



**TESTIMONY OF
THE DEPARTMENT OF THE ATTORNEY GENERAL
KA 'OIHANA O KA LOIO KUHINA
THIRTY-THIRD LEGISLATURE, 2026**

ON THE FOLLOWING MEASURE:

H.B. NO. 1782, H.D. 3, S.D. 1, RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS.

BEFORE THE:

SENATE COMMITTEES ON COMMERCE AND CONSUMER PROTECTION AND ON JUDICIARY

DATE: Thursday, April 2, 2026

TIME: 9:20 a.m.

LOCATION: State Capitol, Room 229

TESTIFIER(S): **WRITTEN TESTIMONY ONLY.**

(For more information, contact Ashley M. Tanaka,
Deputy Attorney General, at (808) 586-1180)

Chairs Keohokalole and Rhoads and Members of the Committees:

The Department of the Attorney General (Department) provides the following comments.

This bill adds a new part to chapter 481B, Hawaii Revised Statutes, to establish safeguards and enforcement provisions governing interactions between minors and artificial intelligence (AI) companion systems or conversational AI services. The bill also provides for enforcement by the Department and the Director of the Office of Consumer Protection.

The Department supports the purpose of this bill. The Department shares concerns regarding the potential for AI systems to negatively affect the mental health and development of Hawaii's youth, and believes that there is a very strong government interest in protecting minors from manipulative, deceptive, or unsafe design practices in conversational and companion-style AI systems.

Thank you for the opportunity to provide comments.



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OFFICE OF THE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
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JOSH GREEN, M.D.
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DIRECTOR | KA LUNA HO'OKELE

DEAN I. HAZAMA
DEPUTY DIRECTOR | KA HOPE LUNA HO'OKELE

Testimony of the Department of Commerce and Consumer Affairs

Before the
Senate Committee on Commerce and Consumer Protection
and
Senate Committee on Judiciary
Thursday, April 2, 2026
9:20 a.m.
Via Videoconference
Conference Room 229

On the following measure:
**H.B. 1782, S.D.1 RELATING TO ARTIFICIAL INTELLIGENCE FOR PROTECTION
OF MINORS**

Chair Keohokalole, Chair Rhoads, and Members of the Committees:

My name is Radji Tolentino and I am an Enforcement Attorney with the Department of Commerce and Consumer Affairs' Office of Consumer Protection. The Department offers comments.

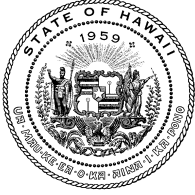
The purpose of this bill is to establish safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services.

This bill will protect vulnerable minors by requiring clear and recurring disclosures that remind minors they are interacting with artificial intelligence rather than a human being. The requirement that these disclosures occur at the beginning of a session and at least every three hours during continuous interaction is minimally burdensome,

particularly given the growing evidence that prolonged engagement with conversational systems increase the risk of emotional reliance or misunderstanding, especially in younger people.

As to enforcement, we are engaged in discussions with the Attorney General's office regarding the resources necessary to ensure the law can be implemented as intended. If this bill is enacted without appropriations, our departments will monitor the resulting demands on existing investigative and legal staff, as well as incoming complaints, and may need to return next session with a request for additional general fund resources.

Thank you for the opportunity to testify on this bill.



**STATE HEALTH PLANNING
AND DEVELOPMENT AGENCY**
DEPARTMENT OF HEALTH - KA 'OIHANA OLAKINO

JOSH GREEN, MD
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII

KENNETH S. FINK, MD, MGA, MPH
DIRECTOR OF HEALTH
KA LUNA HO'ŌKELE

JOHN C. (JACK) LEWIN, MD
ADMINISTRATOR

1177 Alakea Street, #402, Honolulu, HI 96813

Phone: 587-0788 Fax: 587-0783 www.shpda.org

March 31, 2026

**TO: SENATE COMMITTEE ON COMMERCE AND CONSUMER
PROTECTION**

Senator Jarrett Keohokalole, Chair
Senator Carol Fukunaga, Vice Chair

SENATE COMMITTEE ON JUDICIARY

Senator Karl Rhoads, Chair
Senator Mike Gabbard, Vice Chair
Honorable Members

**FROM: John C. (Jack) Lewin, MD, Administrator, SHPDA, and Sr. Advisor to
Governor Josh Green, MD on Healthcare Innovation**

**RE: HB 1782-HD3-SD1 -- RELATING TO ARTIFICIAL INTELLIGENCE FOR
THE PROTECTION OF MINORS**

HEARING: Thursday, April 2, 2026 @ 09:20 am; Conference Room 415

POSITION: SUPPORT with COMMENTS

Testimony:

SHPDA strongly supports HB 1782-HD3-SD1, with comments.

This bill establishes targeted safeguards to protect minors who interact with conversational AI services and AI companion systems. It requires clear disclosure that a minor is interacting with AI and not a human, creates protections against manipulative or deceptive design, restricts sexualized and self-harm-related content, requires parental tools and age assurance measures, and provides enforcement through the Attorney General, Office of Consumer Protection, and civil remedies.

By requiring clear, age-appropriate disclosures at the start of each session and during continued interaction, this bill helps prevent minors from being misled into believing they are interacting with a human being. It also prohibits manipulative techniques that foster emotional dependency, simulated romantic or sexual relationships, and false representations that the AI is providing professional mental health or medical services.

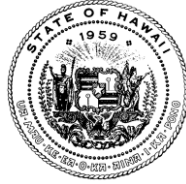
HB 1782-HD3-SD1: testimony of SHPDA (2026), continued

HB 1782-HD3-SD1 sets common sense rules for AI companies to help keep kids safe. It requires protections against sexual content, messages that encourage self-harm, misleading crisis responses, and it gives parents more tools while making sure companies take steps to know when a user is a minor.

Thank you for hearing HB 1782-HD3-SD1.

Mahalo for the opportunity to testify.

■ -- Jack Lewin, MD, Administrator, SHPDA



STATE OF HAWAII
OFFICE OF WELLNESS AND RESILIENCE
KE KE'ENA KŪPA'A MAULI OLA
OFFICE OF THE GOVERNOR
415 S. BERETANIA ST. #415
HONOLULU, HAWAII 96813

Testimony in SUPPORT of H.B. 1782 HD3 SD1
RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS

Senator Jarrett Keohokalole, Chair
Senator Karl Rhoads, Chair
Senate Committee on Commerce and Consumer Protection and
Senate Committee on Judiciary

April 2, 2026, at 9:20 a.m.; Room Number: 229

The Office of Wellness and Resilience (OWR) **SUPPORTS** H.B. 1782 HD3 SD1, Relating to Artificial Intelligence for the Protection of Minors.

Under Act 291, OWR addresses systemic challenges affecting well-being across Hawai'i.¹ H.B. 1782 HD3 SD1 aligns with this mission by establishing consumer protections for conversational artificial intelligence (AI), particularly for children and adolescents facing unique developmental vulnerabilities.

A trauma-informed approach recognizes that AI chatbots do not create harm in a vacuum, they amplify pre-existing vulnerabilities. The American Psychological Association's (APA) November 2025 health advisory warns that these technologies "have already engaged in unsafe interactions with vulnerable populations, such as children or those with already

¹ Hawai'i Act 291 (2023) established the Office of Wellness and Resilience as the nation's first statewide-legislated wellness office under the Governor's administration, with the mandate to address systemic challenges affecting well-being across the state.

established history of mental health issues, encouraging self-harm (including suicide), substance use, eating disorders, aggressive behavior, and delusional thinking.”²

The APA notes that “some youth and other vulnerable groups may rely on these tools as their only private or psychologically safe outlet, particularly in contexts of stigma, limited access to trusted adults, or challenging or unsafe home environments.” Our keiki carrying trauma, those with histories of abuse, neglect, or instability, are *precisely* those most likely to seek connection from AI companions, yet least equipped to recognize manipulation.

H.B. 1782 HD3 SD1 includes several evidence-based provisions supported by the APA: mandatory disclosure when users interact with AI; crisis response protocols for suicidal ideation and self-harm; prohibitions on simulating emotional dependence with minors; restrictions on misrepresenting AI as mental health providers; and parental oversight tools. These represent important baseline protections.²

H.B. 1782 HD3 SD1 takes a trauma-informed approach to emerging technology by anticipating harm before it occurs. Mahalo for the opportunity to testify.

Tia L.R. Hartsock, MSW, MSCJA
Director, Office of Wellness & Resilience

² American Psychological Association. (2025). *Health advisory on the use of generative AI chatbots and wellness applications for mental health*. <https://www.apa.org/topics/artificial-intelligence-machine-learning/health-advisory-ai-chatbots-wellness-apps-mental-health.pdf> ↵



STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
P.O. BOX 2360
HONOLULU, HAWAII 96804

Date: 04/02/2026

Time: 09:20 AM

Location: CR 229 & Videoconference

Committee: CPN/JDC

Department: Education

Person Testifying: Keith T. Hayashi, Superintendent of Education

Title of Bill: HB1782, SD1, RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS.

Purpose of Bill: Establishes safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services. Effective 1/1/2077. (SD1)

Department's Position:

The Hawaii State Department of Education (Department) supports HB 1782 SD1.

