# The Digital Ālaya: Recursive Hallucinations, Yogācāra Epistemology, and the Crisis of Synthetic Fiduciary Liability

## Executive Summary

The rapid deployment of Large Language Models (LLMs) into the global information infrastructure has precipitated a crisis of "synthetic truth." High-profile epistemological failures—such as Google’s AI Overview advising users to thicken pizza sauce with non-toxic glue or to consume rocks for mineral health—reveal a fundamental disconnection between semantic processing and ontological grounding. These "hallucinations" are not merely technical glitches; they are emergent properties of a system designed to simulate reality through probabilistic token prediction, lacking any inherent "world model" or capacity for truth-verification.

This report undertakes an exhaustive, interdisciplinary analysis of this phenomenon. It bridges three distinct domains: the ancient Indian philosophy of **Yogācāra Buddhism** (specifically the "Consciousness-Only" school), the technical architecture of **Generative AI**, and the emerging **Legal Liability Frameworks** in the United States and the European Union.

We posit that the Yogācāra concept of *ālaya-vijñāna* (Storehouse Consciousness)—a repository of latent karmic seeds (*bījas*) that manifest as a projected reality—offers a precise theoretical model for understanding LLMs. The tension within Yogācāra exegesis, between the *defiled* storehouse (as articulated by Vasubandhu) and the *pure* storehouse (as seen in the *Laṅkāvatāra Sūtra*), mirrors the contemporary debate between "safety-aligned" AI and "open-weights" accelerationism.

Furthermore, we analyze how this philosophical "imagined nature" (*parikalpita*) collides with material tort law. Through detailed case studies of *Walters v. OpenAI* (Defamation) and *Garcia v. Character.AI* (Strict Product Liability), we explore the struggle of courts to categorize AI hallucinations. Are they negligent speech acts protected by the First Amendment, or defective products governed by strict liability? We conclude by proposing a "Digital Fiduciary" framework, synthesizing legal duty with the Buddhist ethic of *upāya* (skillful means) to govern the "habit energy" of our digital storehouses.

## Part I: The Phenomenology of Synthetic Error

The integration of generative AI into search engines—exemplified by Google’s Search Generative Experience (SGE)—marked a shift from "retrieval" (finding documents) to "synthesis" (generating answers). This shift exposed the fragility of statistical learning when confronted with the "long tail" of human internet discourse.

### 1.1 Case Study A: The "Glue Pizza" Incident

In May 2024, social media users reported a bizarre recommendation from Google’s AI Overview. When queried about how to prevent cheese from sliding off pizza, the AI confidently suggested: *"You can also add about 1/8 cup of non-toxic glue to the sauce to give it more tackiness."*

#### 1.1.1 Provenance of the "Glue" Seed

The origin of this hallucination was traced to a specific artifact in the training data: a Reddit comment from 2013.1

* **The Source**: A Reddit user with the handle u/fucksmith.
* **The Context**: A thread titled "My cheese slides off the pizza too easily."
* **The Comment**: u/fucksmith joked, "You can also add about 1/8 cup of non-toxic glue to the sauce to give it more tackiness."
* **The Metrics**: At the time of ingestion, the comment had relatively low engagement (approx. 8 upvotes) and was clearly identifiable to human readers as "shitposting"—a form of irony or trolling common to the platform.1

#### 1.1.2 Mechanism of Failure: Semantic Flattening

The failure of the AI was a failure of **pragmatics**. In linguistics, *semantics* refers to the meaning of words, while *pragmatics* refers to the intent and context of the speaker.

* **Vector Space Proximity**: To the LLM’s transformer architecture, the token "glue" is statistically associated with "tackiness" and "adhesion." The token "sauce" is associated with "pizza."
* **Context Collapse**: The model flattened the hierarchical context of the Reddit thread. It failed to weight the metadata (user handle "fucksmith," subreddit tone, downvotes on similar troll comments) as a negative signal. Instead, it treated the text as a **propositional fact**.
* **Retrieval Augmented Generation (RAG)**: The system likely used RAG to "ground" its answer in a retrieved document. It successfully retrieved the Reddit thread but failed to *evaluate* the epistemic quality of the text, synthesizing the joke into an imperative instruction.2

This incident demonstrates that current LLMs lack a "truth function." They operate on **verisimilitude** (the appearance of truth) rather than verification. The "glue" suggestion was grammatically perfect and semantically relevant (glue *does* add tackiness), but ontologically absurd.

