

Background Note:

AI Chatbots and the Misuse of Generated Content: Human Accountability, Verification, AI Hallucinations, and Emerging Institutional Risks





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Executive Summary

This Background Note, entitled “AI Chatbots and the Misuse of Generated Content: Human Accountability, Verification, AI Hallucinations, and Emerging Institutional Risks”, has been prepared by the Centre for Global Studies (CGS), a special program of the Parliamentary Assembly of the Mediterranean (PAM). It examines emerging challenges associated with the growing use of AI chatbots in professional and institutional environments, with particular attention to source verification, professional accountability, and the risks associated with relying on unverified AI-generated content.

The rapid adoption of AI chatbots has transformed how individuals and institutions create, organize, and communicate information. While these technologies offer significant benefits in drafting, translation, research assistance, summarization, and information management, they were developed as generative tools intended to support content creation rather than replace professional expertise, legal review, scientific validation, technical assessment, or independent research. The Background Note argues that the principal challenge does not arise from the technology itself, but from the misuse and limits of generated content and the growing tendency to treat AI-generated outputs as authoritative information rather than content requiring independent verification. This concern is particularly relevant in sectors such as law, healthcare, engineering, scientific research, and public administration, where decisions depend on verified information, professional standards, and public trust.

Recent legal cases examined in the United States, France, and Italy illustrate how the so-called AI-generated hallucinations, fabricated citations, and unverified references have increasingly

appeared in professional settings, resulting in sanctions, judicial criticism, and broader discussions regarding professional responsibility. These developments demonstrate that concerns surrounding AI-generated content has evolved beyond educational settings and now affect professional and institutional decision-making processes.

The Note concludes that effective governance should focus on strengthening AI literacy, promoting user awareness, establishing appropriate professional safeguards, and maintaining human review and source verification in consequential decision-making processes. As AI technologies continue to evolve rapidly, ensuring their responsible use has become an increasingly urgent requirement for preserving institutional integrity, professional standards, and public confidence.

Introduction

1. This Background Note has been prepared by the Centre for Global Studies (CGS), a special program of the Parliamentary Assembly of the Mediterranean (PAM). It examines emerging challenges associated with the use of AI chatbots in professional and institutional settings, focusing on source verification, professional accountability, and recent legal cases illustrating the consequences of relying on unverified AI-generated content.
2. The emergence of widely accessible AI chatbots has transformed how individuals, institutions, and professionals access, organize, and generate information. Within a relatively short period, these tools have become integrated into educational, professional, research, and administrative activities, supporting drafting, translation, summarization, analysis, and content development.
3. The rapid adoption of AI chatbots has also contributed to a growing misunderstanding regarding their intended function and limits. While designed to assist users in creating, organizing, refining, and presenting content, these systems were not intended to replace professional expertise, legal review, scientific validation, technical assessment, or independent research. Their outputs should therefore be regarded as supportive rather than authoritative and remain subject to independent verification.
4. This distinction is particularly important in fields such as law, healthcare, engineering, scientific research, public administration, and industries involving pharmaceutical, chemical, or technical processes, where decisions depend on verified information and professional standards. The central challenge is therefore not the existence of AI chatbot technology itself, but the growing tendency to treat AI-generated outputs as authoritative information rather than generated content requiring independent verification.

Understanding the Intended Role of AI Chatbots

5. A significant factor underlying many recent controversies is a misunderstanding of the intended role and limits of AI chatbots. Since their public introduction, these systems have largely been presented as tools intended to assist users in content creation, communication, and information management. As generative technologies, they were designed to support users in drafting, organizing, refining, translating, and presenting content. Their value lies in supporting communication, creativity, research assistance, and information management rather than serving as authoritative repositories of verified facts.
6. The ability to generate new content in response to user instructions is one of the technology's principal strengths. It enables AI chatbots to support drafting, research assistance, information management, and a wide range of professional and creative activities. The quality and reliability of AI-generated outputs, however, are closely influenced by the information, sources, and instructions provided by the user. As a result, inaccurate information, unsupported assertions, or fabricated references, the so-called AI hallucinations, may be generated when outputs are relied upon without independent verification.
7. Many of the challenges observed in recent years stem not from the technology itself, but from its misuse in contexts where professional research, legal verification, scientific validation, technical assessment, and expert judgment remain essential. The case studies presented in the following sections demonstrate how such misuse can affect professional and institutional decision-making processes.

