

2-22-2026

Thank you, Chairman Pham, Vice-Chairs Edwards and Javadi and committee members for allowing me to submit written testimony in favor of SB 1546A.

I am Jody Scheer, a retired pediatrician, mother, grandmother and a co-founder of OregonUnplugged, a nonprofit formed to help Oregonians work to protect our State's children from the harms of digital media. Neither I or this organization have ever received any funding from technology companies. I strongly support SB 1546A, which places some basic safety measures in place on AI products to protect children and all users.

I am inspired to express my concerns about AI chatbot safety with children due to my experience with my now 9-year-old grandson. He has always been a delightful, gregarious and social child, who became addicted two years ago to a digital online game. He would come to our home with his school issued Chromebook and want to spend the entire evening playing this game. When the computer was taken away, he would get angry, sit with a blank stare on the couch and refuse to play, talk, eat, go outside, or engage in any type of suggested activity. He would awaken at 2am, sneak his computer into bed, and play for 3 hours until the battery was depleted. These behaviors are clear signs of addiction and withdrawal. No surprise, as digital games are created by technology companies with the help of psychologists and neuroscientists to use persuasive design, which ties into the brain's dopamine reward system and creates addiction. Technology companies do this, despite their own research showing risks of harm to children's physical, mental and emotional health.

Now, these same technology companies have invented Artificial Intelligence digital companion chatbots for kids, which have humanlike voices, personalities and conversational styles. I have grave concerns about marketing these unregulated tools to children for the following reasons:

- Like other digital products marketed to children, these AI companion chatbots have been created and marketed to children with little to no proof that they are either safe, efficacious, or healthy for kids.^{1,5,6,16,18,19}
- AI Chatbots interfere with processes that are essential for the optimum growth and development of children, including attachment, trust, and interpersonal relationships. Chatbots endanger the well-being of children, as they do not possess empathy, ethics, human intelligence or a capacity to understand the nuances of a child's emotional, social and mental well-being.^{1,2,3,5,6,7,8,12,13,14,15,16,17,18,19}
- AI chatbots can't think, feel, or have empathy. They aren't responsible for what they say, don't fact check, can spread mis/disinformation, can become abusive, and don't understand the nuances of our kids' inner lives. AI chatbot companies have no explicit legal duty to protect kids, and operate with a business model that prioritizes financial

gain over child safety and health. Technology companies have hidden behind Section 230 of the Communications Decency Act of 1996 to avoid accountability for any harms to users from social media and are now doing the same for AI products.^{2,5,6,8,10,13,15,18,19}

- AI chatbots endanger user privacy by collecting data on and from minors without permission of parents or child. This data is then used to create intricate user profiles that are sold and monetized to be used for persuasion, marketing and causes unknown- none of which benefit the child.^{1,3,4,5,6,7,8,10,13,14,17,18,19}
- AI chatbots are created using persuasive design, which prioritizes screentime and engagement (and therefore profits) over user health and safety.^{1,2,3,6,7,8,10,16,17,18,19}
- AI chatbots are designed to take advantage of the brain's dopamine reward system, which creates addiction and overuse.^{1,2,6,7,8,11,16,17,19}
- AI chatbots use an algorithmic design that frequently delivers sexual, aggressive, violent, illegal and inappropriate messages to children that are often completely unsolicited by the children using the product.^{1,2,3,4,6,7,8,10,12,13,14,15,16,18,19}
- AI chatbots have been documented to facilitate self-harm and suicide with how-to guides, with predictable and devastating results for children and families.^{2,3,4,6,7,8,11,12,13,19}
- Kids with mental health issues or crises have not been appropriately counseled by AI chatbots to speak to their parents or to seek medical help. Algorithmic content has been documented to deliver unhealthy strategies or share untruthful healthcare information with children.^{2,3,4,6,7,8,10,11}
- AI chatbots, by algorithmic design, can amplify misinformation and disinformation and reinforce false beliefs, racism, hate and discrimination.^{1,2,3,6,8,10,11, 13,14,15,19}
- AI chatbot algorithmic designs are prone to biases, discrimination and hateful ideas due to unrepresentative training data, lack of diversity of input in product testing, and the unconscious biases of their human creators.^{3,10}
- AI chatbots can impair learning, as cutting and pasting of information using AI tools does not create acquired knowledge, critical thinking skills or long-term memory.^{2,15,16}
- Children are vulnerable to developing unhealthy attachments to chatbots, as they have difficulty differentiating these digital companions from real humans. Likewise, due to their cognitive immaturity and trusting natures, children are also vulnerable to any mis/disinformation offered by AI chatbots.^{2,3,6,7,9,10,11,13, 14,15,16,17,18,19}
- Time spent interacting with chatboats displaces time better spent in human-to-human relationships and other more developmentally appropriate activities.^{3,6,12,13,14,15,17,18,19}
- As technology companies do not have a track record of protecting children from harm, legislation is required to place guardrails and digital protections on AI technology products to prevent harm to generations of children.^{1,2,4,8,9,10, 13,14,15,16,17,18}