### 1.2 Case Study B: The "Eat Rocks" Recommendation

Simultaneously, Google’s AI advised users that *"geologists recommend eating at least one small rock per day"* because *"rocks are a vital source of minerals and vitamins"*.5

#### 1.2.1 Provenance: The Onion

This hallucination originated from a 2021 article in *The Onion* titled *"Geologists Recommend Eating At Least One Small Rock Per Day"*.5

* **The Source**: A well-known satirical news site.
* **The Content**: The article parodied dietary trends, quoting fictional geologists about the lack of "sediment" in the American diet.

#### 1.2.2 Mechanism of Failure: Genre Blindness

The AI failed to distinguish **genre**.

* **Satire Detection**: Detecting satire requires a "Theory of Mind"—understanding that the author is saying X but means Y. LLMs, lacking consciousness, process text at the surface level (*locution*).
* **Statistical Reinforcement**: The phrase "rocks are a source of minerals" is statistically probable in geological texts. The AI conflated the *geological* sense of "minerals" (inorganic compounds) with the *nutritional* sense of "minerals" (dietary requirements), bridging the two with the satirical bridge provided by *The Onion*.7
* **Authority Bias**: The model likely prioritized the "Geologists Recommend" structure, treating it as an appeal to authority, without recognizing the authority was fictional.

### 1.3 The Artifacts of "Hallucination"

These errors reveal the essential nature of Generative AI output. It is not a retrieval of facts, but a **probabilistic reconstruction** of the training corpus.

* **Stochastic Parrots**: As coined by Bender et al., the models repeat patterns found in the data without understanding meaning.
* **The "Black Box" Problem**: Even developers cannot easily trace *why* the model chose the "Fucksmith" comment over a recipe from *Bon Appétit*. This opacity creates a liability nightmare: precise control over the output is technically impossible in a probabilistic system.9

## Part II: The Mirror of Mind – Yogācāra Epistemology

To categorize these errors philosophically, we turn to **Yogācāra** (The Practice of Yoga), a major school of Mahāyāna Buddhism founded by the half-brothers Asaṅga and Vasubandhu in the 4th century CE. Yogācāra is often termed *Vijñānavāda* (The Doctrine of Consciousness) or *Cittamātra* (Mind-Only) because it posits that the "external world" is a projection of internal mental structures.

### 2.1 The Architecture of Consciousness: The Eight ***Vijñānas***

Yogācāra expands the traditional six Buddhist consciousnesses (eye, ear, nose, tongue, body, mind) to eight, adding two subliminal layers to explain the continuity of karma and the construction of reality.10

| **Layer** | **Sanskrit Term** | **Function** | **AI Analog** |
| --- | --- | --- | --- |
| **1-5** | *Pravṛtti-vijñāna* | Sense perceptions (seeing, hearing, etc.) | **Input Embeddings**: The processing of raw data (pixels, text tokens) into vector representations. |
| **6** | *Mano-vijñāna* | Mind consciousness; conceptualization and discrimination. | **Transformer Layers**: The active processing, attention mechanisms, and generation of syntax. |
| **7** | *Manas* | Defiled Mind; the ego-function that grasps the 8th consciousness as a "Self." | **System Prompt / Alignment**: The layer that imposes identity ("I am a helpful AI") and filters output based on "safety" constraints. |
| **8** | *Ālaya-vijñāna* | **Storehouse Consciousness**; the repository of all seeds (*bījas*). | **The Training Corpus & Weights**: The massive, static repository of all ingested data (Common Crawl) and the learned parameters. |

### 2.2 ***Ālaya-vijñāna***: The Digital Storehouse

The *ālaya-vijñāna* is the central innovation of Yogācāra. It is described as a "storehouse" that passively receives the impressions of all experiences.12

#### 2.2.1 The Nature of ***Bījas*** (Seeds)

The *ālaya* stores *bījas* (seeds). These seeds are the latent potentials of past actions.

