</sup>

To understand the position that Pope Leo XIV is expressing, one must understand the views that preceded and influenced the new pope. As a review of several key publications and statements of the Church reveals, on the question of human-machine relationships, the Church’s position is, and consistently has been, Humans First.

### **B. *Antiqua et Nova* (2025): Vatican Doctrinal Guidance on AI**

In January 2025, the Vatican released *Antiqua et Nova: Note on the Relationship Between Artificial Intelligence and Human Intelligence*.<sup>99</sup> This document, issued by the Dicastery for the Doctrine of the Faith and approved by Pope Francis, outlines the role of ethics in guiding the development and use of AI, including the Church’s position on ten specific, real-world questions that arise as human beings collectively navigate the new world being shaped by AI.<sup>100</sup> The following key

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<sup>95</sup> *Id.*

<sup>96</sup> *Id.*

<sup>97</sup> *Id.* (quoting message by Pope Leo XIV).

<sup>98</sup> *Id.* (citation omitted).

<sup>99</sup> DICASTERY FOR THE DOCTRINE OF THE FAITH & DICASTERY FOR CULTURE & EDUC., *supra* note 75.

<sup>100</sup> *See id.* (especially at ¶¶ 50-55 (questions concerning AI and society); ¶¶ 56-63 (questions concerning AI and human relationships); ¶¶ 64-70 (questions concerning AI, economy, and labor); ¶¶ 71-76 (questions concerning AI and healthcare); ¶¶ 77-84 (questions concerning AI and education); ¶¶ 85-89 (questions concerning AI,

principles for evaluating AI development emerge from the Church's analysis of these specific questions:

- **Human-Centered Design:** AI must enhance human intelligence and promote authentic human relationships and experiences, not replace or undermine these things with technology that inherently lacks the morality and broader understanding of the world and of complex human relationships that one only achieves by living.<sup>101</sup>
- **Safeguarding Work, Human Dignity, and Autonomy:** The document emphasizes the right to work and the value of preserving the private inner life of individuals, offering critiques of automation and surveillance that may lead to job displacement, a lack of agency in the daily lives of human workers, and the degradation of human creativity and skill.<sup>102</sup>
- **Transparency and Accountability:** Ethical development requires that AI systems be auditable and explainable. Unchecked dissemination of misinformation risks a society that “becomes indifferent to the truth,” “weakening the ‘reciprocal ties and mutual dependencies’ that underpin the fabric of social life.”<sup>103</sup>
- **International Responsibility:** The Church urges collaboration across nations to prevent an arms race in AI (militarily and otherwise), the undue concentration of power in the hands of a few tech giants, and the exacerbation of existing social inequities such as access to quality healthcare, education, and a healthy environment.<sup>104</sup>

Notably, *Antiqua et Nova* balances its critiques of AI with a recognition of the potential benefits AI may offer. The note, however, also

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misinformation, deepfakes, and abuse); ¶¶ 90-94 (questions concerning AI, privacy, and surveillance); ¶¶ 95-97 (questions concerning AI and the protection of our common home); ¶¶ 98-103 (concerning AI and warfare); and ¶¶ 103-107 (questions concerning AI and our relationship with God)).

<sup>101</sup> *Id.*

<sup>102</sup> *Id.*

<sup>103</sup> *Id.* at ¶ 88 (quoting Pope Paul VI, *Pastoral Constitution On the Church in the Modern World: Gaudium et Spes* ¶ 25 (Dec. 7, 1965) [https://www.vatican.va/archive/hist\\_councils/ii\\_vatican\\_council/documents/vat-ii\\_const\\_19651207\\_gaudium-et-spes\\_en.html](https://www.vatican.va/archive/hist_councils/ii_vatican_council/documents/vat-ii_const_19651207_gaudium-et-spes_en.html)).

<sup>104</sup> DICASTERY FOR THE DOCTRINE OF THE FAITH & DICASTERY FOR CULTURE & EDUC., *supra* note 82.

warns against over-valuing the benefits of AI, warning that “AI may prove even more seductive than traditional idols for, unlike idols that ‘have mouths but do not speak; eyes, but do not see; ears, but do not hear,’ AI can ‘speak,’ or at least gives the illusion of doing so.”<sup>105</sup> The note reminds readers that “[i]t is vital to remember that AI is but a pale reflection of humanity—it is crafted by human minds, trained on human-generated material, responsive to human input, and sustained through human labor.”<sup>106</sup> AI cannot possess many of the capabilities specific to human life, and it is also fallible. “By turning to AI as a perceived ‘Other’ greater than itself, with which to share existence and responsibilities, humanity risks creating a substitute for God. However, it is not AI that is ultimately deified and worshipped, but humanity itself—which, in this way, becomes enslaved to its own work.”<sup>107</sup>

Distilled to its essence, *Antiqua et Nova* reminds us that the guiding star of ethical AI development is the simple, yet sometimes elusive, notion that AI must always serve, and never be permitted to degrade, the authentic lived experience of humanity generally. When humanity strays from this path, it risks, according to *Antiqua et Nova*, inverting our relationship with the technology, leading to a perverse dystopia in which human existence becomes increasingly degraded in service of the machine (or the select few who control the technology). From the Church’s point of view, such a world is counter to God’s plan. Regardless of one’s religious affiliation, the authors submit, the need to avoid such an outcome seems unassailable.

### C. Pope Francis and the Rome Call for AI Ethics

Pope Francis laid the groundwork for the Vatican’s current AI ethics by supporting the *Rome Call for AI Ethics*<sup>108</sup> in 2020. This initiative, supported by global tech companies and the Pontifical Academy for Life, sets forth the core principles of AI regulation: transparency, inclusiveness, accountability, impartiality, reliability, and

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<sup>105</sup> *Id.* at ¶105 (first quoting *Psalm* 115:5-6; then *cf. Revelation* 13:15); see also Gerard O’Connell, *New Vatican Document on A.I. Warns against ‘Creating a Substitute for God’*, AM. MAG. (Jan 28, 2025), <https://www.americamagazine.org/politics-society/2025/01/28/vatican-artificial-intelligence-document-249797/>.

<sup>106</sup> DICASTERY FOR THE DOCTRINE OF THE FAITH & DICASTERY FOR CULTURE & EDUC., *supra* note 82, at ¶ 105.

<sup>107</sup> *Id.*

<sup>108</sup> RenAIssance Foundation, *What Is the Matter with AI Ethics?*, RENAISSANCE FOUND., <https://www.romecall.org/> (last visited Aug. 11, 2025).

privacy.<sup>109</sup> According to Pope Francis, the ethical development of algorithms — “algor-ethics” — must be ensured to safeguard the dignity of the human person. As he explained:

There is a political dimension to the production and use of artificial intelligence, which has to do with more than the expanding of its individual and purely functional benefits. In other words, it is not enough simply to trust in the moral sense of researchers and developers of devices and algorithms. There is a need to create intermediate social bodies that can incorporate and express the ethical sensibilities of users and educators.<sup>110</sup>

In the next Section, we examine the document upon which Pope Leo XIV is said to have drawn inspiration when choosing his papal name.