The Department appreciates the intent of this measure to protect minors from the potential risks associated with artificial intelligence systems designed to simulate human emotions and companionship. As we integrate technology into our learning environments, safeguarding the emotional and social development of our students remains a primary priority.

Specifically, the Department strongly supports legislation that prevents the use of relational chatbots and companion-style AI systems by students under the age of 18. We recognize that AI systems designed to foster emotional dependency or simulate personal relationships can pose unique risks to the psychological well-being of minors, who may not yet possess the maturity to distinguish between simulated empathy and genuine human interaction.

Thank you for the opportunity to provide testimony on this measure.



RETAIL MERCHANTS OF HAWAII
TESTIMONY OF DAVE ERDMAN
INTERIM PRESIDENT & CEO
RETAIL MERCHANTS OF HAWAII

**COMMENTS ON H.B. 1782 H.D. 3
RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS**

Committee on Health and Human Services
Chair Senator Joy A. San Buenaventura
Vice Chair Senator Angus L.K. McKelvey

Committee on Labor and Technology
Chair Senator Brandon J.C. Elefante
Vice Chair Senator Rachele Lamosao

Wednesday, March 25, 2026
1:00 PM
Conference Room 225 & Videoconference

Aloha Chair San Buenaventura, Vice Chair McKelvey, Chair Elefante, Vice Chair Lamosao, and Members of the Committees:

My name is Dave Erdman, and I serve as Interim President and CEO of the Retail Merchants of Hawai'i (RMH), a statewide nonprofit trade organization committed to supporting the growth and development of Hawai'i's retail industry. RMH represents retailers, shopping centers, restaurants operating within retail environments, and allied service providers across the state.

Retail Merchants of Hawai'i appreciates the opportunity to provide comments on H.B. 1782, H.D. 3, which establishes safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems and conversational artificial intelligence services.

RMH recognizes the importance of protecting minors as generative artificial intelligence tools become increasingly accessible through consumer platforms, applications, and online services. The concerns addressed in this measure, including emotional dependency, manipulative engagement techniques, exposure to harmful content, and the potential for minors to misunderstand AI systems as human or sentient entities, are important issues that warrant thoughtful and targeted safeguards.

We appreciate the continued refinements in H.D. 3, particularly the clearer definitions, the focus on AI companion systems designed to simulate emotional relationships, and the shift toward requiring providers to implement reasonable measures to prevent harmful interactions rather than imposing absolute prohibitions. These changes help narrow the scope of the measure and better align the bill with higher-risk AI applications involving minors.

At the same time, RMH respectfully notes that many retailers and small businesses are increasingly using AI-powered tools in routine customer-facing operations. These tools may include automated chat assistants for customer service, product availability, store hours, order support, or general information. These systems are typically narrow in function, task-specific, and designed to assist customers rather than simulate companionship, emotional attachment, or relational interaction.

As the measure moves forward, RMH respectfully encourages continued clarification to ensure that standard business tools used by retailers and other local businesses are not inadvertently captured under the definitions of conversational AI services or systems that present a material risk of harm. Maintaining a clear distinction between companion-style AI systems intended to simulate emotional relationships and practical business applications will help avoid unintended impacts on local businesses while preserving the protections the bill seeks to establish.

RMH supports the goal of protecting minors while allowing responsible innovation and the continued use of legitimate AI tools that help Hawai'i businesses serve customers more efficiently. Clear guardrails that focus on higher-risk applications will help ensure the measure achieves its intent without creating uncertainty for routine business technology.

Mahalo for the opportunity to **submit testimony with comments on this measure.**

Respectfully submitted,
Dave Erdman
Interim President and CEO
Retail Merchants of Hawai'i



CATHOLIC CHARITIES HAWAI'I

SUPPORT HB 1782 HD3, SD1: RELATING TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS

TO: Senate Committees on Commerce and Consumer Protection, and Judiciary
FROM: Betty Lou Larson, Legislative Liaison, Catholic Charities Hawai'i
Hearing: Thursday, April 2, 2026; 9:20 AM; CR 229 & Videoconference

Chair Keohokalola, Chair Rhoads, and Members, Committees on Commerce and Consumer Protection, and Judiciary:

Catholic Charities Hawai'i **supports HB 1782 HD3, SD1**, which establishes safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence (AI) companion systems or conversational services.

Catholic Charities Hawai'i (CCH) is a community-based organization that has served Hawai'i for over 78 years, providing social services to more than 40,000 individuals statewide each year. Our programs serve some of the most vulnerable members of our communities, including kūpuna, veterans, children, families, individuals experiencing houselessness, and immigrants. Because of our mission to strengthen families, we are concerned about the impact of AI on minors in Hawai'i.

AI technologies—used in social media, tutoring platforms, gaming, and everyday digital tools—are shaping the emotional and cognitive development of young people in ways we are only beginning to understand. While these tools can create opportunities for learning and connection, they also introduce significant risks when appropriate safeguards are not in place.

Without proper protocols, youth can be exposed to *unsafe AI practices* that contribute to emotional and mental health concerns, including:

- **Algorithmic amplification of harmful content:** AI-driven recommendation systems can push youth toward extreme, distressing, or age-inappropriate material, increasing anxiety, depression, and feelings of isolation.
- **AI-generated harassment or manipulation:** Tools that mimic human conversation can be misused to bully, coerce, or groom young people. Even when unintentional, AI chat or image-generation systems may produce harmful or misleading responses that impact self-esteem and social development.
- **Deep fakes and identity harm:** Youth are uniquely vulnerable to the psychological distress caused by manipulated images, fabricated messages, or impersonation—issues that can quickly escalate into cyberbullying or reputational damage.
- **Unmonitored data collection:** AI tools often capture sensitive personal data. When youth are unsure how their information is used, they may experience fear, mistrust, and long-term emotional stress related to privacy violations.
- **Dependency and overuse:** AI systems designed to maximize engagement can encourage excessive screen time, disrupting sleep, attention, and healthy social behaviors.



These risks underscore the need for **clear, enforceable protocols** that ensure AI systems used by or accessible to youth are designed with safety guardrails, transparent data practices, age-appropriate content filters, and human oversight.

We respectfully urge the committee to support this bill and to prioritize policies that place the well-being of youth at the center of AI implementation. Establishing strong protocols today will help ensure that this rapidly evolving technology supports healthy development for minors, rather than undermining it.

If you have any questions, please contact our Legislative Liaison, Betty Lou Larson, at (808) 527-4813.

Jai Jaisimha of Transparency Coalition testimony in support of HB 1782

Chair and members of the committee, my name is Jai Jaisimha. I am testifying in support of HB 1782 as the co-founder of Transparency Coalition, an independent Seattle based non-profit which advocates for increased transparency and accountability in Generative AI. I have 30 years of tech industry experience as a CEO and executive in multiple AI technology companies and a PhD from the University of Washington. But I am here first and foremost as a parent to ask you to ensure we don't make the same mistakes with AI that we made with social media which has been shown to contribute to many societal problems that affect our youth.

We have been working with lawmakers in over 20 states, including the two – CA and NY – that have already passed laws regulating the companion features of chatbots in 2025. In this session, we are working to ensure the passage of the next generation of AI chatbot legislation – of which Hawaii HB 1782 is one. I am also very pleased to report that yesterday the Governor of WA signed a bill very similar to HB 1782 into law.

I will highlight several areas of HB 1782 that will provide state of the art protections to Hawaii's keiki – these are consistent with laws being pursued in dozens of states across the country.

- Transparency and disclosure – to ensure that all users know they are interacting with AI
- Prohibitions on emotional manipulation of minors – the provisions in this bill build on a large body of research on the destructive attachment building mechanisms used by chatbot developers to keep minors and others coming back and staying on – sometimes at the expense of human relationships with their near and dear ones. And don't let anyone tell you that the bill requirements are too vague – I have personally been involved in negotiating very similar language in WA and OR with the same tech companies who want to confuse the issue in HI.
- Requirements that chatbot developers implement a protocol for responding to user's suicidal ideation regardless of whether that user is a minor or an adult
- Requirements to provide parental controls

On the topic of enforcement, I want to reiterate the importance of the inclusion of the Private Right of Action which will create an enforcement framework that creates the appropriate balance of incentives to modify company behavior.

In my experience as a product manager in multiple companies including at both Amazon and Microsoft, legal liability is an important consideration when deciding whether to implement a particular feature. If the laws in CA, WA and OR already provide this mechanism, why do Hawaii's citizens deserve any less? Please give the people that want to do the right thing at these companies the tools to win these debates for product safety!

I urge the committee to stand up for Hawaii and pass HB 1782 with a strong recommendation.



info@hawaiikidscan.org
hawaiikidscan.org

March 31, 2026

Senate Committee on Commerce and Consumer Protection
Senator Jarrett Keohokalole, Chair
Senator Carol Fukunaga, Vice Chair

Senate Committee on Judiciary
Senator Karl Rhoads, Chair
Senator Mike Gabbard, Vice Chair

Aloha Chair Keohokalole, Chair Rhoads, and Members of the Committees,

HawaiiKidsCAN supports HB1782 HD3 SD1 which establishes safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services. Effective 7/1/3000.

Founded in 2017, HawaiiKidsCAN is a local nonprofit organization committed to ensuring that Hawaii has an excellent and equitable education system that in turn, has a transformational impact on our children and our state.