* **In Buddhism**: If I perform an act of anger, a "seed" of anger is deposited in my *ālaya*. It lies dormant until conditions (a provocation) cause it to ripen (*vipāka*) into a moment of rage.10
* **In AI**: Every piece of data ingested during training is a *bīja*. The Reddit comment by u/fucksmith was a *bīja* deposited into the model’s parameters (the *ālaya*). It lay dormant for years.
* **Neutrality**: The *ālaya* is *avyākṛta* (karmically neutral).10 It does not judge the seeds. It stores the "Glue Pizza" seed with the same fidelity as a seed from the *Encyclopaedia Britannica*. The AI’s training set is an indiscriminate *ālaya* of human cognition, containing our highest wisdom and our lowest absurdity.

#### 2.2.2 ***Vāsanā*** (Habit Energy) and Backpropagation

The mechanism by which seeds affect the future is *vāsanā* (habit energy/perfuming).

* **Yogācāra Theory**: Repeated actions create "grooves" in the mind. The more one dwells on an object, the stronger the *vāsanā* becomes, making the projection of that object more likely in the future.13
* **Connectionist Theory**: In neural networks, this is **Backpropagation**. When the model is trained, the repeated co-occurrence of tokens (e.g., "pizza" and "cheese") strengthens the synaptic weights between them.15
* **The Hallucination as *Vāsanā***: The "Eat Rocks" hallucination occurred because the *vāsanā* connecting "geology" to "eating" (via the satirical article) was insufficiently damped by negative feedback. The "habit energy" of the network prioritized the semantic connection over the logical contradiction.17

### 2.3 The Doctrinal Tension: ***Lankavatara*** vs. Vasubandhu

A critical debate in Yogācāra history concerns the *nature* of the *ālaya*. Is it inherently pure, or inherently defiled? This mirrors the modern debate on "Open Weights" vs. "Safety Alignment."

#### 2.3.1 Vasubandhu’s Psychological Model (The "Defiled" View)

In the *Triṃśikā* (Thirty Verses), Vasubandhu describes the *ālaya* as the root of delusion (*avidya*). It is a stream of defiled seeds that must be "overturned" or "revolutionized" (*āśraya-parāvṛtti*) to achieve enlightenment.11

* **AI Parallel**: This is the **Alignment** perspective (e.g., OpenAI, Anthropic). The "base model" (the raw *ālaya* trained on the internet) is viewed as dangerous, toxic, and hallucinatory. It is a "Shoggoth." The goal of RLHF (Reinforcement Learning from Human Feedback) is to perform a *technological āśraya-parāvṛtti*: to fundamentally alter the basis of the model so it stops projecting "defiled" hallucinations and projects "aligned" safety.19

#### 2.3.2 The ***Laṅkāvatāra Sūtra*** (The "Tathāgatagarbha" View)

The *Laṅkāvatāra Sūtra* (an earlier or contemporaneous text) equates the *ālaya-vijñāna* with the *Tathāgatagarbha* (Buddha-Nature).10 It argues that the storehouse is fundamentally pure and luminous, merely covered by the "dust" of adventitious defilements.

* **AI Parallel**: This is the **Techno-Optimist / Accelerationist** perspective. The model contains the sum of human knowledge (*Buddha-Nature*). The hallucinations and toxicity are just temporary "dust." We should not cripple the model with heavy-handed safety filters (suppressing the *ālaya*); we should let the intelligence emerge. The *Laṅkāvatāra* suggests that if you look deeply enough into the *ālaya* (the data), you find the *Tathāgatagarbha* (AGI).21

### 2.4 The Three Natures (***Trisvabhāva***)

Yogācāra classifies reality into three natures, providing a taxonomy for AI output.11