#### **D. *Rerum Novarum*: Encyclical of Pope Leo XIII on Capital and Labor (1891)**

It may seem strange to cite and discuss a 19<sup>th</sup> century encyclical in a discussion of artificial intelligence, yet, to really understand the Church’s, and especially the current Pope’s, views on AI, one must understand how the current debates connect to *Rerum Novarum*. Why does Pope Leo XIV feel these words, written 134 years earlier, continue to have relevance to a new set of opportunities and threats confronting humanity today in the form of AI? Has Pope Leo XIII’s observation been proven true: as “[a]ge gives way to age . . . the events of one century are wonderfully like those of another . . .”?<sup>111</sup> We turn now to answering these questions.

##### **1. *Rerum Novarum* in Context**

Pope Leo XIII did not mince words in 1891’s *Rerum Novarum* in describing the grave situation then troubling the world arising from the

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<sup>109</sup> RenAIssance Foundation, *The Call*, RENAISSANCE FOUND., <https://www.romecall.org/the-call> (last visited Aug. 11, 2025).

<sup>110</sup> Pope Francis, *Meeting with the Participants of the Plenary Assembly of the Pontifical Academy for Life* (Feb. 20, 2020), [https://www.vatican.va/content/francesco/en/speeches/2020/february/documents/papa-francesco\\_20200228\\_accademia-perlavita.html](https://www.vatican.va/content/francesco/en/speeches/2020/february/documents/papa-francesco_20200228_accademia-perlavita.html).

<sup>111</sup> Pope Leo XIII, *supra* note 76, at ¶ 59.

“great labor question.”<sup>112</sup> His description of the great questions of that age could just as easily be said of AI today:

The elements of the conflict now raging are unmistakable, in the vast expansion of industrial pursuits and the marvellous [sic] discoveries of science; in the changed relations between masters and workmen; in the enormous fortunes of some few individuals, and the utter poverty of the masses; the increased self-reliance and closer mutual combination of the working classes; as also, finally, in the prevailing moral degeneracy.<sup>113</sup>

At the time *Rerum Novarum* was published, the Industrial Revolution was in full swing, marked by greater automation and, with it, worldwide labor disruption. Change in the life of the average worker was coming ever faster back then, producing feelings not unlike the sense of awe, bewilderment, and deep anxiety that workers today are feeling as they contemplate how AI will impact their jobs and those of their children.

In the 19<sup>th</sup> Century, one response to such fears was the rise of political concepts such as socialism and communism. While not new, such thinking gained popularity during this period in opposition to unflinching pro-capital, laissez-faire governmental policy, and an often exploitive or indifferent policy of owners in their handling of labor issues.<sup>114</sup> The issue, as framed by Pope Leo XIII, was the existence of “two classes separated by a wide chasm:”<sup>115</sup>

On the one side there is the party which holds power because it holds wealth; which has in its grasp the whole of labor and trade; which manipulates for its own benefit and its own purposes all the sources of

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<sup>112</sup> *Id.* at ¶ 46.

<sup>113</sup> *Id.* at ¶ 1.

<sup>114</sup> For instance, Karl Marx and Friedrich Engels authored *The Communist Manifesto* in 1847–1848, just before the wave of revolutions of 1848 washed across Europe. Their manifesto coined the term “scientific socialism,” which then impacted the final decades of the 19th century. That was a period during which Europe (and other places) saw the rise of political parties devoted to democratic socialism, most of which drew inspiration from Marxist ideas. Notably, the Australian Labor Party became the world’s first elected socialist party when it briefly formed a government in the Colony of Queensland for one week in 1899.

<sup>115</sup> Pope Leo XIII, *supra* note 76, at ¶ 47.

supply, and which is not without influence even in the administration of the commonwealth. On the other side there is the needy and powerless multitude, sick and sore in spirit and ever ready for disturbance.<sup>116</sup>

Socialism, this 19<sup>th</sup> century pope was clear to say, was not the answer. He sharply critiqued systems of government that abolish personal property and substitute the state for the rights of individuals as “false teaching.”<sup>117</sup> Indeed, that Pope found it “amazing”<sup>118</sup> that “crafty agitators”<sup>119</sup> were “setting up anew” such “obsolete opinions.”<sup>120</sup> While acknowledging the very real plight of the “needy and powerless multitude, sick and sore in spirit,”<sup>121</sup> the pope argued that the remedy supplied by socialism is not only unjust and contrary to natural law<sup>122</sup> but the system itself is unworkable and “only injures those whom it would seem meant to benefit.”<sup>123</sup>

## **2. Duty and Morality**

With the publication of *Rerum Novarum*, Pope Leo XIII charted a path between the two extremes of socialism and laissez-faire capitalism to address labor issues wrought by rapid industrialization. For Pope Leo XIII, the place to begin was for both classes—wealthy employers and poor workers—to remember their duties to one another. These duties, as outlined by the Pope, amount to each side acting reasonably with regard to the other. Workers should do their jobs and respect the property of their employers while employers should respect the personal dignity of

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<sup>116</sup> *Id.*

<sup>117</sup> *Id.* at ¶ 2.

<sup>118</sup> *Id.* at ¶ 10.

<sup>119</sup> *Id.* at ¶ 2.

<sup>120</sup> *Id.* at ¶ 10.

<sup>121</sup> *Id.* at ¶ 47.

<sup>122</sup> See *id.* at ¶¶ 6-14. *Rerum Novarum* echoes secular theories already circulating at the time of its publication regarding natural law justifications for personal property ownership and moral duties for the wealthy to engage in philanthropy. For example, compare *Rerum Novarum* ¶¶ 1-21 with the thematically and structurally similar arguments found in Andrew Carnegie’s essay *The Gospel of Wealth*, which was first published in the *North American Review* in June 1889; see CARNEGIE CORP. OF N.Y., THE GOSPEL OF WEALTH, <https://www.carnegie.org/about/our-history/gospelofwealth/> (last visited Aug. 11, 2025).

<sup>123</sup> Pope Leo XIII, *supra* note 76, at ¶ 15.

their workers and treat them fairly.<sup>124</sup> Furthermore, Pope Leo XIII advised:

Christian morality, when adequately and completely practiced, leads of itself to temporal prosperity, for it . . . powerfully restrains the greed of possession and the thirst for pleasure - twin plagues, which too often make a man who is void of self-restraint miserable in the midst of abundance; it makes men supply for the lack of means through economy, teaching them to be content with frugal living, and further, keeping them out of the reach of those vices which devour not small incomes merely, but large fortunes, and dissipate many a goodly inheritance.<sup>125</sup>

While Pope Leo XIII believed that the proper adherence to Christian moral teachings should be sufficient to restore harmony, he noted the Church “aims higher still”<sup>126</sup> by requiring the practice of Christian charity. The Pope explained that Christian charity simply means giving of one’s own free will for the benefit of those less fortunate.<sup>127</sup> A Christian’s duty, according to Leo XIII, is simply to give from what is left over after one’s own needs have been met. Indeed, “no one [sic] is commanded to distribute to others that which is required for his own needs and those of his household; nor even to give away what is reasonably required to keep up becomingly his condition in life, ‘for no one ought to live other than becomingly.’”<sup>128</sup> Christian charity, imbued with personal agency, is distinguished in this way from “a system of relief organized by the State.”<sup>129</sup>

### 3. *The Role of the State and Private Organizations*

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<sup>124</sup> See *id.* at ¶ 20.

<sup>125</sup> *Id.* at ¶ 28.

<sup>126</sup> *Id.* ¶ 21.