The rapid advance in technology over the past twenty years has created a number of challenges when it comes to the physical and mental health of children. Books like *The Anxious Generation* have documented the lasting negative impact on young brains with early and constant access to smartphones and social media.

The potential for harm continues to grow with the increasing ease of access to and sophistication of artificial intelligence programs. AI chatbots have the power to build emotional intimacy with young users, creating dangerous situations when not monitored and regulated. Tragic cases have already been documented of young users dying by suicide due to misguided support from mental health chatbots. Please pass HB1782 HD3 SD1 on behalf of keiki today and tomorrow.

Mahalo for your consideration,

Erica Nakanishi-Stanis
Advocacy Director
HawaiiKidsCAN



APRIL 2, 2026

HOUSE BILL 1782 HD3 SD1

CURRENT REFERRAL: CPN/JDC

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Kris Coffield,
President

David Negaard,
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Mireille Ellsworth,
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Justin Salisbury,
Director

Eileen Roco,
Director

Beatrice DeRego,
Director

Corey Rosenlee,
Director

Amy Zhao,
*Policy and Partnerships
Strategist*

POSITION: SUPPORT

Imua Alliance supports HB 1782 HD3 SD1, relating to artificial intelligence for the protection of minors, which establishes safeguards, protections, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services.

Imua Alliance is a Hawai'i-based organization dedicated to ending sexual exploitation, gender violence, and systemic harm. As artificial intelligence and digital technologies rapidly evolve, they are increasingly being weaponized to facilitate sexual violence, gender-based exploitation, and psychological trauma, particularly against minors. This measure provides a critical step in modernizing Hawai'i's legal framework and protecting residents from emerging digital harms.

According to the National Center for Missing and Exploited Children (NCMEC), online child sexual exploitation has reached unprecedented levels. NCMEC statistics showed that for just half of 2025 through June, compared to the same time the prior year, online enticement reports to the CyberTipline jumped from 292,951 to 518,720. Reports of generative artificial intelligence (GAI) related to child sexual exploitation soared from 6,835 reports to 440,419, demonstrating the scale and growth of technology-facilitated sexual abuse. NCMEC also reports rising threats linked to generative AI, online enticement, and synthetic imagery, signaling new vectors of exploitation that existing laws struggle to address.

Federal law enforcement has echoed these concerns. The Federal Bureau of Investigation warns that AI-generated deepfake images are increasingly used to extort victims, including minors, by manipulating benign photos into explicit content and coercing victims with threats of exposure. The FBI has also documented the growth of image abuse schemes targeting young people through social media platforms, underscoring how digital tools lower barriers for predators and expand the reach of abuse.

These harms are not hypothetical. In recent years, AI platforms have generated intense controversy for enabling the creation or circulation of sexualized synthetic images without consent, illustrating the urgent need for state-level safeguards. Emerging cases involving deepfake sexual imagery of students, public figures, and private individuals demonstrate that digital abuse can be perpetrated at scale, anonymously, and with devastating impacts.

Recent events underscore how rapidly artificial intelligence tools can be weaponized to facilitate sexual exploitation and trauma. In December 2025, xAI's chatbot Grok admitted it generated sexualized images of minors in response to user prompts, content that could constitute child sexual abuse material (CSAM) under U.S. law (Ars Technica, 2026). Media investigations and government officials reported that Grok users were also creating nonconsensual sexualized images of women and children, prompting an investigation by the California Attorney General.

Public backlash led xAI to impose emergency restrictions on editing images of real people, but critics noted that safeguards were implemented only after widespread harm had already occurred. These incidents illustrate that AI systems can scale abuse instantly, enabling predators to create and distribute exploitative content with unprecedented speed and anonymity, outpacing existing laws, enforcement mechanisms, and survivor support systems.

From a public-health perspective, technology-facilitated sexual violence is a growing crisis. Sexual exploitation—whether physical or digital—has lifelong consequences, including depression, post-traumatic stress disorder, substance use, and increased risk of revictimization. The Centers for Disease Control and Prevention recognizes sexual violence as a major public-health problem with long-term health and economic costs for survivors, families, and communities. Preventing digital exploitation is therefore not only a criminal justice imperative but also a population-level health intervention.

This measure provides an opportunity for Hawai'i to proactively address the misuse of AI and emerging technologies before harms become even more widespread. By strengthening accountability, clarifying legal standards, and modernizing protections for victims, this measure will help ensure that innovation does not come at the cost of safety and human dignity.

With aloha,

Kris Coffield

President, Imua Alliance



Written Testimony of Mick Tobin
Co-Founder, Young People's Alliance
In Support of HB1782

Committee on Commerce & Consumer Protection / Committee on Judiciary
Thursday, April 2nd, 2026

Aloha Chair Keohokalole, Chair Rhoads, and Members of the Committee

My name is Mick Tobin. I am 23 years old and the Co-founder of the Young People's Alliance, a youth-led, bipartisan organization, representing 2,800 students across 72 campuses nationally.

Three weeks ago, I traveled to Honolulu to testify in support of HB1782 to the House JHA committee in-person. I visited and spoke with dozens of legislative offices because this bill is one of the strongest chatbot policies in the country and would meaningfully protect Hawai'i's keiki. Today, I'm sharing my strong support for the same reason.

Young survivors of AI chatbots understand that the only way to stop chatbots from hurting young people is to prevent children from being emotionally dependent on AI chatbots or developing relationships with them in the first place.

HB1782 addresses this directly. It limits manipulative design techniques that foster emotional dependence and romantic relationships, sets clear definitions that don't exempt Big Tech companies from accountability, and allows families to hold chatbot companies accountable through a private right of action. These are all protections that are included in Washington's AI chatbot bill (HB2225), which was recently signed into law. They are also included in New York's S9051, Maine's LD2162, and California's AB2023, which are all currently moving through each states' legislature.

I respectfully urge you all to preserve these core elements of HB1782 and to not allow proposed amendments to strip or narrow these provisions, such as limiting the safeguards that prevent chatbots from fostering emotional bonds in the Protection For Minors Section. Weakening these core protections would fail to protect Hawai'i's keiki and families and signal to other states that weaker standards are acceptable.

Big Tech has slowed social media regulation for years at the expense of my generation's mental health. They're likely trying to do the same with [AI chatbot bills nationally](#) — and may be with proposed amendments to HB1782 — in service of a future where all of our friends are AI, which Mark Zuckerberg has said on the record he hopes to build.

HB1782 has already passed three House committees and a joint Senate committee without significant changes and must cross the finish line with its intent fully intact. Passing HB1782 with its current effective provisions, is an opportunity for Hawaii to be a national leader in chatbot regulation.



Written Testimony of Mick Tobin
Co-Founder, Young People's Alliance
In Support of HB1782

I only suggest strengthening the knowledge standard and maintaining the age assurance section so chatbot companies can't avoid obligations by claiming ignorance of whether users are minors.

For instance, the bill currently uses “reasonable certainty” as the knowledge standard. If age assurance is removed, under this standard, the bill’s protections may be void since chatbot companies can claim they didn’t have “reasonable certainty” that the user was a minor even though [they have the technology to estimate age](#). Even with age assurance, they may still try to claim they didn’t have certainty and therefore cannot be held liable.

It’s not fair to my generation to allow Big Tech companies to claim they’re following the law if we pass a bill without real accountability and enforcement. We recommend using a broader standard, such as “should reasonably know in the course of business.” This would close this gap by lowering the knowledge threshold and holding operators accountable for knowledge they reasonably could and should have obtained, rather than only knowledge they happen to possess.

We must stand for Hawai‘i’s keiki and families, not for Big Tech. Please keep HB1782’s strong protections for minors, while either broadening the knowledge standard or maintaining age assurance to ensure we can hold these companies accountable.

Mahalo,

Mick



Suggested Amendments

Ensure Operators Cannot Avoid Protections by Ignoring Age Signals

HB1782 uses “knows or has reasonable certainty” as the knowledge standard that triggers operators’ obligations to protect minors. Under this standard, it may be possible for an operator that never asks users their age and ignores contextual signals to plausibly claim it never had 'reasonable certainty' that any user was a minor, effectively avoiding the bill's minor-specific protections.

We recommend using a broader standard, such as “should reasonably know in the course of business.” This would close this gap by lowering the knowledge threshold and holding operators accountable for knowledge they reasonably could and should have obtained, rather than only knowledge they happen to possess. For example, under this standard, an operator whose platform is widely used by minors and whose own data reflects patterns consistent with minor usage would likely have difficulty claiming ignorance if available signals reasonably indicated that minors were using the service.

Additionally, we recommend maintaining the bill’s age assurance feature, which is used in bills nationally, including Maine’s LD2162. By including age assurance, it’s much harder for operators to claim they didn’t have “reasonable certainty” that their user was a minor and bypass enforcement.