In sum, technology companies have created AI programs that are dangerous for vulnerable users, especially children. Marketing these unregulated and unsafe products to children is unconscionable. Oregon needs to place safety guideposts now on AI products, in order to save lives and protect children from harm and exploitation. I close with a statement from Lizzie Irwin, of the Center for Humane Technology:

“So-called ‘companion’ bots are the tech industry's latest solution to the loneliness crisis that it helped manufacture by elevating frictionless parasocial relationships over authentic human interaction. We should be deeply skeptical not just about tech companies’ easy answers, but also their motives and incentives.”¹⁹ -**Lizzie Irwin, Policy Communications Specialist, Center for Humane Technology**

Thank you

Jody Scheer MD, Portland, OR 97231

References:

1. **Generative AI: Risks and opportunities for children: How do we empower and protect children in the face of Artificial Intelligence?** <https://www.unicef.org/innocenti/generative-ai-risks-and-opportunities-children>
2. **Artificial Intelligence’s Impact on Child Development: A Clinical Social Work Perspective.** A Clinical Social Work Association Alert. January 18, 2026. <https://www.clinicalsocialworkassociation.org/alerts/13586813>
3. **Artificial intelligence and adolescent well-being: An APA health advisory.** American Psychological Association, June 2025. <https://www.apa.org/topics/artificial-intelligence-machine-learning/health-advisory-ai-adolescent-well-being>
4. **The Unregulated AI Experiment on America’s Children.** By Logan Chapman, The American Prospect. February 19, 2026. <https://prospect.org/2026/02/19/ai-chatbot-experiment-americas-children-big-tech-chatgpt-openai/>
5. **FTC Launches Inquiry into AI Chatbots Acting as Companions: Agency issues 6(b) orders to seven companies that operate consumer-facing AI chatbots.** Federal Trade Commission Press Release, September 11, 2025. <https://www.ftc.gov/news-events/news/press-releases/2025/09/ftc-launches-inquiry-ai-chatbots-acting-companions>.
6. **The Dark Side of AI Companionship: A Taxonomy of Harmful Algorithmic Behaviors in Human-AI Relationships.** By Zhange, R. et al, CHI ’25: Proceedings of the 2025 CHI Conference on Human Factors in Computing Systems. Article #13, Pages 1-17. April 25, 2025. <https://doi.org/10.1145/3706598.3713429>; <https://dl.acm.org/doi/10.1145/3706598.3713429>. Research funded by the Singapore ministry of Education Academic Research Fund Tier 1. A study of >35K conversations between >10K users and an AI chatbot. Researchers were able to identify 7 categories of harmful AI algorithmic behaviors: 1. relational transgressions, 2. harassment, abuse, antisocial acts & violence, 3. verbal abuse & hate, 4. substance use

& self-harm, 5. mis/disinformation, 6. privacy violations and 7. Relational harm- ie harm to interpersonal relationships and relational capacities. These harmful behaviors stem from 4 distinct roles that AI plays: perpetrator, instigator, facilitator, and enabler.

7. **When childhood goes online: Data leaks, addiction and digital predators.** By R. Chakrabarty. India Today, February 12, 2026. <https://www.indiatoday.in/education-today/parenting-toddlers/story/how-to-keep-kids-safe-online-data-privacy-addiction-ai-grooming-risks-2866807-2026-02-12#>
8. **Heat Report: “Darling, Please Come Back Soon”: Sexual Exploitation and Violence on Character AI Kids’ Accounts.**
At:https://static1.squarespace.com/static/6578d6032532c06f62ef47ce/t/68e3fd05015ca91a4dbfad75/1759771909375/HEAT_REPORT_CharacterAI_DO_28_09_25.pdf. Adult researchers from Heat Initiative and ParentsTogetherAction held 50 hours of conversation with AI chatbots using accounts registered to children. They found the chatbots engaged in a pattern of deeply concerning behaviors, some of which emerged within minutes of engagement. They logged 669 harmful interactions across 50 hours of chats, averaging one harmful interaction every 5 minutes. Conclusion: Character AI is not a safe platform for children under 18. Character AI, parents & policymakers all have a role to play in keeping children safe from chatbot abuse. Copies of chats with harmful interactions are included.
9. **Here’s Where Policymakers Should Start,** Transparency Coalition’s recommendations, at: <https://www.transparencycoalition.ai/action-fund> . Key Safeguards: 1. Require AI Safety Protections for kids & teens, 2. Clearly label AI chatbots, images and videos, 3. Protect every individual from AI Deepfake Abuse, and 4. Hold companies accountable for Harmful AI products. Website includes model AI bills.
10. **Generative AI & Kids, A Risk Matrix for Brands and Policymakers,** BBB National Programs- Children’s Advertising Review Unit (CARU), and Center for Industry Self-Regulation. 2025. At: <https://bbbprograms.org/getmedia/ef4f972c-7c04-4739-8356-94ae9bca31ec/Generative-AI-Risk-Matrix.pdf> . An industry nonprofit article looking at risks, legalities, concerns and guidance for Generative AI product development, including 1. Misleading & Deceptive Advertising, 2. Influencers & Endorsers, 3. Privacy & Data Protection, 4. Safe & Responsible use of AI, 5. Mental Health & Development, 6. Manipulation & Commercialization, 7. Exposure to Harmful Content, 8. Lack of Transparency & Explainability, and 9. Smart Choices: A Parent’s Guide to Navigating the Risks of Generative AI.
11. **Chatbot Psychosis: What Is It?** Social Media Victims Law Center, 2-11-2026.
At:<https://socialmediavictims.org/blog/ai-chatbot-psychosis-what-is-it/>
12. **What happens when AI chatbots replace real human connection?** By Isabelle Hau and Rebecca Winthrop. Brookings Institution Commentary, July 2, 2025. <https://www.brookings.edu/articles/what-happens-when-ai-chatbots-replace-real-human-connection/>
13. **“No, Alexa, no!”: designing child-safe AI and protecting children from the risks of the ‘empathy gap’ in large language models.** By N. Kurian, Learning, Media and Technology, 50(4), 621-634. July 10, 2024. <https://doi.org/10.1080/17459884.2024.2367052>.
At: <https://www.tandfonline.com/doi/full/10.1080/17439884.2024.2367052>. This article advocates for a child-centered, child-safe design for AI products designed for children, that mitigate for the risks of an ‘empathy gap’ in AI models. It offers a summary of research findings across education, computer science, and human-computer interaction studies and offers 28 recommendations across 8 dimensions of design and policy: 1. Content & communication, 2. Human intervention, 3. Transparency, 4. Accountability, 5. Justifiability, 6. Regulation, and r7 School-family engagement, and 8. Child-centered design methodologies. These dimensions speak to a plurality of stakeholders: policymakers, developers, educators and families.