<sup>127</sup> See *id.* at ¶ 22-25.

<sup>128</sup> *Id.* at ¶ 22 (quoting THOMAS AQUINAS, *Summa Theologiae II-II*, q. 32, art. 6 (Fathers of the English Dominican Province trans.), in CHRISTIAN CLASSICS ETHEREAL LIB., [https://ccel.org/ccel/aquinas/summa/summa.SS\\_Q32\\_A6.html](https://ccel.org/ccel/aquinas/summa/summa.SS_Q32_A6.html) (last visited Sept. 24, 2025)).

<sup>129</sup> Pope Leo XIII, *supra* note 76 at ¶ 30.

As set forth in *Rerum Novarum*, Pope Leo XIII recommended that the State should be involved, but restrained, in addressing the issue of capital and labor: “[A] State chiefly prospers and thrives through moral rule, well-regulated family life, respect for religion and justice, the moderation and fair imposing of public taxes, the progress of the arts and of trade . . . .”<sup>130</sup> Justice requires governments “to act with strict justice . . . toward each and every class alike.”<sup>131</sup>

In particular, justice “demands that the interests of the working classes should be carefully watched over.”<sup>132</sup> Given the obvious power imbalance, the State should intercede where necessary to save the “unfortunate working people from the cruelty of men of greed, who use human beings as mere instruments for money-making” or “grind men down with excessive labor as to stupefy their minds and wear out their bodies.”<sup>133</sup> This includes upholding their “dignity as human beings” and ensuring their fundamental rights such as health, religious expression, and adequate rest.<sup>134</sup> A worker cannot be required “[t]o consent to any treatment which is calculated to defeat the end and purpose of his being . . . .”<sup>135</sup> With respect to children, “great care” should be taken to safeguard them until their “bodies and minds are sufficiently developed.”<sup>136</sup>

Pope Leo XIII advised, however, that governments should take caution in their exercise of power, “the principle being that the law must not undertake more, nor proceed further, than is required for the remedy of the evil or the removal of the mischief.”<sup>137</sup> This means, in most cases, letting “the working man and the employer make free agreements, and in particular let them agree freely as to the wages,” provided this is done fairly and upon wages that are not “insufficient to support a frugal and well-behaved wage-earner.”<sup>138</sup> Further, excessive taxation should be avoided so that “a man’s means be not drained and exhausted . . . .”<sup>139</sup>

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<sup>130</sup> *Id.* at ¶ 32.

<sup>131</sup> *Id.* at ¶ 33.

<sup>132</sup> *Id.* at ¶ 34.

<sup>133</sup> *Id.* at ¶ 42.

<sup>134</sup> *See id.* at, ¶¶ 36-4.

<sup>135</sup> *See id.* at ¶ 40.

<sup>136</sup> *See id.* at ¶ 42.

<sup>137</sup> *See id.* at ¶ 36.

<sup>138</sup> *See id.* at ¶ 45.

<sup>139</sup> *See id.* at ¶ 47.

Crucially, for Pope Leo XIII, this also included holding firm to the principle that private ownership is “sacred and inviolable.”<sup>140</sup> More specifically, the Pope advised that the State has “the duty of safeguarding private property by legal enactment and protection[,]” for “neither justice nor the common good allows any individual to seize upon that which belongs to another, or, under the futile and shallow pretext of equality, to lay violent hands on other people’s possessions.”<sup>141</sup> Socialists are misguided, argued the Pope, because “it is impossible to reduce civil society to one dead level.”<sup>142</sup> The Pope emphasized:

There naturally exist among mankind manifold differences of the most important kind; people differ in capacity, skill, health, strength; and unequal fortune is a necessary result of unequal condition. Such inequality [sic] is far from being disadvantageous either to individuals or to the community. Social and public life can only be maintained by means of various kinds of capacity for business and the playing of many parts; and each man, as a rule, chooses the part which suits his own peculiar domestic condition.<sup>143</sup>

As one means of checking excessive and intrusive government interference, and to gain the benefit of the specific expertise called for on particular matters, Pope Leo XIII advised that “recourse be had to [private] societies and boards . . . .”<sup>144</sup> The most important of these, argued the Pope, are the workman’s unions.<sup>145</sup> Unions of his time, he argues, like “artificers’ guilds of olden times,” afford many advantages to workers and advance the art in the process.<sup>146</sup> Such organizations should be encouraged and protected by the law so that they “become more numerous and efficient.”<sup>147</sup> The role of such workman’s unions should be to “furnish the best and most suitable means for attaining what is aimed at, that is to say, for helping each individual member to better his

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<sup>140</sup> *See id.* at ¶ 46.

<sup>141</sup> *See id.* at ¶ 38.

<sup>142</sup> *See id.* at ¶ 17.

<sup>143</sup> *See id.*

<sup>144</sup> *See id.* at ¶ 45.

<sup>145</sup> *See id.* at ¶ 49.

<sup>146</sup> *See id.*

<sup>147</sup> *See id.* at ¶¶ 49 and 52.

condition to the utmost in body, soul, and property.” These duties may further include resolving disputes and trying to arrange for steady work for their members.<sup>148</sup>

#### 4. *Continuing Applicability to the AI Question*

Having reviewed *Rerum Novarum*, one can see why Pope Leo XIV chose to reach back to the 19<sup>th</sup> century in selecting his papal name to signal his concern for the issues arising from “another industrial revolution” through AI development. While not all of the specific proposals in *Rerum Novarum* may translate to today’s issues, at a general level, the magnitude of the problem, and the seemingly dire consequences of not finding an equitable resolution, feel very comparable. Concepts such as respect for human dignity and rights, collective and international norm setting, and roles for governments and private organizations, continue to be reflected in the Church’s more recent publication of *Antiqua et Nova*.<sup>149</sup> This is especially true of aspects of the AI dilemma that have direct parallels with the earlier Industrial Revolution, most obviously, the protection of workers’ rights.

A foundational precept to all proposals set forth in *Rerum Novarum* is Pope Leo XIII’s observation that capital and labor need not be in opposition to one another but are, in reality, naturally aligned. This is because, he wrote, “[e]ach needs the other: capital cannot do without labor, nor labor without capital.”<sup>150</sup> For Pope Leo XIII, this alignment of interests did not imply that the power dynamic of capital and labor was balanced. Far from it. As discussed, many of his proposals were specifically directed to address the very real disadvantages of laborers and their resulting exploitation at the time. However, *Rerum Novarum* builds its proposals upon the common ground of mutual interests.

As one considers how to translate the wisdom imparted by *Rerum Novarum* to the current issues of AI, one may question whether its premise of mutual dependency still holds. AI is expected to fundamentally transform the workplace in ways that vastly decreases employers’ reliance on human labor.<sup>151</sup> Therefore, to the extent the power

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<sup>148</sup> See *id.* at ¶¶ 55-58.

<sup>149</sup> See DICASTERY FOR THE DOCTRINE OF THE FAITH & DICASTERY FOR CULTURE & EDUC., *supra* note 82.

<sup>150</sup> See *id.* at ¶ 19.