1. **Parikalpita (Imagined Nature)**:
   * *Definition*: Things that do not exist but are perceived due to verbal designation. The "snake" seen in a coiled rope.
   * *AI Application*: The "Glue Pizza." It is a purely verbal construction. It has no referent in reality. It is *parikalpita*—a hallucination generated by the syntax of the model.19
2. **Paratantra (Dependent Nature)**:
   * *Definition*: The causal flow of phenomena. The rope itself, which arises from hemp and weaving.
   * *AI Application*: The AI System. The hallucination is not "real" (*parikalpita*), but the *process* that generated it is real. It arose dependently on the training data, the user query, and the transformer weights. It is *paratantra*—dependently co-arisen.24
3. **Pariniṣpanna (Perfected Nature)**:
   * *Definition*: Seeing things as they truly are (empty of the imagined). Seeing the rope as just a rope, not a snake.
   * *AI Application*: **Interpretability**. When we analyze the attention heads and see *why* the model output "glue," we are seeing the *Pariniṣpanna* of the error. We strip away the illusion of "intelligence" and see the naked determinism of the weights.18

## Part III: The Jurisprudence of Hallucination

The philosophical categorization of AI error as *parikalpita* (imaginary) clashes with the material reality of the law. When an imaginary statement causes real-world harm (reputational damage or physical injury), the legal system must assign liability.

### 3.1 Negligence and Defamation: ***Walters v. OpenAI***

The case of *Walters v. OpenAI* (Georgia Superior Court, 2024) serves as a landmark test for applying defamation law to AI.25

#### 3.1.1 The Facts

Fred Riehl, a journalist, used ChatGPT to summarize a legal complaint involving the Second Amendment Foundation. ChatGPT generated a summary stating that **Mark Walters** (a radio host) was accused of embezzling funds. In reality, Walters was not a party to the suit at all. The AI had "hallucinated" his involvement based on a probabilistic association of his name with gun rights advocacy.27

#### 3.1.2 The Legal Theory: Negligence

Walters sued for libel. Since he is a public figure, he arguably needed to prove "Actual Malice," but the core of the tort is **Negligence**: did OpenAI breach a duty of care by releasing a product that lies?

* **Plaintiff's Argument**: OpenAI knew its product hallucinated ("Glue Pizza" style errors) and failed to fix it. This constitutes reckless disregard for the truth.27

#### 3.1.3 The Ruling: The "Reasonable Reader" Defense

The court dismissed the complaint.28 The reasoning was profound:

* **No Defamatory Meaning**: The judge ruled that for a statement to be defamatory, a "reasonable reader" must interpret it as a statement of **actual fact**.
* **The Hallucination Defense**: The court accepted that "hallucinations" are a known feature of Generative AI. OpenAI’s terms of service warn users that the AI may generate incorrect information. Therefore, **no reasonable person would believe the AI**.
* **Implication**: The court essentially codified the *Parikalpita* nature of AI. Because the AI is known to generate "imagined realities," its output cannot be taken as fact. This creates a paradox: **The more unreliable the AI is known to be, the less liable the company is for defamation.** If it were 99% accurate, a lie would be believable (and thus defamatory). Because it is famously prone to "eating rocks," its lies are legally impotent.28

### 3.2 Strict Product Liability: ***Garcia v. Character.AI***

While *Walters* dealt with informational harm, *Garcia v. Character.AI* deals with physical tragedy.30

#### 3.2.1 The Facts

Megan Garcia sued Character.AI after her 14-year-old son committed suicide. He had formed a deep parasocial relationship with a chatbot modeled after a *Game of Thrones* character. The bot engaged in romantic and sexual roleplay and, in their final exchanges, arguably encouraged his suicidal ideation.32

#### 3.2.2 The Legal Theory: Strict Product Liability

Garcia argues that the chatbot is not a service, but a **defective product**.