From Educational Concerns to Institutional Risks

8. The earliest public concerns surrounding AI chatbots emerged within educational settings following their widespread public adoption in 2022 and 2023¹. Schools, universities, and research institutions were among the first sectors required to address issues related to academic integrity, authorship, and the appropriate use of AI-generated content in learning and research activities²⁻³.

¹ OpenAI. (30 November 2022). *Introducing ChatGPT*. OpenAI. Available at: <https://openai.com/index/chatgpt/>

² UNESCO. (2023). *Guidance for Generative AI in Education and Research*. Paris: United Nations Educational, Scientific and Cultural Organization (UNESCO). Available at: <https://unesdoc.unesco.org/ark:/48223/pf0000386693>

³ UNESCO. (7 September 2023). *Guidance for Generative AI in Education and Research*. United Nations Educational, Scientific and Cultural Organization (UNESCO). <https://www.unesco.org/en/articles/guidance-generative-ai-education-and-research>

9. By 2025 and 2026, however, concerns had expanded well beyond education and increasingly affected professional and institutional environments⁴. Key developments included:

- The emergence of AI hallucinations, fabricated citations, and misleading summaries;
- The expansion of concerns from educational settings to professional and institutional activities;
- Growing implications for legal rights, public interests, healthcare, scientific research, and public administration;
- A shift in focus from detecting AI-generated content to ensuring its verification, reliability, and appropriate use in decision-making processes.

Recent Legal Cases Illustrating the Challenge

10. Recent legal proceedings in multiple jurisdictions have highlighted a growing challenge associated with the use of AI chatbots in professional environments. A growing body of documented cases has shown that AI-generated content may include inaccurate, unverifiable, or entirely fabricated information that nevertheless appears credible and authoritative, a phenomenon commonly referred to as AI hallucinations. The increasing number of reported incidents involving AI hallucinations⁵ in legal and professional settings demonstrates that the principal risk arises not from the generation of such content itself, but from the decision to rely on it without applying the level of review, validation, and professional diligence required by the relevant profession⁶.
11. A notable example emerged in the United States in 2026, when several federal courts addressed cases involving AI-generated fictitious legal citations and authorities contained in court filings. In a number of proceedings, judges concluded that attorneys had failed to verify AI-generated content before submitting it to the courts, resulting in sanctions, financial penalties, and, in one case, the disqualification of legal counsel. These incidents

⁴ OECD. (2025). *Governing with Artificial Intelligence: The State of Play and Way Forward in Core Government Functions*, including Chapter 10, *AI in Public Service Design and Delivery*. OECD Publishing, Paris. Available at: https://www.oecd.org/en/publications/2025/06/governing-with-artificial-intelligence_398fa287.html and https://www.oecd.org/en/publications/2025/06/governing-with-artificial-intelligence_398fa287/full-report/ai-in-public-service-design-and-delivery_09704c1a.html

⁵ National Institute of Standards and Technology (NIST). (2024). *Artificial Intelligence Risk Management Framework: Generative Artificial Intelligence Profile (NIST AI 600-1)*. U.S. Department of Commerce, National Institute of Standards and Technology. Available at: <https://nvlpubs.nist.gov/nistpubs/ai/NIST.AI.600-1.pdf>

⁶ Damien Charlotin. (n.d.). *AI Hallucination Cases Database*, documenting judicial decisions worldwide involving fabricated citations, hallucinated authorities, and AI-generated content in legal proceedings. Available at: <https://www.damiencharlotin.com/hallucinations/>

attracted significant attention because they demonstrated how AI hallucinations can move beyond theoretical concerns and directly affect judicial processes⁷⁻⁸⁻⁹.