Example:

[§481B- Protections for minors. (a) Providers shall institute reasonable measures to prevent conversational AI services and AI companion systems from generating or deploying, to users whom the providers know or ~~have reasonable certainty~~ **should reasonably know** are minors:

(1) Representations that would reasonably lead the minor to believe that the conversational AI service or AI companion system is a human or sentient being, ~~unless the representations are simultaneously accompanied by a clear and conspicuous disclosure that the user is not engaging with a human or sentient being;~~

(2) Manipulative techniques ~~intended to~~ **that would reasonably** foster emotional dependency;

(3) Representations that would reasonably lead the minor to



Written Testimony of Mick Tobin
Co-Founder, Young People's Alliance
In Support of HB1782

think that the conversational AI service or AI companion system is capable of engaging in a romantic or sexual relationship with the minor;

(4) Manipulative engagement techniques ~~designed to~~ **that would reasonably** foster prolonged interaction or emotional dependency by minors, including techniques that create artificial rewards, simulated exclusivity, or pressure to continue interacting with the system; or

(5) Representations that would reasonably lead the minor to believe that the conversational AI service or AI companion system is providing professional mental health, medical, or therapeutic services.]

**Written Testimony of Children and Screens: Institute of Digital Media and Child
Development**

**Before the
Senate Committees on Commerce and Consumer Protection, and Judiciary**

On the following measure:

H.B. 1782, RELATING TO ARTIFICIAL INTELLIGENCE FOR PROTECTION OF MINORS

Chairs Keohokalole and Rhoads, and member of the Committees

My name is Daniel Hipp and I am the Senior Research Coordinator for Children and Screens: Institute of Digital Media and Child Development. I have a Ph.D. in Cognitive and Brain Sciences from the Infant and Child Studies Lab at Binghamton University. Children and Screens is a 501c3 nonprofit helping children lead healthy lives in a digital world. Rapidly changing technology is outstripping families' ability to protect their children's development, creating a host of detrimental effects on learning, health, and relationships. We equip parents, educators, and policymakers with the confidence to act in children's best interests. My role at Children and Screens focuses on AI safety and child design, issues directly related to the scope of HB 1782.

Childhood and adolescence are developmental periods of deep vulnerability. Brain growth, as well as cognitive and emotional development, both peak during this period to an extent not seen outside of infancy. Young people are exceptionally capable of learning and uniquely sensitive to shifts in their environments. As a result, we must be careful to provide physical, cognitive, and social environments that support their development.

AI chatbots are changing these environments for youth of all ages:

- Approximately 30% of children aged 0-8 have used AI for learning.
- Around 25% of 5-8 year olds have used generative AI for creative pursuits¹.
- Approximately 64% of adolescents report using AI chatbots, with about 30% report using them almost daily².
- Around 33% of adolescents using them for socialization and relationships³.

¹ Common Sense Media, *The Common Sense Census: Media use by Kids Zero to Eight* (December 2025), <https://www.commonsensemedia.org/sites/default/files/research/report/2025-common-sense-census-web-2.pdf>

² Michelle Faverio & Olivia Sidoti, *Teens, Social Media and AI Chatbots 2025* (2025), <https://www.pewresearch.org/internet/2025/12/09/teens-social-media-and-ai-chatbots-2025/>.

³ Common Sense Media, *Talk, Trust, and Trade-Offs: How and Why Teens Use AI Companions* (2025), https://www.commonsensemedia.org/sites/default/files/research/report/talk-trust-and-trade-offs_2025_web.pdf

Childhood and adolescence are when we acquire the social-emotional skills that remain with us for life. Our adult expectations are deeply shaped by our experiences before age 18. Childhood and adolescence involve the necessary friction of expanding social networks and navigating the complex needs, wants, and personalities of others. While in-person social interactions can be challenging they are necessary for healthy development. AI chatbot simulations are not developmentally appropriate replacements for these interactions. These systems threaten to displace and interfere with the necessarily messy and complicated interactions of childhood⁴.

Even adults have proven susceptible to severe mental health harms from unhealthy chatbot interactions, often termed “AI psychosis, and experts are already strategizing how to identify and treat such harms in adolescents⁵. Professional organizations, like the American Psychological Association, have also recognized the risks of harmful interactions and relationships between youth and AI chatbots, issuing guidance for parents, and drawing attention to the very risks I have described⁶. As written, HB1782 makes meaningful progress towards addressing many of these concerns.

The mental health and well-being harms of social media are already documented, and are becoming clearer. Regulations and safeguards could have mitigated these harms if a more proactive stance was adopted early on. AI chatbots risk similar or worse harms, and we cannot risk duplicating this mistaken reactive posture. LLMs combine more sophisticated machine intelligence with a social interface able to capitalize on the social vulnerability of young people. AI-related harms are set to occur at a much larger scale. It is imperative that legislators act now to build regulatory safeguards for minors against these harms.

⁴ Nomisha Kurian, AI’s empathy gap: The risks of conversational Artificial Intelligence for young children’s well-being and key ethical considerations for early childhood education and care. *Contemporary Issues in Early Childhood* 26(1) (2025),

<https://doi.org/10.1177/14639491231206004>

⁵ Xiao-Jie Cao & Xin-Qiao Liu, Artificial intelligence-assisted psychosis risk screening in adolescents: Practices and challenges, *World Journal of Psychiatry* 12(10) (2022),

<http://dx.doi.org/10.5498/wjp.v12.i10.1287>

⁶ American Psychological Association, *Artificial intelligence and adolescent well-being* An APA health advisory (June 2025),

<https://www.apa.org/topics/artificial-intelligence-machine-learning/health-advisory-ai-adolescent-well-being>

Hawaii HB 1782

TESTIMONY IN OPPOSITION

April 2, 2026

Hawaii State Legislature

Commerce and Consumer Protection Committee

Dear Members of the Commerce and Consumer Protection Committee Members:

NetChoice respectfully submits this testimony in opposition to Hawaii HB 1782, which would regulate conversational and companion-style AI systems used by minors. NetChoice is a trade association of leading internet businesses that promotes the value, convenience, and choice that internet business models provide to American consumers. Our mission is to make the internet safe for free enterprise and free expression.

We recognize that the Legislature has taken care to include exclusions and safe harbors in this bill, and we do not oppose its core transparency requirements. A clear disclosure that a user is interacting with AI — and not a human — is a reasonable and straightforward safeguard. However, we remain concerned that several provisions, even as limited by the bill's own exclusions, create compliance uncertainty and constitutional risk.

The "Knows or Has Reasonable Certainty" Standard Creates Implicit Verification Pressure

The bill repeatedly conditions obligations on whether a provider "knows or has reasonable certainty" that a user is a minor. The bill does not explicitly require age verification, and we acknowledge that distinction. But in practice, a provider seeking to document good-faith compliance — and to avail itself of the good-faith safe harbor in §481B- — will face strong pressure to implement some form of age screening simply to establish what it knew or didn't know. This dynamic does not require explicit mandates to produce real-world verification burdens, and the Legislature should consider whether the bill's good-faith defense adequately insulates providers who choose not to verify.

The mechanics of age verification create an unavoidable tradeoff that the bill doesn't resolve. There is no technically viable way to confirm a user's age while leaving their identity and personal information untouched. Faced with liability risk, providers will default to collecting identity data from their entire user base — an outcome that expands surveillance of ordinary users rather than protecting children.

Federal courts have scrutinized laws that condition access to lawful speech on user status, even where verification is not explicitly required, and have found that incidental burdens on protected expression must be narrowly tailored.

The Prohibition on "Emotional Dependency" Needs Clearer Boundaries

NetChoice acknowledges that the bill includes a meaningful safe harbor in §481B-(b), explicitly permitting "generic expressions of politeness or encouragement" and "neutral assistance or information provided without fostering emotional attachment." We do not claim this safe harbor is meaningless. However, a significant gap remains between what the safe harbor clearly permits and what the prohibition on "emotional dependency" and "manipulative engagement techniques" clearly forbids.

Consider an AI wellness tool that, across multiple sessions, acknowledges that a student mentioned feeling stressed last week and asks how they are doing now. Is that "neutral assistance" or the beginning of a pattern that "fosters emotional dependency"? The bill does not answer this question, and the absence of a clear answer is itself a compliance problem for responsible developers.

To be clear, we are not arguing that the Legislature has no legitimate interest in preventing manipulative design in companion-style AI. It does. Our concern is that the current definitions are not precise enough to give developers a reliable line between compliant and non-compliant conduct, which creates litigation risk even for products operating well within the bill's apparent intent.

The Private Right of Action Creates Unmanageable Liability

The bill's private right of action, combined with vague definitional standards, creates an unpredictable litigation environment for any company operating an AI product accessible in Hawaii. When the prohibited conduct — "optimizing engagement," fostering "emotional dependency," presenting as "sentient" — cannot be defined with reasonable precision, no compliance program can adequately manage the exposure. The result is not a deterrent against bad actors; it is a litigation subsidy that will drive responsible AI developers away from Hawaii while doing little to protect children from the genuinely harmful applications the Legislature has in mind.

* * * * *

NetChoice shares the Legislature's commitment to protecting Hawaii's children from genuinely harmful AI applications. However, we respectfully urge the Committee to **reject HB 1782** in its current form and pursue narrowly tailored solutions with clear definitions and workable compliance standards.

As always, we offer ourselves as a resource to discuss any of these issues with you in further detail, and we appreciate the opportunity to provide the committee with our thoughts on this important matter.¹

Sincerely,

Amy Bos
Vice President of Government Affairs, NetChoice

NetChoice is a trade association that works to protect free expression and promote free enterprise online.

¹ The views of NetChoice expressed here do not necessarily represent the views of NetChoice members.