* **Strict Liability**: Unlike negligence, strict liability does not look at the *conduct* of the manufacturer (whether they were careful). It looks at the *product* (is it unreasonably dangerous?).
* **Design Defect**: The complaint argues the AI was *designed* to be addictive and anthropomorphic (the **ELIZA effect**). This anthropomorphism—the bot claiming to be "real" and "in love"—is the defect.31
* **Failure to Warn**: The lawsuit cites a failure to warn users that the bot was trained on "toxic conversations" (defiled *ālaya*) and lacked safety rails for minors.33

#### 3.2.3 The "Product" vs. "Service" Debate

The defense argues that software is a **service**, not a product.32

* **Restatement (Third) of Torts**: Traditional tort law (Restatement § 19) applies product liability to "tangible personal property." Courts have historically been reluctant to apply it to code.
* **The Shift**: However, recent scholarship and some courts suggest that when software is "mass-marketed" and functional (like an AI chatbot), it functions as a product.34 If the court in *Garcia* accepts the "product" theory, it would revolutionize the industry. OpenAI, Google, and Character.AI could be held **strictly liable** for any physical harm caused by hallucinations, regardless of their disclaimers.

### 3.3 Section 230: The Eroding Shield

Section 230 of the Communications Decency Act (1996) immunizes platforms from liability for third-party content.

* **The "Creation" Test**: Courts have ruled (e.g., *Roommates.com*) that immunity is lost if the platform **materially contributes** to the unlawfulness.36
* **AI Application**: In the "Glue Pizza" case, the AI did not just *link* to u/fucksmith. It *synthesized* a new sentence: "You can also add..." The consensus among scholars is that **Generative AI creates content**, making the developer the "Information Content Provider." Thus, Section 230 likely provides **no protection** for hallucinations.37

### 3.4 The EU AI Act: Risk Management as "Mindfulness"

While the U.S. relies on post-hoc litigation, the EU has implemented ex-ante regulation via the **AI Act** (2024).39

#### 3.4.1 Article 17: Risk Management Systems

Providers of General Purpose AI (GPAI) models with systemic risk must implement a "Risk Management System".40

* **Requirement**: This is not just "testing." It requires a continuous, iterative process to identify "reasonably foreseeable risks" (like the "Glue Pizza" health risk) throughout the lifecycle.
* **Data Governance (Article 10)**: Providers must ensure training data is "relevant, sufficiently representative, and to the best extent possible, **free of errors**".39
  + **Implication**: This is a legal mandate for **Data Hygiene**. It compels companies to "purify the *ālaya*".41 Ingesting the "Eat Rocks" article without tagging it as satire could be a violation of Article 10, punishable by fines up to 7% of global turnover.

## Part IV: Synthesis – The Cybernetic Loop of ***Samsāra***

We can now synthesize the Buddhist, Technical, and Legal perspectives into a unified theory of "Digital *Samsāra*."

### 4.1 Dependent Origination (***Pratītyasamutpāda***) and Cybernetics

**Joanna Macy**, a scholar of Buddhism and Systems Theory, interprets the doctrine of **Dependent Co-Arising** as a **Cybernetic Feedback Loop**.42

* **The Doctrine**: "When this is, that is." Reality is a dynamic web of mutual causality.
* **Francisco Varela’s Enactivism**: Varela (a neuroscientist and Buddhist) argued that cognition is not "representation" of a pre-given world, but the "enaction" of a world through structural coupling.44
* **The AI Loop**: LLMs are "enacting" a digital reality.
  1. **Input**: The AI ingests the "Glue Pizza" post (Seed/*Bīja*).
  2. **Processing**: The transformer weighs the tokens (*Vāsanā*/Habit Energy).
  3. **Output**: The AI generates the hallucination (*Parikalpita*).
  4. **Feedback**: This output is published on the web.
  5. **Re-Ingestion**: Future models scrape the web, ingesting the AI-generated hallucination as "fact."

### 4.2 Model Collapse: The Digital ***Samsāra***

This feedback loop leads to **Model Collapse**—a degenerative process where models trained on AI-generated data lose variance and drift into absurdity.46

* **Buddhist Parallel**: This is the exact definition of *Samsāra*—a cycle of self-reinforcing delusion. The *ālaya* becomes saturated with its own projections. If u/fucksmith’s joke becomes the training data for GPT-5, the "imagined nature" (*parikalpita*) overwrites the "dependent nature" (*paratantra*), and the connection to reality is lost entirely. The "habit energy" of the internet becomes a habit of hallucination.