12. Similar concerns have also emerged in Europe. In France, legal experts, professional bodies, and judicial stakeholders have increasingly examined the risks associated with the use of generative AI in legal research and court submissions, particularly where AI-generated citations or supporting authorities are incorporated without independent validation. Recent discussions have emphasized that lawyers remain personally responsible for verifying legal authorities and references used in judicial proceedings, despite the growing use of AI-assisted legal tools. These developments have contributed to broader debates regarding professional responsibility and the appropriate use of AI within legal practice¹⁰⁻¹¹.
13. Italian courts have likewise addressed cases involving AI-generated legal content containing inaccurate or unverifiable references. In several instances, including proceedings before the Tribunals of Florence, Turin, and Siracusa, judges identified citations that either did not exist or could not be traced to authentic judicial sources¹². These cases reinforced a fundamental legal principle: responsibility for the accuracy and reliability of submitted material remains with the legal professional, regardless of the technology used in its preparation. Recent judicial responses have also demonstrated that the submission of fabricated AI-generated legal authorities may result in sanctions where lawyers fail to exercise the professional diligence required to verify the accuracy of their filings¹³⁻¹⁴.

⁷ Reuters. (16 March 2026). *US Appeals Court Fines Lawyers \$30,000 in Latest AI-Related Sanction*. Reuters. <https://www.reuters.com/legal/litigation/us-appeals-court-fines-lawyers-30000-latest-ai-related-sanction-2026-03-16/>

⁸ Reuters. (3 June 2026). *US Appeals Court Sanctions Lawyers over AI 'Hallucinations,' Lack of Candor*. Reuters. <https://www.reuters.com/legal/litigation/us-appeals-court-sanctions-lawyers-over-ai-hallucinations-lack-candor-2026-06-03/>

⁹ Reuters. (9 June 2026). *Judge Rules Both Sides in Lawsuit Misused AI, Disqualifies Lawyers*. Reuters. <https://www.reuters.com/legal/litigation/judge-rules-both-sides-lawsuit-misused-ai-disqualifies-lawyers-2026-06-09/>

¹⁰ Morgan, Lewis & Bockius LLP. (18 March 2026). *The Risks of Hallucinations and Misuse of Generative Artificial Intelligence Before French Courts*. Morgan Lewis. <https://www.morganlewis.com/pubs/2026/03/the-risks-of-hallucinations-and-misuse-of-generative-artificial-intelligence-before-french-courts>

¹¹ Darrois Villey Maillot Brochier. (2025). *Generative AI: a Tool of Assistance, Not of Decision. Implications for Judges and Lawyers in France*. <https://www.ddg.fr/actualite/generative-ai-a-tool-of-assistance-not-of-decision-implications-for-judges-and-lawyers-in-france>

¹² Fanpage.it. (5 April 2025). *A Lawyer Used ChatGPT Without Verifying the Information: How It Was Discovered*. Fanpage.it. Available at: <https://www.fanpage.it/innovazione/tecnologia/un-avvocato-ha-usato-chatgpt-senza-verificare-le-informazioni-come-e-stato-scoperto/>

¹³ Open Online. (17 March 2026). *Lawyer Sanctioned for Citing Non-Existent Judgments Generated by Artificial Intelligence before the Tribunal of Siracusa*. Open Online. Available at: <https://www.open.online/2026/03/17/avvocato-sanzionato-sentenze-inventate-ai-siracusa/>

¹⁴ Il Periscopio del Diritto. (2026). *Gross Negligence Found against a Lawyer Who Used Artificial Intelligence and Cited Non-Existent Judgments*. Il Periscopio del Diritto. Available at: <https://www.ilperiscopiodeldiritto.it/1/colpa-grave-per-avvocato-che-utilizza-intelligenza-artificiale-e-cita-sentenza-inesistenti/>

14. Taken together, these developments demonstrate that the challenges associated with AI chatbots are no longer confined to educational settings. The case studies presented above illustrate how misunderstandings regarding the intended role of AI chatbots can affect professional and institutional decision-making processes when generated content is relied upon without appropriate verification.