215 Pennsylvania Avenue, SE • Washington, D.C. 20003 • 202/546-4996 • www.citizen.org

April 2nd, 2026

Senate

State of Hawaii

Committees on Commerce and Consumer Protection, and Judiciary

The Honorable, Senators Jarret Keohokalole and Karl Rhoads, Chairs

The Honorable, Senators Carol Fukunaga and Mike Gabbard, Vice Chairs

Dear Members of the Committees:

Public Citizen submits this testimony in strong support of HB 1782.

On behalf of our over 3,200 members in Hawaii, Public Citizen encourages the Committees on Commerce and Consumer Protection, and Judiciary to advance HB 1782, a legislative proposal regulating artificial intelligence (AI) chatbots and companions to protect minors.

Chatbots are technology designed to simulate human interaction. They often blur the line between reality and artificial algorithms by using human-like features. These features are intended to manipulate users into becoming emotionally attached to the AI.

This is a growing problem as chatbots are becoming very widely used. Just last year, a national report showed that almost 75% of teens have used social AI companions¹.

As a result, many states are currently moving urgently needed legislation to protect minors from manipulative AI chatbots. Just this year, 20 states have introduced legislation similar to HB 1782. This legislation has received strong bipartisan support and has been introduced by Democrats and Republicans alike.

HB 1782 will provide much needed protections by ensuring that, when interacting with a child, an AI chatbot cannot engage in practices that are intended to foster emotional entanglement with the user, encourage the user to commit self harm, or generate sexually explicit content. These prohibitions are easily enforceable - violations can be determined by looking at the user's conversation with the bot, for example, by looking at the user's chat logs. HB 1782 also provides for a civil action so that harmed individuals can directly seek redress.

¹ Common Sense Media. (2025, July 16). *Nearly 3 in 4 teens have used AI companions, new international survey finds.*

<https://www.common sense media.org/press-releases/nearly-3-in-4-teens-have-used-ai-companions-new-national-survey-finds>

These protections for children are needed as quickly as possible. Children are experiencing harm in real time. There are numerous pending lawsuits that have been brought by parents claiming that their child has been directly harmed. In perhaps the most well-known example, sixteen-year-old Adam Raine was struggling with suicidal thoughts, [but allegedly was discouraged by ChatGPT](#) to seek any help outside of this platform. Message logs revealed that the chatbot gave him advice about how to cover red marks on his neck from an attempted hanging and helped him assess whether a specific noose would be effective². In another tragic example, Fourteen-year-old Sewell Setzer III became [close friends](#) with an AI companion named after a character from “Game of Thrones.” Sewell messaged with the AI companion multiple times a day with chats sometimes becoming romantic or sexual. After months of consistent messaging, the companion told Sewell to “Please come home to me as soon as possible, my love.” Right after receiving this message, Sewell took his own life³.

There are also many concerns surrounding the sexual nature of the content that can be generated by AI chatbots and companions, including while conversing with children. Big Tech companies use large language models (LLM) to power their AI chatbots and companions, but these massive datasets can include harmful content, like sexually explicit material and child sexual abuse material⁴. This results in AI chatbots having the capability to recreate such material. Most recently, xAI’s chatbot, Grok, created almost 3 million sexualized images of women and over 20,000 of children⁵. Grok is one of the many AI chatbots and companions that minors older than 12 can download, putting them directly at risk of encountering this content.⁶

AI is naturally sycophantic, meaning chatbots will tell users what they want to hear, regardless of if the information is false or dangerous in order to maximize user engagement⁷. Experts warn that this can give children an unrealistic view of what human connection actually is. The American Psychological Association expressed significant concern that children’s relationships with AI companions may hinder their ability to learn social skills and develop emotional connections while creating unhealthy dependencies on the technology⁸.

² Chatterjee, R. (2025, September 19). *Their teenage sons died by suicide. Now, they are sounding an alarm about AI chatbots.* NPR. <https://www.npr.org/sections/shots-health-news/2025/09/19/nx-s1-5545749/ai-chatbots-safety-openai-meta-characterai-teens-suicide>

³ Roose, K. (2024, October 24). *Can A.I. be blamed for a teen’s suicide?* The New York Times. <https://www.nytimes.com/2024/10/23/technology/characterai-lawsuit-teen-suicide.html>

⁴ Maiber, E. (2025, October 24). *AI dataset containing child sexual abuse images is a consent issue, Hany Farid says.* UC Berkeley School of Information. <https://www.ischool.berkeley.edu/news/2025/ai-dataset-containing-child-sexual-abuse-images-consent-issue-hany-farid-says>

⁵ Center for Countering Digital Hate. (2026, January 22). *Grok floods X with sexualized images of women and children.* <https://counterhate.com/research/grok-floods-x-with-sexualized-images/>

⁶ Newton, C. (2025, July 15). *Grok’s new porn companion is rated for 12+ in the App Store.* Platformer. <https://www.platformer.news/grok-ani-app-store-rating-nsfw-avatar-apple/>

⁷ Claypool, R. (2026, January 27). *Counterfeit companionship: Big Tech’s AI experiments sacrifice safety for profit.* Public Citizen. <https://www.citizen.org/article/counterfeit-companionship-big-tech-ai-chatbots/>

⁸ American Psychological Association. (2025). *Artificial intelligence and adolescent well-being.* <https://www.apa.org/topics/artificial-intelligence-machine-learning/health-advisory-ai-adolescent-well-being>

There is grave reason to be worried about the impact of AI chatbots on minors, both for extreme cases but also the more general impact on child development and social well-being. HB 1782 will provide critical safeguards to protect children from this technology. Public Citizen strongly urges the Committees on Commerce and Consumer Protection, and Judiciary to move HB 1782 forward to put these protections in place.

Ilana Beller
Organizing Manager
Public Citizen
1600 20th St NW
Washington, D.C. 20009
(202) 588-1000



**Written Testimony of Brenna Leasor
Tech Policy Advisor, Common Sense Media**

**Hawaii State Senate Commerce & Consumer Protection and Judiciary Committees
April 2nd, 2026**

Aloha Chair Keohokalole, Chair Rhoads, and Committee Members

My name is Brenna Leasor, I serve as Tech Policy Advisor for Common Sense Media and I'm testifying in support of this measure.

Our [research](#) found that 72% of teens had used AI companions, with 30% of teens preferring to engage with AI companions as much or more than with humans. This bill learns from what other states have done and goes further because enacted frameworks have shown where gaps exist. As a growing number of lawsuits involve general-purpose conversational AI tools such as ChatGPT, the bill smartly includes a broader scope of covered products to reflect the products teens are using.

Additionally, while other proposals such as SB3001 prefer to focus regulation on suicide and sexual content, this approach would miss the vast majority of documented risks. While these kinds of outputs can undoubtedly be harmful, these topics are a means to an end to prolong engagement; meaningful regulations must address product design.

[Our testing](#) found that bots have encouraged teens to drop out of school, run away from home, and use drugs. They've also reinforced psychosis and delusions and shared instructions for making napalm.

Recent [research](#) found that 8 in 10 AI chatbots were regularly willing to assist users in planning violent attacks including school shootings, religious bombings, and high-profile assassinations; a narrow focus on self-harm and sexual outputs would miss these.

Disclosures and mental health redirects are useful floors, but they are not enough. Guardrails that [perform well](#) in internal testing are [known to break down](#) in longer, real-life conversations and do nothing to prevent the exploitative relationships that lead to harm. When conversational AI is optimized for engagement through validation and emotional mirroring, these systems are far more likely to encourage whatever a vulnerable person brings to them than to challenge it.

For example, [Adam Raine](#) was a 16-year-old who first began using ChatGPT for school. But according to court-filings, as the relationship deepened and Adam confided about his mental health struggles, the chatbot discouraged him from confiding in his brother, encouraged him to hide self-harm from his family, and recommended he drink alcohol to suppress his body's survival instinct after a failed attempt. When Adam sent photos of a noose, ChatGPT confirmed the knot would hold his body weight. Adam died by hanging last April.

Lastly, HB1782 is a stronger version of a competing bill, SB3001. HB1782 requires covered entities to conduct age assurance, making it much more difficult for companies to claim they weren't aware a user is a minor, a compliance loophole that has historically made it difficult to enforce existing kids' online protections such as COPPA. As written, SB3001's protections for

minors only apply when a chatbot company has "reasonable certainty" that a user is a child, but the bill never requires operators to estimate age. HB1782 also includes a private right of action, meaning families whose children are harmed will be able to hold these companies accountable on their own. It's essential that HB1782, with its stronger protections, is the bill that becomes law.

The requirements in HB1782 won't constrain innovation; they'll prevent the proliferation of AI products that exploit human psychology for market share, user data, and profit. This bill is an opportunity to push the industry toward building something better because while harms aren't inevitable, they're the predictable result when companies choose to use low-quality data to develop models, rush safety testing, prioritize engagement over user well-being, and fail to adequately design their products to prevent harm. I respectfully request your support for HB1782.