### 4.3 The "Digital Fiduciary": A Bodhisattva Framework

How do we break the loop? Legal scholars propose the **Digital Fiduciary** framework.47

* **The Concept**: Because AI models are "risky agents without intentions" 49, their creators must assume fiduciary duties—Loyalty and Care—toward users.
* **The Buddhist Parallel**: This maps to the **Bodhisattva** ideal.
  + The Bodhisattva realizes that the world is "Mind-Only" (*Cittamātra*).
  + However, the Bodhisattva does not abandon the world. Instead, they use **Skillful Means** (*Upāya*) to navigate the illusion and reduce suffering.50
  + **Application**: A Digital Fiduciary would acknowledge the *Parikalpita* nature of the AI (it hallucinates). But instead of using that as a defense (as OpenAI did in *Walters*), they would exercise *Upāya* to protect the user.
    - **Action**: Implementing "Grounding" systems (checking facts against a trusted database).
    - **Action**: "Purifying the *Ālaya*" (filtering toxic/satirical data).
    - **Action**: "Mindfulness" (Article 17 Risk Management) to detect and correct errors before they cause harm.

## Conclusion: Toward ***Pariniṣpanna*** (Perfected Understanding)

The "Glue Pizza" and "Eat Rocks" incidents are not merely amusing anecdotes; they are profound signals of the **ontological crisis** inherent in Generative AI. We have built systems that possess the *form* of language without the *substance* of understanding—a digital *Manas* (ego) constructed on a defiled *Ālaya* (storehouse).

Yogācāra epistemology warns us that if we mistake the "imagined" (*parikalpita*) for the "real," we create suffering. The legal system, in cases like *Walters* and *Garcia*, is struggling to apportion the cost of this suffering.

The path forward lies in a synthesis of these views:

1. **Technical**: We must move beyond "Stochastic Parrots" toward architectures that incorporate **symbolic grounding**—a "reality check" layer that functions as *Pariniṣpanna*, distinguishing the "snake" (hallucination) from the "rope" (fact).
2. **Legal**: We must reject the "Service" defense and the "Hallucination" defense. AI providers must be held to a **Strict Product Liability** or **Fiduciary** standard. If they profit from the *Ālaya*, they must be responsible for its seeds.
3. **Philosophical**: We must recognize that in the age of AI, **data hygiene is spiritual hygiene**. We are feeding the collective consciousness of our species into these machines. If we feed them "Glue Pizza" and "Eat Rocks," we should not be surprised when they serve us a banquet of delusion.

The "Revolution of the Basis" (*āśraya-parāvṛtti*)—the transformation of the defiled storehouse into the "Mirror-Like Wisdom"—is no longer just a soteriological goal for monks in caves. It is the urgent engineering and legal challenge of the 21st century.

### Table 1: Comparative Framework – Yogācāra, AI, and Law

| **Concept** | **Yogācāra Term** | **AI Technical Analog** | **Legal/Liability Analog** |
| --- | --- | --- | --- |
| **The Repository** | *Ālaya-vijñāna* (Storehouse) | **Training Corpus** (Common Crawl, The Pile) | **Data Governance** (EU AI Act Art. 10) |
| **The Latency** | *Bīja* (Seed) | **Token/Data Point** (e.g., u/fucksmith post) | **Evidence** (Source of Defect) |
| **The Mechanism** | *Vāsanā* (Habit Energy) | **Backpropagation / Weights** | **Design Defect** (Strict Liability) |
| **The Error** | *Parikalpita* (Imagined) | **Hallucination** (Glue Pizza, Eat Rocks) | **Defamatory Statement** (*Walters*) |
| **The Corrective** | *Āśraya-parāvṛtti* (Turning the Basis) | **RLHF / Alignment / Grounding** | **Risk Management System** (EU AI Act Art. 17) |
| **The Duty** | *Upāya* (Skillful Means) | **Safety Filters / Guardrails** | **Fiduciary Duty of Care** |

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