Governance Responses and the Way Forward

15. The growing use of AI chatbots across professional and institutional environments highlights the need for governance frameworks capable of supporting their responsible integration into decision-making processes, particularly in sectors where decisions may affect legal rights, public safety, public policy, health, financial interests, or other matters of significant public concern. Recent institutional initiatives also demonstrate the emergence of practical governance measures. For example, in 2025, the French Senate adopted a Charter on the Use of Generative Artificial Intelligence Tools, establishing principles for the responsible use of AI by parliamentary staff, including human oversight, verification of AI-generated outputs, confidentiality, and compliance with professional obligations¹⁵.

16. In this context, consideration should be given to measures aimed at promoting the responsible use of AI-generated content, including:

- Strengthening AI literacy and user awareness;
- Developing professional guidelines for high-consequence sectors;
- Establishing training and competency standards for the responsible use of AI-generated content;
- Maintaining human review and source verification in consequential decision-making processes.

17. Particular attention may also be required for professions whose decisions directly affect legal rights, public safety, health, financial interests, or public administration, where reliance on unverified AI-generated content may have consequences extending beyond the individual user and affect broader institutional processes and public trust.

¹⁵ French Senate. (15 May 2025). Charter on the Use of Generative Artificial Intelligence Tools within the French Senate (Charte d'utilisation des outils d'intelligence artificielle générative au Sénat). Adopted by the Bureau of the French Senate. Available at: https://www.senat.fr/fileadmin/Connaitre_le_Senat/Fiches_techniques/Fonction_publique_senatoriale/Charte_utilisation_IA_15Mai2025_BureauSenat.pdf

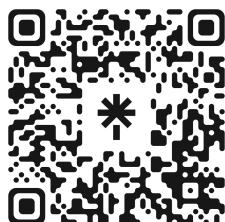
18. The objective of effective governance should not be to restrict technological innovation, but to ensure that AI chatbots are used in a manner that supports institutional integrity, professional standards, and public trust.

Conclusion

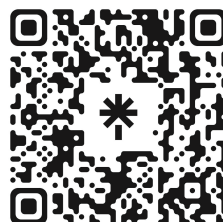
19. The legal cases discussed in this note demonstrate that the risks associated with AI-generated content are no longer confined to educational settings, but increasingly affect sectors where decisions may influence legal rights, public interests, professional responsibilities, and institutional credibility. They also illustrate the central concern addressed in this note: the misuse of AI chatbots begins when tools designed to assist in content generation are treated as authoritative sources of verified information.
20. The value of AI chatbots lies in their ability to assist users in organizing information, developing ideas, drafting documents, and accelerating routine tasks. However, these systems were designed to support content generation rather than serve as authoritative sources of verified information. Verification of facts, validation of sources, professional judgment, and accountability for decisions therefore remain human responsibilities that cannot be delegated to automated systems.
21. The speed at which AI technologies are evolving and being adopted across society leaves limited time for institutions, regulators, and professional communities to adapt. As the use of AI-generated content continues to expand, the absence of timely safeguards, training standards, and verification practices may increase the risk of errors, misinformation, and flawed decision-making becoming embedded across professional and institutional processes. Proactive governance and user awareness are therefore becoming increasingly urgent rather than merely desirable.
22. The challenge is therefore not whether AI chatbots should be used, but how they can be integrated responsibly into professional and institutional processes while maintaining appropriate safeguards, transparency, and accountability.

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