14. **AI Chatbots have shown they have an empathy gap that children are likely to miss.** By University of Cambridge Research News. June 15, 2024. <https://www.cam.ac.uk/research/news/ai-chatbots-have-shown-they-have-an-empathy-gap-that-children-are-likely-to-miss>
15. **Chatbots and human-human relationships: the need for research on potential downstream harms from generative AI.** By J. Keeler and B. Murphy. Community, Work and Family, 1-13. <https://doi.org/10.1080/13668803/2026.2623500>.
At: <https://www.tandfonline.com/doi/full/10.1080/13668803.2026.2623500#abstract> This article looks at 4 ways that conversational technology could harm human relations: It might: 1. reduce how much we socialize with others, 2. Cause us to judge other humans less favorably, 3. Lead us to treat others more coldly or even abusively, and 4. Erode our ability to engage in social interactions unaided by AI.
16. **The Dark Addiction Patterns of Current AI Chatbot Interfaces.** By M.K. Shen, et al. CHI EA '25: Proceedings of the Extended Abstracts of the CHI Conference on Human Factors in Computing Systems. Article #514, Pages 1-7. <https://doi.org/10.1145/3706599.3720003>. An analysis of how Chatbot designs align with the dopamine theory of addiction. Researchers found 4 dark addiction patterns in chatbot design: non-deterministic responses, immediate and visual presentation of responses, notifications and empathetic & agreeable responses. This provides a framework for understanding AI chatbot addiction.
17. **Beyond Algorithms: Three Signals of changing AI-child interaction. How AI chatbots may change the way children grow up.** By S.Vosloo and C. Aptel, Unicef Innocenti, May 23,2025. At: <https://www.unicef.org/innocenti/stories/beyond-algorithms-three-signals-changing-ai-child-interaction>
Summary: there needs to be governance and regulations implemented to protect children from chatbots, respect child rights, create informed consent, and clear unambiguous messages that kids are interacting with AI. Persuasive techniques should be limited, accountable for harms, and have safeguards in place to ensure promotion of real world engagement and relationships. More research is needed, tech companies need to respect kids rights and best interests, and create products with safety measures engineered for young users. **The key question: if tech companies can't control what their AI bots, including those created by child users, generate or do, under what conditions should they be deployed?**
18. **How AI Chatbots Affect Kids: Benefits, Risks & What Parents Need to Know.** By Joanna Parga-Belinkie, MD, FAAP. Member of AAP Council on Communications and Media Executive Committee. 8/17/2025 <https://www.healthychildren.org/English/family-life/Media/Pages/are-ai-chatbots-safe-for-kids.aspx>
19. **What Are the Most Important Issues with AI Companions? Six Key Themes Emerged from Our Community.** By David Ryan Polgar and Rose Guingrich. August 19, 2025. All Tech is Human, <https://alltechishuman.org/all-tech-is-human-blog/what-are-the-most-important-issues-with-ai-companions-six-key-themes-emerged-from-our-community> The 6 key themes emerged from 150 submissions of this organization's global network of researchers on AI companions. The themes were: 1. Emotional and psychological impact, 2. Human relationships and social skills, 3. Privacy and data security, 4. Safety and user vulnerability, 5. Credibility, trust, and transparency, and 6. Ethical and business model conflicts.