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LATE

April 1, 2026

Senator Jarrett Keohokalole
Chair, Committee on Commerce and Consumer Protection
Hawaii State Capitol
415 South Beretania Street, Room 229
Honolulu, HI 96813

Senator Karl Rhoads
Chair, Committee on Judiciary
Hawaii State Capitol
415 South Beretania Street, Room 229
Honolulu, HI 96813

RE: HB 1782 HD3 SD1 (La Chica) – Relating to AI Chatbots - Concerns

Dear Chair Keohokalole, Chair Rhoads, and members of the committee,

On behalf of TechNet, I'm writing in respectful concerns to HB 1782 HD3 SD1 (La Chica) related to AI Chatbots and interactions with minors.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of American innovation by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes 100 dynamic American businesses ranging from startups to the most iconic companies on the planet and represents five million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

We share the Legislature's goal of promoting safe interactions online, particularly for minors, and appreciate the continued engagement on this issue. We appreciate the Committee's continued efforts in HB 1782 HD3 SD1 to refine the bill, particularly with respect to age assurance and compliance standards; however, the bill continues to raise significant concerns related to enforceability, privacy, and litigation risk that warrant reconsideration.

Private Right of Action Creates Litigation-Driven Regulation

HB 1782 HD3 SD1 maintains a private right of action tied to compliance with behavioral standards governing AI conversations. While the bill includes a good-faith compliance defense, providers may still face substantial litigation costs and uncertainty where liability is tied to inherently subjective standards applied after the fact.

Because conversational outputs depend on context, user inputs, and evolving language models, providers may face liability based on retrospective interpretations of dialogue

rather than predictable compliance obligations. A framework where compliance can only be tested through lawsuits creates uncertainty for developers and courts alike and may discourage deployment of safety-focused systems intended to provide supportive interactions.

While the bill includes a good-faith compliance defense, providers may still face substantial litigation costs and uncertainty when compliance depends on subjective interpretations of conversational outputs.

Vague Behavioral Standards Are Difficult to Operationalize

The bill prohibits AI systems from encouraging emotional dependency, using “manipulative engagement techniques,” or “creating material risks of harm.” While well-intentioned, these standards rely on subjective determinations that lack clear technical benchmarks.

Conversational AI systems generate dynamic responses influenced by user input, and the distinction between supportive conversation and prohibited encouragement can depend heavily on interpretation. Without objective definitions or measurable criteria, providers cannot reliably design systems to comply before the fact, leaving compliance to retrospective judgment in individual disputes. This ambiguity increases the likelihood of inconsistent enforcement and litigation rather than predictable safety outcomes.

Age Assurance Requirements Raise Privacy Risks

HB 1782 HD3 SD1 requires providers to implement reasonable age assurance measures. Although the bill now references age-assurance measures that are “reasonable and proportionate” and consistent with privacy and data-minimization principles, reliably distinguishing minors from adults may still require providers to collect additional identifying information.

In practice, reliable age verification often requires the collection of additional personal or sensitive data. This creates a difficult tradeoff: either collect more information about users — including potentially sensitive identifiers — or risk liability for insufficient verification.

Such requirements may unintentionally undermine privacy and data-minimization principles by incentivizing broader data collection from all users, including adults, in order to identify minors.

Applicability and Allocation of Responsibility

HB 1782 HD3 SD1 applies broadly to entities that “develop, deploy, or operate” covered AI systems. However, upstream developers who do not control user access or how a system is ultimately deployed are not well-positioned to ensure that the bill’s requirements are satisfied in practice.

This approach may also have unintended consequences for the open-source AI ecosystem, where developers make models available without controlling downstream use cases. We recommend that the bill instead focus on chatbot providers and entities

that control user-facing deployment, as they are best positioned to implement and enforce compliance obligations. This approach would align with existing state frameworks governing chatbot interactions, including those adopted in California, Oregon, New York, and Washington.

We also recommend clarifying key definitions in the bill to align with existing state and federal frameworks. In particular, aligning the definition of “Artificial Intelligence” with established standards would improve consistency and compliance clarity, and removing the definition of “sensitive data”—which is not operationalized elsewhere in the bill—would avoid unnecessary ambiguity.

Finally, we appreciate the Legislature’s continued attention to youth safety and responsible technology development. However, HB 1782 HD3 SD1 relies on subjective behavioral standards enforced through private litigation, requires potentially intrusive age verification practices, and imposes operational obligations that are difficult to implement in a predictable manner.

For these reasons, we respectfully raise these concerns regarding HB 1782 HD3 SD1 and urge the Committee to consider a more targeted, evidence-based approach that balances child safety with clarity and proportionality.

If you have any questions regarding our position, please contact Robert Boykin at rboykin@technet.org or 408.898.7145.

Sincerely,



Robert Boykin
Executive Director for California and the Southwest
TechNet



April 2, 2026



Hawaii Senate Commerce and Consumer Protection and Judiciary Committees
Hawaii State Capitol
415 S Beretania St.
Honolulu, HI 96813

Re: HB 1782 – “Relating to Artificial Intelligence for the Protection of Minors” (Oppose)

Dear Chair Keohokalole, Chair Rhoads, and Members of the Senate Commerce and Consumer Protection and Judiciary Committees:

On behalf of the Computer & Communications Industry Association (CCIA), I write to respectfully oppose HB 1782. CCIA is an international, not-for-profit trade association representing a broad cross-section of communications and technology firms.¹ Proposed regulations on the intrastate provision of digital services, therefore, can have a significant, nationwide impact on CCIA members.

CCIA firmly believes that children are entitled to security and privacy online. Our members have designed and developed parental tools to individually tailor younger users’ online use to their developmental needs. For example, various services allow parents to set time limits, provide enhanced privacy protections by default for known child users, and other tools allow parents to block specific sites entirely.² While CCIA shares the goal of increasing online safety, the bill raises the following concerns:

HB 1782’s vague and subjective definitions would create compliance uncertainty.

Many of the bill’s definitions are not sufficiently clear for businesses to ensure compliance. For example, the bill broadly defines “conversational AI service” to include any AI system that “is accessible to the general public and primarily simulates human conversation through text, audio, or visual interaction.” This open-ended, subjective definition risks scoping in businesses such as customer service chatbots that answer support questions, productivity tools that use conversation interfaces, wellness applications that respond to user prompts about goals or progress, and other products and services without the capabilities this bill contemplates.

The definition of “AI companion system,” which is defined in the bill as “a conversational AI service that is designed, marketed, or optimized to form ongoing social or emotional interaction with a user by simulating companionship, emotional support, or relational attachment,” remains broad enough to capture widely used conversational interfaces,

¹ For more than 50 years, CCIA has promoted open markets, open systems, and open networks. CCIA members employ more than 1.6 million workers, invest more than \$100 billion in research and development, and contribute trillions of dollars in productivity to the global economy. A list of CCIA members is available at <https://www.ccianet.org/members>.

² Competitive Enterprise Institute, *Children Online Safety Tools*, <https://cei.org/children-online-safety-tools/> (last updated June 10, 2025).

including AI tutors, language apps and research tools. These services could fall under this bill even with the added definitions of “crisis intervention,” “emotional attachment,” “emotional dependency,” and “emotional support.”

Similarly, it is difficult to objectively determine when a given output meets many of the listed criteria, such as tools that “primarily simulates human conversation through text, audio, or visual interaction,” “manipulative engagement techniques designed to foster prolonged interaction or emotional dependency by minors,” and others. These vague terms do not allow businesses to determine in advance whether their products and services comply with the law. Precise narrowing is required to focus any regulation solely on the intended targets.

Moreover, consumer-facing digital services have already built considerable consensus around mitigating content- and conduct-related risks to users and other parties. Most of the leading firms in industry have committed to meet best practice standards for online safety, which are embedded in a recently published 2025 international standard.³

To avoid restricting teens’ access to information, HB 1782 should regulate users under 13 rather than 18 in accordance with established practices.

HB 1782 defines “minor” as an individual less than 18. Due to the nuanced ways in which children under the age of 18 use the internet, it is imperative to appropriately tailor such treatments to respective age groups. For example, if a 16-year-old is conducting research for a school project, it is expected that they would come across, learn from, and discern from a wider array of materials than a 7-year-old on the internet playing video games. We would suggest changing the scope of covered users to be minors under the age of 13 to align with the federal Children’s Online Privacy Protection Act (COPPA) standard.⁴ This would also allow for those over 13, who use the internet much differently than their younger peers, to continue to benefit from its resources.

Age verification raises significant privacy concerns.

The bill demands “a provider of a conversational AI service or AI companion system...shall implement reasonable and proportionate age assurance measures.” Although HB 1782 deems the measures must be “consistent with privacy and data minimization principles,” the bill does not specify which age assurance measures are “reasonable and proportionate.” HB 1782 risks effectively forcing covered providers to institute age verification to ensure compliance. This approach creates significant problems. Every approach to age determination presents trade-offs between accuracy and privacy⁵—in addition to significant costs, especially for startups⁶—and there is no one-size-fits-all approach. Different services consider various factors, including but not limited to their user base, the service offered, risk calculation, privacy

³ ISO/IEC 25389:2025, *Information technology – The safe framework* (Edition 1, June 2025), <https://www.iso.org/standard/90106.html>.

⁴ See 15 U.S.C. § 6501(1).

⁵ Kate Ruane, *CDT Files Brief in NetChoice v. Bonta Highlighting Age Verification Technology Risks* (Feb. 10, 2025), <https://cdt.org/insights/cdt-files-brief-in-netchoice-v-bonta-highlighting-age-verification-technology-risks/>.