<sup>151</sup> Jack Kelly, *These Jobs Will Fall First as AI Takes Over the Workplace*, FORBES (Apr. 25, 2025), <https://www.forbes.com/sites/jackkelly/2025/04/25/the-jobs-that-will-fall-first-as-ai-takes-over-the-workplace/> (“A McKinsey report projects that by 2030, 30% of current U.S. jobs could be automated, with 60% significantly altered by

imbalance may be tipping even further to the disadvantage of laborers due to the advent of AI, the hesitancy expressed in *Rerum Novarum* regarding the role of government may require reconsideration. Indeed, Pope Leo XIV's recent statements, and those expressed by the Church in *Antiqua et Nova*, both discussed *infra*, appear to make exactly that calculation by explicitly calling for increased global cooperation in AI regulation.

### **E. *Quo Vadis, Humanitas? Thinking Through Christian Anthropology In The Face Of Certain Scenarios For The Future Of Humanity (2026)***

On March 4, 2026, the Holy See released *Quo Vadis, Humanitas? Thinking Through Christian Anthropology In The Face Of Certain Scenarios For The Future Of Humanity*.<sup>152</sup> Picking up on themes reflected in past speeches and publications from Pope Leo XIV and Pope Francis, *Quo Vadis, Humanitas?* asks the by title and content "Where are you, humanity?"<sup>153</sup> Specifically, with regard to technology, *Quo Vadis, Humanitas?* notes that "The eruption of scientific and technical development unprecedented in the history of the planet must be accompanied by a corresponding growth in responsibility that directs progress toward the good of human beings, because they are today exposed to risks never imagined before."<sup>154</sup>

*Quo Vadis, Humanitas?* addressed various aspects of technology, from social media<sup>155</sup> to mass communications<sup>156</sup> to cosmetic surgery<sup>157</sup> to biotechnology<sup>158</sup> and DNA mapping,<sup>159</sup> saving special attention for artificial intelligence. As Mares noted:

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AI tools. Goldman Sachs predicts up that to 50% of jobs could be fully automated by 2045, driven by generative AI and robotics").

<sup>152</sup> *Quo Vadis, Humanitas?*, supra, at fn. 75; see also Courtney Mares, Vatican theological commission warns of replacing God with 'a world governed by machines', *National Catholic Reporter* (March 5, 2026), <https://www.ncronline.org/vatican/vatican-theological-commission-warns-replacing-god-world-governed-machines>.

<sup>153</sup> Mares, supra at fn. 152 (quoting and translating Latin phrase *Quo Vadis, Humanitas?*).

<sup>154</sup> *Quo Vadis, Humanitas?*, supra, at fn. 75; Mares, supra, at fn. 152.

<sup>155</sup> *Quo Vadis, Humanitas?*, supra, at fn. 75, especially paragraphs 42-45, noting at paragraph 42, for instance, that "The pervasiveness of social media, which has become so indispensable that the existence of the human family without it is unthinkable, requires greater vigilance regarding cultural and economic conditioning."

<sup>156</sup> *Id.*, especially at paragraphs 35, 42, 51).

<sup>157</sup> *Id.*, especially at paragraph 47.

<sup>158</sup> *Id.*, especially at paragraphs 31, 34, 47, 55, and 108.

<sup>159</sup> *Id.*, especially at paragraph 47, noting that "With the development of biotechnology, neuroscience and DNA mapping, combined with advances in pharmacology and robotics (cyborgs), our perception of the body and its meaning is

The commission devoted considerable attention to artificial intelligence, describing it as a technology capable of "replacing all computational and operational aspects of human intelligence" and warning that its rapid development sometimes proceeds "without the prudence born of the wise recognition that good always involves an appropriate limit and proportion."

The document raised particular concerns about automated AI decision-making in sensitive areas, questioning the use of algorithms "when deciding whether or not to provide medical care, granting loans, or mortgages, or providing insurance, or when preparing criminal cases in court ... or when deciding on military strikes."<sup>160</sup>

In doing so, *Quo Vadis, Humanitas?* builds on past teachings, for instance citing or quoting *Antiqua et Nova* seven times,<sup>161</sup> as part the discussion of "[d]iscernment and the kerygmatic dimension of theology: the integral vocation of the human being,"<sup>162</sup> as part of the discussions of people's "[r]elationship with others in the digital world,"<sup>163</sup> on understanding oneself in terms of "consciousness and corporeality,"<sup>164</sup> and on humanity's "[r]elationship with God."<sup>165</sup> Likewise, *Quo Vadis, Humanitas?* cites both Pope Leo XIV previous message to digital influencers and missionaries as well as his message to the July 2025 AI summit,<sup>166</sup> reflecting the continued and

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also changing....The result is a widespread 'cult of the body', which tends towards a frantic search for a perfect figure that is always fit, young and beautiful. Once modified, often with relentless frenzy, the body becomes a body-object in which the person-subject mirrors themselves, creating a relationship in which the person is no longer his or her body but 'owns' a body, from which arises the search for a 'borrowed' identity. ...A curious situation is created: the ideal body is exalted, sought after and cultivated, while the real body is not truly loved, being a source of limitations, fatigue and ageing. One desires a perfect body, while dreaming of escaping from one's own concrete body and its limitations."

<sup>160</sup> Mares, *supra*, at fn. 152 (quoting paragraphs 38, 40, 41 of *Quo Vadis, Humanitas?*). Mares' article seems to be her own translation of the document originally issued in Italian and Spanish. The quoted version in the English language version of *Quo Vadis, Humanitas?* at the Vatican website varies slightly as to the quoted portions of paragraphs 40 and 41, using in the quote above the phrase "military strikes" rather than "military attacks" used in paragraph 40 of *Quo Vadis, Humanitas?* and using the phrase "the prudence born of the wise recognition" instead of the phrase "the caution generated by the wise recognition" used in paragraph 41 of the Vatican's English translation.

<sup>161</sup> *Quo Vadis, Humanitas?*, *supra*, at fn. 75 especially paragraphs 19, 47-60.

<sup>162</sup> *Id.* at paragraphs 17-20. "Kerygmatic" means "[belonging](https://www.collinsdictionary.com/us/dictionary/english/kerygmatic) or relating to [preaching](https://www.collinsdictionary.com/us/dictionary/english/kerygmatic)." Collins Dictionary, <https://www.collinsdictionary.com/us/dictionary/english/kerygmatic>.

<sup>163</sup> *Quo Vadis, Humanitas?*, *supra*, at fn. 75, paragraphs 46-47.

<sup>164</sup> *Id.* at paragraphs 51-60.

<sup>165</sup> *Id.* at paragraphs 48-50.

<sup>166</sup> *Id.* at paragraphs 30-31

consistent focus of this Pope and his Church on a certain vision for AI evolution.

Conversely, *Rerum Novarum* is not expressly cited in *Quo Vadis, Humanitas?* To use a technological analogy of some aptness, however, the 1891 and 2026 Vatican communications seem to have a shared DNA. *Quo Vadis, Humanitas?* resists the reduction of persons to data points, trainable behaviors, or biological systems awaiting upgrade just the same way that *Rerum Novarum* resisted the reduction of persons to labor units in industrial capitalism.<sup>167</sup> Again, this reflects the determined attention that the Holy See is paying to technology, and to assuring an evolution consistent with a spiritually focused human condition.

