



Tech Oversight

CALIFORNIA

August 31, 2026

Re: SB 1119 (Padilla) Companion chatbots: children's safety (Adam's Law) – SUPPORT

Dear Senator Padilla and Assemblymembers Wicks and Bauer-Kahan:

On behalf of Tech Oversight California, I write in support of SB 1119, Adam's Law, which will dramatically strengthen California's youth chatbot protections for our kids. We appreciate your incorporation of feedback that addresses concerns we had raised during the development of last year's SB 243. We also wish to note several outstanding concerns we hope can be similarly addressed next year.

TOC is an advocacy organization that champions meaningful tech accountability reforms to address Big Tech's toxic business model and provide powerful online protections for Californians. Legislators in California have spent half a decade now building a design-based approach to protecting kids online, an approach that has our strong support. This year we also co-sponsored AB 2246 to strengthen California's first-in-the-nation Age-Appropriate Design Code and supported AB 1709 targeting addictive feature design. SB 1119 extends that design-focused, data-minimizing approach to this fast-emerging product category – exactly the right approach.

Proof couldn't be more conclusive that young people need better protections by design. Last week, Attorney General Bonta and a coalition of 50 states and territories reached a historic settlement with Meta that will finally force changes to its product design we have advocated for years. That settlement followed the first monetary jury verdicts in American history against social media companies for harming young users. In March, a New Mexico jury found Meta liable for misleading parents about the safety of its platforms and ordered the maximum penalty under state law, \$375 million. That same month, a Los Angeles jury found that Meta's and YouTube's negligence was a substantial factor in a young plaintiff's mental health harm. In August, a New Mexico judge went further, adding a \$567 million abatement fund and ordering Meta to limit how much time underage users spend on Facebook and Instagram, hide like counts on their posts by default, and warn those users of the risks.

These verdicts confirm what parents and advocates have known for years: the harms are rooted in product design, and design-centered solutions are exactly the right response. SB 1119 embraces that approach by creating strong default protections for our kids, including prohibitions on chatbots encouraging harm, self-harm, or suicidal ideation; persistent conversational memory turned off by default; data minimization and use limitations on personal information collected about kids; and default time limits of one hour per chat and two hours across all chats per day.

Our remaining concerns go to the heart of our mission to hold tech companies accountable. First, the audit requirement only applies to companies over \$500 million in revenue – that covers OpenAI and Google but exempts companies like Character.AI, Replika, and Nomi. Secondly, the audit is close to self-certification now: the company writes its own summary, attests to it not under penalty of perjury, and posts a high-level version. The Attorney General's office has to show cause to see the real report, and the company can redact it. We hope to work with you to strengthen these provisions next year.

We have been honored to work alongside families affected by these harms to amplify their stories and seek the design-centered reforms that these cases prove are necessary. We would especially like to recognize the tireless advocacy of the Raine family and commend you for working closely with them and for naming this bill in Adam's honor. We applaud your continued leadership in this space and look forward to working with you to ensure California leads the country in protecting our kids from the risks and harms of interacting with A.I. chatbots.

Respectfully,

Sacha Haworth
Executive Director
Tech Oversight California