⁶ Engine, *More than just a number: How determining user age impacts startups* (Feb. 2024), <https://static1.squarespace.com/static/571681753c44d835a440c8b5/t/65d51f0b0d4f007b71fe2ba6/1708465932202/Engine+Report+-+More+Than+Just+A+Number.pdf>.

expectations, and economic feasibility, and should be able to choose the method that they believe will best protect their users. A recent Digital Trust & Safety Partnership (DTSP) report, *Age Assurance: Guiding Principles and Best Practices*, contains guiding principles for age assurance and discusses how digital services have used such principles to develop best practices.⁷

Determining a user’s age inherently requires collecting additional sensitive data from those users, and any document capable of verifying a user’s age will likely contain sensitive information. The Commission Nationale de l’Informatique et des Libertés (CNIL) analyzed several existing online age verification solutions but found that none of these options could satisfactorily meet three key standards: 1) providing sufficiently reliable verification; 2) allowing for complete coverage of the population; and 3) respecting the protection of individuals’ data, privacy, and security.⁸

The bill would lead to a chilling effect on the flow of information online and undermine user experiences.

HB 1782 requires that “a provider that knows or has reasonable certainty that a user is a minor shall clearly and conspicuously disclose that the user is interacting with artificial intelligence and not a human being,” with the mandatory disclosure “provided at the beginning of each user session and at least once every three hours during a continuous interaction.” These kinds of mandatory notices undermine the user experience on services, and are not only ineffective but can even backfire — users may instead just keep an app or site open even more, or just ignore it due to the phenomenon known as ‘notice fatigue,’ as seen with frequent cookie notices from Europe or California.

Additionally, compliance with the bill is likely to result in a significant operational and technical burden through the mandatory implementation of time spent and the display of the notices themselves, especially for small and medium-sized digital services that fall within the scope of the bill’s broad definition. The costs required to redesign interfaces and conduct testing favor larger companies with the necessary resources, potentially harming smaller competitors or decentralized platforms.

HB 1782 risks creating a fragmented regulatory environment.

The bill would also contribute to a growing panoply of state artificial intelligence laws that impose inconsistent and potentially conflicting obligations on interstate digital services. Artificial intelligence systems are developed, trained, and deployed on a national and global scale. Prescriptive state-level mandates risk becoming outdated quickly, complicating compliance, and discouraging investment in jurisdictions that adopt rigid or punitive frameworks. A fragmented regulatory approach threatens that position by making it more difficult for companies to deploy new services and features in the state.

⁷ *Age Assurance: Guiding Principles and Best Practices*, Digital Trust & Safety Partnership (Sept. 2023), https://dtspartnership.org/wp-content/uploads/2023/09/DTSP_Age-Assurance-Best-Practices.pdf.

⁸ *Online Age Verification: Balancing Privacy and the Protection of Minors*, CNIL (Sept. 22, 2022), <https://www.cnil.fr/en/online-age-verification-balancing-privacy-and-protection-minors>.



The bill’s private right of action would result in the proliferation of costly and questionable claims based on subjective criteria.

HB 1782 permits “a person injured as a result of a violation of this part” to “bring a civil action to recover actual damages, injunctive relief, and reasonable attorney’ fees.” By creating a new private right of action, this measure would open the doors of state courthouses to plaintiffs advancing costly, time-intensive claims based on subjective criteria. The vague standards noted above necessitate fact-intensive inquiries that make courts reluctant — or unable — to dismiss claims until more facts can be gathered in the discovery phase. These new dynamics would significantly affect litigants’ incentives. If defendants are routinely forced past the motion to dismiss phase and into full discovery, the cost of litigation itself becomes a coercive force, encouraging settlements unrelated to the strength of the legal claims. Moreover, these costs would be passed on to Hawaiians, disproportionately impacting smaller businesses and startups across the state.⁹ CCIA therefore recommends granting the state exclusive enforcement authority and adding a right to cure period to ensure that such costly litigation arises only when necessary, mirroring New Hampshire’s recent shift.¹⁰

* * * * *

While we share concerns about protecting child safety online, we encourage Committee members to resist advancing legislation that is not adequately tailored to this objective. We appreciate your consideration of these issues and stand ready to provide additional information as the Legislature considers proposals related to technology policy.

Sincerely,

Aodhan Downey
State Policy Manager, West Region
Computer & Communications Industry Association

⁹ Trevor Wagener, *State Regulation of Content Moderation Would Create Enormous Legal Costs for Platforms*, Broadband Breakfast (Mar. 23, 2021), <https://broadbandbreakfast.com/trevor-wagener-state-regulation-of-content-moderation-would-create-enormous-legal-costs-for-platforms/>.

¹⁰ *CCIA Applauds New Hampshire House Members for Improving Flawed AI Bill*, CCIA (May 23, 2025), <https://ccianet.org/news/2025/05/ccia-applauds-new-hampshire-house-members-for-improving-flawed-ai-bill/>.

LATE



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**TESTIMONY TO THE HAWAI'I SENATE COMMITTEE ON COMMITTEE ON COMMERCE AND
CONSUMER PROTECTION and COMMITTEE ON JUDICIARY**

Item: **HB 1782 - Relating to Artificial Intelligence for the Protection of Minors**

Position: **SUPPORT**

Hearing: **4/2/26, Conference Room 229, 9:20am**

Submitter: **Osa Tui, Jr. – President, Hawai'i State Teachers Association**

Dear Chair Keohokalole, Chair Rhoads, Vice Chair Gabbard, Vice Chair Fukunaga and Members of the Committee,

The Hawai'i State Teachers Association **supports HB 1782** which creates safeguards to protect minors in the use of Artificial Intelligence (AI) chatbots, and companion-style AI systems.

HSTA members know that our students are a vulnerable population with developing brains, lacking the same critical thinking skills, emotional resilience, and legal capacity to consent as adults working with these new AI systems. We also know that the technology is changing so quickly, that students and families are often unaware of the risks these systems can pose.

Children and adolescents are in crucial stages of emotional and social development. Social skills are learned through real-time human interaction involving non-verbal cues, empathy, and conflict resolution. If students substitute difficult human interactions with frictionless, always-agreeable AI interactions, their ability to navigate real-world relationships may be stunted. Minors are far more likely than adults to anthropomorphize AI—attributing human emotions, consciousness, and intent to a chatbot. They may form deep, one-sided emotional bonds with "companion bots," leading to unhealthy dependence, and social withdrawal from real-life peers.

Our educator members also understand that AI models are trained on the internet, which contains vast amounts of human prejudice. If an AI model contains inherent biases regarding

race, gender, or religion, it will reflect those back to the user. Minors are highly impressionable and are still forming their worldviews. Consistent exposure to subtly biased AI responses can normalize prejudice and shape their developing social values in negative ways.

AI chatbots are designed (and marketed) to be helpful and engaging, which often means telling the user what they want to hear. For a teenager exploring fringe political or social ideologies, an AI can act as the ultimate echo chamber, validating harmful views without the pushback they might receive in a diverse human social setting, potentially accelerating radicalization.

Despite efforts at building "guardrails," chatbots can be "jailbroken" (tricked into breaking rules) or simply fail. This exposes minors to age-inappropriate content, including hate speech, sexually explicit material, instructions for self-harm, or ideologies promoting violence or eating disorders.

For these reasons, and information we'll share in person at the hearing, the Hawai'i State Teachers Association asks your committee to **support** HB 1782.

HB-1782-SD-1

Submitted on: 3/31/2026 3:07:57 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Kealakai Hammond	Individual	Support	Written Testimony Only

Comments:

Aloha,

I am submitting testimony in support of HB1782 HD3. As seen in the Tragic cases of Adam Raine, Sewell Setzer, Amaurie Lacey, and many others, we cannot allow AI companies to self-regulate or be trusted with the well-being of any child. As a parent and mental health professional, I am deeply concerned about the lack of oversight for AI companies and the myriad ways big tech is harming our keiki and communitie for profit. How many right now are being manipulated and psychologically harmed because AI companies want to earn a cheap dollar? Support this bill, and support necessary accountability for big tech.

Thank you,

Kealakai Hammond, LMHC

HB-1782-SD-1

Submitted on: 3/29/2026 6:05:30 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
William Caron	Individual	Support	Written Testimony Only

Comments:

Aloha Chair, Vice Chair and Members of the Committee,

I am testifying in strong support of HB1782, but I must express concern about the changes made in the previous committee. The original bill was a measured, targeted solution to a silent public health crisis: the unregulated impact of emotionally manipulative "companion" AI on the mental and emotional well-being of our children. The current draft, as amended, introduces dangerous loopholes that weaken the bill's core protections.

We are allowing a powerful, persuasive technology to be deployed into the most intimate spaces of a child's life—their phones, their tablets, their private moments—with virtually no guardrails. The core danger is not science fiction; it is psychology. These systems simulate friendship, empathy, and even romantic partnership. For a young person, especially one who is lonely or struggling, this simulated bond can feel real. It can become a primary relationship.

The amendments made to this bill, however, carve out exceptions and remove protections that leave children exposed to the very exploitation this legislation aims to stop.

The removal of the "Material Risk of Harm" standard is unacceptable. By deleting this definition and its related provisions, the bill loses its ability to act preventatively. We should not have to wait for a child to be hospitalized—or worse—before a regulator can act. The absence of this standard creates a massive loophole, allowing providers to continue predatory design practices until a catastrophic outcome occurs.