In the end, *Quo Vadis, Humanitas?* presents a vision of life as a vocation that is received as a gift from God and lived in a relationship with God that is a direct alternative to transhumanist and post-humanist ideologies hinged on technological evolution as an end rather than a means, or on a means corruptive of a spiritual end.<sup>168</sup> *Quo Vadis, Humanitas?* argues that human dignity and destiny are not determined by technological enhancement, but by faithful engagement with life's tensions, openness to Christ, and care for the poor.<sup>169</sup> True human fulfillment, according to *Quo Vadis, Humanitas?*, comes not from surpassing the human condition through technology, but from a saving relationship that affirms humanity as a gift rather than a project to be replaced.<sup>170</sup>

## **F. Analysis of the Catholic Church's Ethical AI Framework and Comparison with Leading Secular Ethical AI Frameworks**

### **1. Discerning an Ethical Framework for AI Development from the Church's Writings**

Taking a page from *Rerum Novarum* and *Quo Vadis, Humanitas?*, one may ask: what common interests can be identified among AI developers, the human workers they would replace with AI, and the governments competing for leadership and control of this technology? To this, the Church seems to have already supplied a simple and compelling answer. The "inherent dignity" of each human life "underpins the tradition of human rights (and, in particular, what are now called 'neuro-rights'), which represent 'an important point of

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<sup>167</sup> Compare *Id.* at paragraphs 31-62 with discussion, *supra*, of *Rerum Novarum*.

<sup>168</sup> Mares, *supra*, at fn. 152

<sup>169</sup> *Id.*

<sup>170</sup> *Id.*

convergence in the search for common ground’ and can, thus, serve as a fundamental ethical guide in discussions on the responsible development and use of AI.”<sup>171</sup>

Pope Leo XIV made this even more clear in in his message to the Second Annual Rome Conference on Artificial Intelligence, published in June 2025: “Acknowledging and respecting what is uniquely characteristic of the human person is essential to the discussion of any adequate ethical framework for the governance of AI.”<sup>172</sup> This is an issue not only for the current generation but for every generation that follows. “All of us, I am sure, are concerned for children and young people, and the possible consequences of the use of AI on their intellectual and neurological development.”<sup>173</sup>

Indeed, “[w]hile AI has been used in positive and indeed noble ways to promote greater equality, Pope Leo XIV still warned of ‘the possibility of its misuse for selfish gain at the expense of others, or worse, to foment conflict and aggression.’”<sup>174</sup> For Pope Leo XIV, “the benefits and risk of AI must be evaluated precisely according to this superior ethical criterion,” namely, by “taking into account the well-being of the human person not only materially, but also intellectually and spiritually; it means safeguarding the inviolable dignity of each human person and respecting the cultural and spiritual riches and diversity of the world’s peoples,” and taking the time “to reflect more deeply on the true nature and uniqueness of our shared human dignity.”<sup>175</sup>

In other words, the Church is telling its adherents and others to take a step back and remember why we are here. God put us here to experience the richness of life in all of its many facets. This opportunity must be respected and preserved in future generations. Technology that

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<sup>171</sup> DICASTERY FOR THE DOCTRINE OF THE FAITH & DICASTERY FOR CULTURE & EDUC., *supra* note 82. at ¶ 34 (quoting Pope Francis, *Address to the Plenary Assembly of the Pontification Academy for Life* (Feb. 28, 2020) (transcript available at [https://www.vatican.va/content/francesco/es/speeches/2020/february/documents/papa-francesco\\_20200228\\_accademia-perlavita.html](https://www.vatican.va/content/francesco/es/speeches/2020/february/documents/papa-francesco_20200228_accademia-perlavita.html))).

<sup>172</sup> Pope Leo XIV, *supra* note 79.

<sup>173</sup> *Id.* (“All of us, I am sure, are concerned for children and young people, and the possible consequences of the use of AI on their intellectual and neurological development. Our youth must be helped, and not hindered, in their journey towards maturity and true responsibility,” underscoring “[T]hey are our hope for the future.”). See also Deborah C. Lubov, *Pope Leo: AI Must Help and Not Hinder Children and Young People’s Development*, VATICAN TIMES (June 20, 2025), <https://www.vaticannews.va/en/pope/news/2025-06/pope-leo-on-ai-exceptional-tool-but-cannot-forget-human-dignity.html> (emphasizing portions of Pope Leo XIV’s speech concerned with the impact of AI on the development of children).

<sup>174</sup> Lubov, *supra* note 154 (quoting Pope Leo XIV, *supra* note 79).

<sup>175</sup> Pope Leo XIV, *supra* note 79.

enhances the gift of authentic human life should be encouraged. Conversely, as the Church reminds us, technology that delegates our human agency, diminishes human dignity, and forces humans into effective servitude to a false God of their own creation is not only misguided but is existentially dangerous. The Pope believes that the goal of avoiding such an outcome can and should be an area of common ground. And common ground is at least a place to start.

The great question of the day is, will humanity choose to recognize our shared long-term interest in the continuation of the human race, or will short-term thinking prevail?

As shown next, the long view espoused by the Catholic Church is in alignment with leading secular approaches concerned with responsible AI development.

## ***2. The Church's Position in Comparison to Secular Frameworks for Ethical AI***

The Catholic Church's expressed views for ethical development and use of AI and AI tools does not start alone, or apart from frameworks proposed by secular groups exploring the same and parallel issues. Thus, the Church's writings and statements propose a framework of AI use for the common good consistent with natural law principles, creator responsibility, and transparency and accountability that avoids idolizing technology while still fostering and praising its development. As seen in this chart, secular groups present clear analogs to such themes, downplaying natural law references but retaining emphases on human rights, dignity, and inclusiveness:

| <b>Catholic Principle</b>                              | <b>Church Source</b>                                      | <b>Matching Secular Principle</b>                      | <b>Secular Source / Framework</b>                                                                                                                         |
|--------------------------------------------------------|-----------------------------------------------------------|--------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Ethical use of technology rooted in natural law</b> | <i>Rerum Novarum</i> (1891); <i>Quo Vadis, Humanitas?</i> | Human-centric AI; respect for human rights and dignity | Organisation for Economic Co-operation and Development (OECD) AI Principles (2020), Principle 1: "AI should benefit people and the planet" <sup>176</sup> |

<sup>176</sup> OECD OBSERVER, OECD, WHAT ARE THE OECD PRINCIPLES ON AI? 1 (2020), <https://doi.org/10.1787/6ff2a1c4-en>.

| Catholic Principle                          | Church Source                                                                        | Matching Secular Principle                         | Secular Source / Framework                                                                                                                    |
|---------------------------------------------|--------------------------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Global AI governance for common good</b> | <i>Antiqua et Nova</i> (2025)                                                        | International cooperation and inclusive governance | UNESCO Recommendation on the Ethics of AI (2022) <sup>177</sup> ; G7 Hiroshima Process (2023) <sup>178</sup>                                  |
| <b>Moral responsibility of AI creators</b>  | <i>Rome Call for AI Ethics</i> (2020)                                                | Accountability and traceability AI development     | EU AI Act (Recital 47 <sup>179</sup> ; Chapter 9, <sup>180</sup> 10 <sup>181</sup> ); NIST AI Risk Management Framework (2023) <sup>182</sup> |
| <b>Warning against techn idolatry</b>       | <i>Antiqua et Nova</i> (2025); <i>Quo Vadis, Humanitas?</i>                          | Prevention of AI misuse and concentration of power | UNESCO (2021): “AI should not deepen digital divides or enable mass surveillance”; EU AI Act: High-risk classification for manipulative AI    |
| <b>Transparency and accountability</b>      | <i>Rome Call</i> (2020); <i>Antiqua et Nova</i> (2025); <i>Quo Vadis, Humanitas?</i> | Explainability, auditability, and public oversight | U.S. White House Blueprint for an AI Bill of Rights (2022) <sup>183</sup> ; EU AI Act; OECD AI Principles (Principle 2)                       |

<sup>177</sup> UNESCO RECOMMENDATIONS ON THE ETHICS OF ARTIFICIAL INTELLIGENCE (2022) (a global normative framework adopted by 193 member states, emphasizing fairness, sustainability, and avoidance of harm).

<sup>178</sup> JAPANESE MINISTRY OF INTERNAL AFFAIRS AND COMMS., HIROSHIMA AI PROCESS (last visited Sept.10, 2025), <https://www.soumu.go.jp/hiroshimaai/process/en/index.html>.

<sup>179</sup> Commission Regulation 2024/1689, 2024 O.J. (L 1689) 1,13.

<sup>180</sup> *Id.* at Chapter IX, 101-113.

<sup>181</sup> *Id.* at Chapter X, 113-115.

<sup>182</sup> U.S. DEP’T OF COM., ARTIFICIAL INTELLIGENCE RISK MANAGEMENT FRAMEWORK (AI RMF 1.0) (2023), <https://nvlpubs.nist.gov/nistpubs/ai/nist.ai.100-1.pdf>.

<sup>183</sup> OFF. OF SCI. AND TECH. POL’Y, BLUEPRINT FOR AN AI BILL OF RIGHTS: MAKING AUTOMATED SYSTEMS WORK FOR THE AMERICAN PEOPLE, WHITE HOUSE (2022), <https://bidenwhitehouse.archives.gov/wp-content/uploads/2022/10/Blueprint-for-an-AI-Bill-of-Rights.pdf>.

Conversely, a closer examination of each of these cited sources, including the Church writings and statements, will find various places of divergence. Yet, directionally at least, the Church's views share more with the suggestions of these bodies than the Trump Action plan seems to share with such governmental and NGO bodies around the world.

### III. DIFFERING VIEWS OF AI

This piece, overall, has explained in some detail the Trump plan for artificial intelligence, and that of the Catholic Church. Lest one get lost in some of the detail, one can succinctly state the differences between the Trump view of AI and the Church's view (along with the parallel views of the Organisation for Economic Cooperation and Development) in chart<sup>184</sup> form:

| Dimension                  | Second Trump Administration (U.S.)                                                                                                                                                                    | Catholic Church                                                                                                                                                    | OECD Principles                                                                                                                               |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Ethical Foundations</b> | National competitiveness, economic growth, administrative efficiency, and national security. Human flourishing is invoked, but mostly within a dominance-and-deployment frame; ideological neutrality | Human dignity, common good, solidarity, prudence, justice, peace, and preservation of human moral agency. AI is a tool that must remain subordinate to the person. | Human-centered and trustworthy AI grounded in inclusive growth, rights, democratic values, transparency, safety/security, and accountability. |

<sup>184</sup> Comparative Analysis of Artificial Intelligence Policy Frameworks: U.S. Trump Administrations, Catholic Ethical Teachings, and OECD AI Principles (generated by Greg Krabacher on March 14, 2025 using ChatGPT-5.4) (report available at <https://chatgpt.com/c/69b58f32-81a0-832b-83ed-17334257389e#:~:text=Download%20the%20Word%20report>). The report was generated using the following prompts available at <https://chatgpt.com/c/69b58f32-81a0-832b-83ed-17334257389e>:

“Write a detailed academic style report providing a comparative analysis of artificial intelligence policy frameworks from three sources: (1) U.S. AI policy under the second Trump Administration (beginning in 2025), including executive orders, spending priorities, administrative structures, and regulatory approaches; (2) The Catholic Church's ethical teachings on artificial intelligence, including: *Antiqua et Nova: Artificial Intelligence and Human Intelligence* (2024) the Rome Call for AI Ethics (2020) public statements of Pope Francis on AI, and the principles of *Rerum Novarum* (1891) as applicable; and (3) The OECD Principles on Artificial Intelligence (2019). The report should include a chart comparing these frameworks across the following dimensions: (1) ethical foundations; (2) regulation and oversight; (3) labor and automation; (4) privacy and data protection; (5) military & AI security; and (6) global cooperation. Include commentary from authoritative sources of legal and policy scholarship and thought leadership. Include footnotes to all sources in full bluebook style format. Convert to a polished Word document with footnotes at the bottom of each page rather than a list of sources at the end.”

| Dimension                          | Second Trump Administration (U.S.)                                                                                                                                                                                                    | Catholic Church                                                                                                                                                                                                 | OECD Principles                                                                                                                                                                                      |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | is emphasized in federal procurement.                                                                                                                                                                                                 |                                                                                                                                                                                                                 |                                                                                                                                                                                                      |
| <b>Regulation and Oversight</b>    | Deregulatory at the system level, but managerial within government: CAIOs, governance boards, inventories, impact assessments, pre-deployment testing, and procurement rules. Strong skepticism toward fragmented state regulation.   | Supports regulation where human dignity or rights are at stake; rejects purely technocratic governance. Prefers moral discernment, ethical design, and meaningful accountability over laissez-faire deployment. | Soft-law guidance for states: implement through laws, standards, sandboxes, procurement, and sectoral oversight. Interoperability and flexibility are central, but enforcement is left to adherents. |
| <b>Labor and Automation</b>        | Worker-first in rhetoric, but mainly through AI literacy, skilled-trades policy, apprenticeships, and infrastructure-oriented workforce development. Emphasis on adaptation and productivity growth rather than distributive justice. | Work is integral to human dignity. Automation is acceptable only if it serves the worker and the vulnerable, avoids exclusion, and respects the moral meaning of labor reflected in <i>Rerum Novarum</i> .      | Explicit focus on preparing for labor-market transformation, building human capacity, and encouraging inclusive growth alongside innovation.                                                         |
| <b>Privacy And Data Protection</b> | Recognized in federal-use guidance and some Action Plan measures, but treated as one constraint within a broader innovation program. No overarching rights-centered privacy philosophy specific to AI.                                | Privacy is tied to dignity, freedom, and resistance to surveillance overreach. The person must never be reduced to data, social scoring, or manipulative profiling.                                             | Privacy is built into the principles themselves and linked to fairness, rights, transparency, and trustworthy governance.                                                                            |
| <b>Military &amp; AI Security</b>  | Extensive emphasis on intelligence, cyber defense, export controls, secure AI infrastructure, adversary exclusion, and strategic AI leadership. Security is a constitutive objective, not a side issue.                               | Warns strongly against autonomous weapons, militarized AI, and technologies that widen war or remove human responsibility in life-and-death decisions.                                                          | Addresses security chiefly through robustness, safety, resilience, and international cooperation; less explicit on military doctrine than the U.S. or Francis's peace-oriented warnings.             |
| <b>Global Cooperation</b>          | Prefers U.S.-led diffusion of American AI stacks, standards, and alliances. Cooperative, but on terms that reinforce U.S. primacy and counter rivals.                                                                                 | Advocates broad inclusion of all stakeholders, especially the poor and unheard, and favors international norms or treaties that protect humanity and peace.                                                     | The most explicitly multilateral framework: designed for cross-border cooperation, shared vocabulary, and interoperable national approaches.                                                         |

While the Trump administration prioritizes economic growth and technological leadership with minimal regulation,<sup>185</sup> the Catholic Church emphasizes ethical considerations, human dignity, and the need for international cooperation in the development and deployment of AI technologies. Interestingly, the previous administration's approach hewed more closely to the Church's perspective: "While the Biden administration's AI Executive Order emphasized ethical guidelines and guardrails, Trump's approach—heavily shaped by figures like Elon Musk—focuses on creating a freer environment for AI development."<sup>186</sup>

Succinct statement belies the complexity of the differences between the Trumpian and papal perspectives, and the weight of the implications of such differences in perspective. It also hides some of the areas of potential overlap, while dashing some assumptions. While the Trump Plan assumes that lack of regulation will equate to opportunities for AI dominance, that is not necessarily the case. That is because a US

. . . regulatory void could put the US at a further disadvantage because US-built AI systems will continue to be regulated elsewhere—including in the EU, Japan, Canada, Australia, and the UK. In other words, AI systems will still face costly regulation, but the benefits of that regulation may not accrue to US consumers.<sup>187</sup>

Certainly, the sharp contrasts between existing regulatory models continue to complicate the landscape for AI advancement and adoption. Within this context, the FTC's approach to regulation will also influence its standing with global counterparts, and navigating this terrain demands careful balance.<sup>188</sup>

#### CONCLUDING THOUGHTS

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<sup>185</sup> As Sayegh, *supra* note 15, has noted:

The Republican tech agenda, with its emphasis on fostering innovation and reducing regulatory burdens, combined with influential voices like Elon Musk advocating for bold, unrestrained advancements, suggests a future where the U.S. tech sector could undergo significant transformation. The next four years could redefine the trajectory of American technological leadership, with lasting ripple effects on global innovation, regulation, and competitiveness for decades to come. For companies ready to adapt and seize the moment, this era could mark the beginning of unparalleled growth and influence.

<sup>186</sup> *Id.*

<sup>187</sup> Tyler et al., *supra* note 46, at 5, 7.

<sup>188</sup> *Id.*

The Trump administration's approach to AI regulation is, at its core, a declaration of trust in the industry itself. The administration's executive orders, memoranda, and policy statements collectively argue that innovation thrives only when freed from bureaucratic constraint—seemingly of any kind or degree.<sup>189</sup> This view holds that those best suited to govern the future of artificial intelligence are those building it—the technologists, entrepreneurs, and private actors with the deepest domain expertise. The underlying premise is clear: to reach AI's full potential as quickly as possible, the “temple” of technological advancement must be overseen by its high priests. Under the Trump administration, concerns for human rights and existential threats are disregarded or downplayed in furtherance of “winning” the AI arms race by establishing American dominance of the AI field.

But the Catholic Church, like the OECD, the Center for AI Safety,<sup>190</sup> and a growing chorus of other voices, including the evangelical Christian base that has propelled Trump politically,<sup>191</sup> are sounding a clear and ancient warning. Such deference to concentrated power within the AI sector risks turning the temple into something altogether different. In the Gospel of Matthew, we are reminded of what happens when those entrusted with sacred spaces begin to exploit them for profit:

And Jesus went into the temple of God, and cast out all them that sold and bought in the temple, and overthrew the tables of the moneychangers . . . And said unto them, It is written, *My house shall be called the house of prayer*; but ye have made it *a den of thieves*.<sup>192</sup>

This passage underscores a key dimension of the Church's concern: that permitting AI's most powerful creators to police themselves

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<sup>189</sup> *Id.* at 5 (“The policy shift in the executive branch, as reflected in the titles of the two EOs, is from a policy of caution about the potential risks of AI to one of removing perceived regulatory obstacles to a ‘national champion’ industry”).

<sup>190</sup> Center for AI Safety, *Statement on AI Risk*, CTR. FOR AI SAFETY, <https://aistatement.com> (“Mitigating the risk of extinction from AI should be a global priority alongside other societal-scale risks such as pandemics and nuclear war”) (last visited Aug. 11, 2025).

<sup>191</sup> See, e.g., Billy Perrigo, *With Letter to Trump, Evangelical Leaders Join the AI Debate*, TIME, (May 21, 2025), <https://time.com/7287333/ai-trump-pope-leo-evangelical-leaders/> (expressing loyalty and admiration for President Trump but noting that winning the AI race “must not be a victory at any cost” and echoing some themes from the Vatican).

<sup>192</sup> *Matthew* 21:12–13 (KJV) (emphasis added).

is not wisdom, but abdication. It is akin to giving the money changers dominion over the Temple and expecting them to uphold its sanctity. The Church's call for ethical oversight, moral limits, and global accountability is not obstructionist—it is prophetic. It insists that the very *image* **and** *subscription* imprinted on AI must reflect not merely power but justice, not merely intelligence but wisdom.

Following the line of the Church's thinking, one may ask: what is the point of the Trump administration's goal of "winning" an AI race if the result is to cross the finish line into a world which few Americans today would wish for their children and grandchildren to inherit?

Assuming, *arguendo*, that leaders in AI development are best equipped to see what such a world may look like, consider the numerous statements already put on record by these very leaders. Not unlike the nuclear scientists of the Manhattan Project, some of the leading experts on AI development appear to know only too well that, unchecked, AI development could result in another doomsday device. For example, consider the following statements, collected with some help of ChatGPT 5.0,<sup>193</sup> from just such leaders:

| Developer/<br>Organization | Quote |
|----------------------------|-------|
|----------------------------|-------|

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<sup>193</sup> AI Risk Quotes gathered and compiled by Greg Krabacher on August 8, 2025 using Chat GPT 5.0 with the following prompts:

Prompt 1: Provide the most relevant quotes from major artificial intelligence developers expressing concern about the risks that AI poses to humanity.

Prompt 2: Provide specific citations for each quote in ABA format.

Prompt 3: If you want, I can organize this into a clean two-column PDF table with developer on one side and quote + citation on the other for quick reference. That way it's ready for academic or policy use. YES

[The resulting information, available here:](https://chatgpt.com/s/t_6898e19e038881919ce8ba619336c873)  
[https://chatgpt.com/s/t\\_6898e19e038881919ce8ba619336c873](https://chatgpt.com/s/t_6898e19e038881919ce8ba619336c873). The author selected quotes from the AI generated report for inclusion, each of which was then re-formatted, checked, and revised in the present table format. Individual citations provided *infra*.<sup>194</sup> *Oversight of A.I.: Rules for Artificial Intelligence Before the S. Comm. on the Judiciary*, 118th Cong. 13 (May 16, 2023) (statement of Sam Altman, CEO, OpenAI).

|                                           |                                                                                                                                                                                                                                                     |
|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sam Altman<br>(OpenAI CEO)                | “If this technology goes wrong, it can go quite wrong, and we want to be vocal about that.” <sup>194</sup>                                                                                                                                          |
| Ilya Sutskever<br>(OpenAI)                | “But the vast power of superintelligence could also be very dangerous and could lead to the disempowerment of humanity or even human extinction. While superintelligence seems far off now, we believe it could arrive this decade.” <sup>195</sup> |
| Geoffrey Hinton (Google executive)        | “It’s not inconceivable” that AI could “wip[e] out humanity.” <sup>196</sup>                                                                                                                                                                        |
| Yoshua Bengio<br>(AI pioneer)             | “We should take even a small probability of catastrophic outcomes of super-dangerous AI seriously.” <sup>197</sup>                                                                                                                                  |
| Dario Amodei<br>(Anthropic CEO)           | There’s a “between 10% and 25%” chance “something goes really quite catastrophically wrong on the scale of human civilization.” <sup>198</sup>                                                                                                      |
| Demis Hassabis<br>(Google DeepMind CEO)   | “We must take the risks of AI as seriously as . . . climate change . . . We can’t afford the same delay.” <sup>199</sup>                                                                                                                            |
| Mustafa Suleyman<br>(DeepMind co-founder) | Powerful AI should be “licensed . . . to ensure the survival of humanity”; we need “containment.” <sup>200</sup>                                                                                                                                    |

<sup>194</sup> *Oversight of A.I.: Rules for Artificial Intelligence Before the S. Comm. on the Judiciary*, 118th Cong. 13 (May 16, 2023) (statement of Sam Altman, CEO, OpenAI).

<sup>195</sup> Ali Azhar, *OpenAI Sets Ambitious Course Toward Superintelligence*, HPC WIRE (Jan. 7, 2025), <https://www.aiwire.net/2025/01/07/openai-sets-ambitious-course-toward-superintelligence/>.

<sup>196</sup> Andrea Vacchiano, *Artificial Intelligence ‘Godfather’ on AI Possibly Wiping Out Humanity: ‘It’s Not Inconceivable,’* FOX NEWS (Mar. 25, 2023), <https://www.foxnews.com/tech/artificial-intelligence-godfather-ai-possibly-wiping-humanity-not-inconceivable>.

<sup>197</sup> Yoshua Bengio, *FAQ on Catastrophic AI Risks*, YOSHUA BENGIO (June 24, 2023), <https://yoshuabengio.org/2023/06/24/faq-on-catastrophic-ai-risks/>.

<sup>198</sup> Eric Newcomer, *AI Kills Us All (with Daniel H. Wilson)*, NEWCOMER (Oct. 17, 2023), <https://www.newcomer.co/p/ai-kills-us-all-with-daniel-h-wilson>.

<sup>199</sup> Dan Milmo, *AI Risk Must Be Treated as Seriously as Climate Crisis, Says Google DeepMind Chief*, GUARDIAN (Oct. 24, 2023), <https://www.theguardian.com/technology/2023/oct/24/ai-risk-climate-crisis-google-deepmind-chief-demis-hassabis-regulation>.

<sup>200</sup> Ryan Heath, *AI Pioneer Mustafa Suleyman: AI Needs a “Containment” Plan*, AXIOS (Sep. 6, 2023), <https://www.axios.com/2023/09/06/mustafa-suleyman-ai-containment-plan>; see also MUSTAFA SULEYMAN, *THE COMING WAVE: TECHNOLOGY, POWER, AND THE TWENTY-FIRST CENTURY’S GREATEST DILEMMA* 305–06 (2023).

|                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sundar Pichai<br>(Alphabet CEO)                      | AI “keeps me up at night,” and “will be as good or as evil as human nature allows.” <sup>201</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Elon Musk<br>(leading<br>technology<br>entrepreneur) | “I think we should be very careful about artificial intelligence. If I had to guess at what our biggest existential threat is, it’s probably that. So we need to be very careful with artificial intelligence..<br>I’m increasingly inclined to think that there should be some regulatory oversight, maybe at the national and international level, just to make sure that we don’t do something very foolish. With artificial intelligence we’re summoning the demon. You know those stories where there’s the guy with the pentagram, and the holy water, and he’s like — Yeah, he’s sure he can control the demon? Doesn’t work out.” <sup>202</sup> |
| Shane Legg<br>(DeepMind co-founder)                  | On AI-caused human extinction risk: “Maybe 5%, maybe 50% . . . I don’t think anybody has a good estimate.” <sup>203</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Stuart Russell<br>(UC Berkeley/<br>CHAI)             | AI success could be “the biggest event in human history . . . and perhaps the last.” <sup>204</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

Therefore, if the Trump administration AI Action plan unleashes short-term competitive impulses and zero-sum, transactional mentalities, these AI experts’ statements suggest that risks abound. At a minimum, human dignity becomes less and less relevant and human capacity is dulled as humans become conditioned to increasingly submit to the technology, enriching a few, but potentially diminishing or working around multitudes. Rather than enhancing human existence, AI that develops without concern for human dignity risks the outsourcing of

<sup>201</sup> Scott Pelley, *Is artificial intelligence advancing too quickly? What AI leaders at Google say*, ‘60 Minutes - Newsmakers’ (Apr. 16, 2023), <https://www.cbsnews.com/news/google-artificial-intelligence-future-60-minutes-transcript-2023-04-16/>.

<sup>202</sup> Greg Kumparak, , *Elon Musk Compares Building Artificial Intelligence To “Summoning The Demon”*, (Oct. 26, 2014), <https://techcrunch.com/2014/10/26/elon-musk-compares-building-artificial-intelligence-to-summoning-the-demon/?ncid=rss>.

<sup>203</sup> Sam Shead, *DeepMind’s Elusive Third Cofounder Is the Man Making Sure That Machines Stay on Our Side*, BUSINESS INSIDER (Jan. 26, 2017), <https://www.businessinsider.com/shane-legg-google-deepmind-third-cofounder-artificial-intelligence-2017-1>.

<sup>204</sup> Stuart Russell, *HUMAN COMPATIBLE: ARTIFICIAL INTELLIGENCE AND THE PROBLEM OF CONTROL 1* (2019).

the human experience to a technology that tells people what to do, think, feel, and believe.

Such outcomes also run counter to thousands of years of Judeo-Christian teaching and philosophy, which firmly establish humankind as having dominion over the world:

Then God said, “Let us make man in our image, after our likeness. And let them have dominion over the fish of the sea and over the birds of the heavens and over the livestock and over all the earth and over every creeping thing that creeps on the earth.”<sup>205</sup>

The Church would say that this dominion is not a responsibility humanity should abdicate, nor is any human at liberty to do so on behalf of any other human.

Exchanging humanity’s dominion for improved efficiency and geo-political positioning in the short term is neither a “good deal” nor one that any government has rightful authority to strike on behalf of humanity generally. But, by abdicating its responsibility for AI development, and instead trusting a small group of powerful AI technologists to “play God” and do as they will, the Trump administration is effectively flipping the script:

Then [Trump’s AI Action Plan] said, “Let us make [AI] in our image, after our likeness. And let [AI] have dominion over the fish of the sea and over the birds of the heavens and over the livestock and over all the earth and over every creeping thing that creeps on the earth[, including humankind].”

The contrast between these two visions is a stark one. Where the Trump framework invites those shaping AI to mark their own coin and circulate it freely, the Church reminds the world that the values minted into this new creation will determine not only its utility but its humanity, not only its value but its values. And as the world casts the coin of AI, it must ask not only whose image it bears—but whose authority it serves.

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<sup>205</sup> *Genesis* 1:26 (NIV); see also *Genesis* 1:26, in *THE TORAH: THE FIVE BOOKS OF MOSES* (Jewish Publ’n Soc’y trans., 2d ed. 1999).