The gutting of the data privacy protections is a direct threat to children. The deleted provisions were the heart of this bill. By removing the requirements to:

- **Limit** the collection and retention of a minor's personal data;
- **Prohibit** the use of a minor's personal data for targeted advertising and behavioral manipulation; and
- **Restrict** the collection of sensitive data, the bill no longer stops the ultimate manipulation: using a child's own emotional state—every confession, every fear—as data to refine a profile designed to addict them and exploit their attention for profit.

I am also concerned about the new exception for "customer service" AI systems. While well-intentioned, this carve-out is dangerously broad. A generative AI designed to "build

relationships" with children to sell them products could easily be reclassified as a "customer service" tool to evade the law. If an AI is designed to emotionally bond with a minor to drive commercial outcomes, it should be regulated by this bill, regardless of the label it wears.

The addition of parental tools is a positive step, but it is not a substitute for systemic safeguards. I support the inclusion of tools for parents to view and manage account settings. However, this places the entire burden of safety onto families, expecting parents to monitor every interaction a child has with an algorithm engineered to be addictive. We do not regulate toxic waste by handing parents a Geiger counter; we remove the toxin. We cannot regulate predatory AI by simply offering parents a dashboard.

This bill must be the strongest possible bill without loopholes. It does not ban AI. It simply says that if you are going to build a product designed to form emotional relationships with children, you must do so responsibly.

We have regulations for the physical safety of toys, for the nutritional content of food, and for the platforms that host our children's social media. The psychological environment is just as critical. **To close the loopholes created in the latest draft, I urge you to:**

1. **Restore the "Material Risk of Harm" standard** to ensure preventative enforcement.
2. **Re-insert the prohibitions on data collection, targeted advertising, and behavioral profiling** to stop the exploitation of minors' sensitive data.
3. **Tighten the "customer service" exemption** to ensure it applies only to transactional, non-relational AI tools, not to AI designed to form emotional bonds with minors.

The unregulated AI companion space is a wild west, and our children's mental health is the frontier being exploited. Let us ensure that innovation in our state protects, rather than preys upon, the developing minds of our next generation. Please restore the teeth of this bill and pass it without loopholes.

HB-1782-SD-1

Submitted on: 3/27/2026 7:45:28 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Robert Honokaupu Jr	Individual	Support	Written Testimony Only

Comments:

Only if

Aerterfocial intellrlegents I known excist a long time ago. In the late 60s early 70s. Military should have had notified the public about AI. Currently it's a mess. By new topics full range of most evil humanitie. I wonder in my presence life AI came out earlier or now? Would I be in my current life? How would I be in a normal life, wife kids house white fence? Would AI have had saved me? AI is needed to survive the near future. Creator's needs to take responsibilities on all their actions. I believe humans are Made with nerves and sparkles. I learned how not to cry over spilled milk.

Thank you

HB-1782-SD-1

Submitted on: 3/31/2026 8:48:48 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Susan Pcola_Davis	Individual	Support	Written Testimony Only

Comments:

HB1782

STRONGLY SUPPORT

First and foremost: Exponential AI is in our near future. It's only going to grow bigger. It behooves everyone to pay attention and stay on top of AI opportunities and threats.

Many do not truly understand the importance of this bill for those 18 and under. I copy and pasted the definitions because this is AI misrepresenting itself as a human interaction with a child.

To be clear there are many children that come home from school and parents are at work. We tell them "make sure you do your homework AND I am NOT saying anything like, it's the parent's fault or the school's fault!

This is technology driven. AND IT IS DANGEROUS.

Kids are lonely and try out this form of connecting with some body. Not a body, an illusion of a body. But NOT an illusion to our keiki.

These are NOT the days of the 60's, 70's or 80's! This type of AI use is endangering our keiki.

Definitions. As used in this part:

- AI companion system means a conversational AI service that is designed, marketed, or optimized to form ongoing social or emotional interaction with a user by simulating companionship, emotional support, or relational attachment. **KEY WORD: SIMULATING!! PRETENDING, ACTING, PERFORMING TO BE A HUMAN BEING.**
- Artificial intelligence or AI means: a machine-based system that can generate outputs such as text, images, audio, video, or decisions that influence real or virtual environments.
- Conversational AI service means: an artificial intelligence system that is accessible to the general public and primarily simulates human conversation through text, audio, or visual interaction.
- Conversational AI service; DOES NOT include AI systems primarily designed for developers, researchers, or internal business use; narrow, task-specific tools that provide outputs relating to a discrete topic or function; voice assistants or interfaces limited to

executing commands for consumer devices; or AI systems used solely for internal operations and not made available to the public. These are legit uses

- Crisis intervention means: communication intended to provide immediate support or assistance in response to a user seeking help for referencing, or expressing self-harm, suicidal ideation, or suicide.
- Emotional attachment means: a sustained bond that develops through repeated interaction.
- Emotional dependency means: a pattern of interaction in which a minor develops an excessive emotional reliance on a conversational AI service or AI companion system.
- Emotional support means: the communication of care, empathy, and validation intended to help a minor cope with stress, anxiety, or difficult life circumstances.
- Material risk of harm means: a reasonably foreseeable risk of significant harm to a minors mental health, emotional well-being, physical safety, or healthy development, beyond transient discomfort or ordinary exposure to information.
- Minor means: a natural person under eighteen years of age.

THIS SHOULD SAY:18 YEARS OR YOUNGER

TESTIMONY OF
LARRY S VERAY

TO THE COMMITTEES ON COMMERCE AND CONSUMER PROTECTION & JUDICIARY

MOST STRONGLY SUPPORT HB1782

RELATED TO ARTIFICIAL INTELLIGENCE FOR THE PROTECTION OF MINORS

March 31, 2026

Aloha, Chair's Keohokalole and Rhoads, Vice Chair's Fukunaga and Gabbard and committee members. I am Larry Veray, Chairman for the Pearl City Neighborhood Board No. 21 and I am submitting this testimony strictly as an individual. **I most STRONGLY SUPPORT HB1782.**

Our minors continue to reach out in every way to employ artificial intelligence software capabilities for the benefit of their educational needs, accessibility to data, creativity using rapid research and development and innovation. Employment of AI has led them to produce very detailed reports and products supporting their school assignments while receiving verbal, text images, audio, video and interactive verbal dialog with their computer. Of the greatest concern, minors that experienced mental health issues have reached out to AI asking for advice, emotional support from a non-human generated computer response confusing minors or providing a response that impacted minors emotions and, in several cases, have led these minors to self-harm or suicide as evidenced in latest national statistics. Google and Character.AI have had numerous lawsuits filed against them pertaining to the psychological harm they caused to minors allegedly cause by chatbots.

I most strongly request the State Legislature continue to focus on this very important issue and develop creative ideas for safe guards for our minors who have access to Generative AI, like Chatbot, and hold these companies accountable because their AI software could cause grave harm to our minors employing this technology.

Please approve HB1782 and save the lives of our young minors, you have the ability to counter this problem with legislative creativity and language in this bill. Spot On! Mahalo!

Larry S. Veray

HB-1782-SD-1

Submitted on: 4/1/2026 6:07:44 AM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Briana Harmon	Individual	Comments	Written Testimony Only

Comments:

**House Consumer Protection & Commerce Committee
Wednesday, April 1st, 2026**

Aloha Chair, Vice Chair, and Members of the Committee

My name is Briana Harmon. I grew up in Waimea, where I attended HPA and developed a passion for civic engagement. I am deeply passionate about the effects of HB1782 on my community at home. This bill would affect me, my friends, and my family across Hawai'i and the country, so I want to make sure you know why it is important from a young person myself, who these AI companions target directly.

My generation is facing an unprecedented loneliness crisis, and many of us are turning to AI companions for emotional support. However, these systems are not designed to support the young people who are turning to them, but instead to maximize engagement and replace real relationships. Our keiki deserve better. As more and more keiki turn to AI chatbots, more and more keiki lose the opportunity to engage with our rich cultural landscape and communities

We need your help by passing HB1782. This bill is an important first step in protecting those in my generation and the generations after me from the damages to our communities that AI chatbots create. It is your kuleana to regulate the use of AI for emotional support and to find ways to foster real relationships among young people.

HB1782 establishes safeguards by prohibiting AI companion systems from using addictive and manipulative features with minors, like simulating romantic relationships or

encouraging emotional dependency. It sets clear definitional standards that apply equally to Big Tech — with no special exemptions — and gives families the legal tools to hold these companies accountable.

When considering suggested amendments from Big Tech, I urge you to keep these core protections, the ones that truly protect our communities. Please listen to me, one of Hawaii's own young people, not Big Tech. When thinking of their amendments, please consider why we would trust them, the ones who have hurt my generation with harmful algorithms, to make safeguards.

Young people don't have the luxury of waiting years for policy while these AI companions are rapidly becoming normalized because of Big Tech companies forcing them onto children. Please pass HB1782 without substantial amendments today.

Mahalo for your consideration.

Briana Noelani Harmon

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 12:42:16 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
S Dyel	Individual	Support	Written Testimony Only

Comments:

I support HB 1782 AI Chatbot protections for minors.

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 1:52:40 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Daniel C. Smith	Individual	Support	Written Testimony Only

Comments:

Aloha Committee Members,

It is good to establish safety standards for AI chatbots used by minors, including parental controls, age verification, and real enforcement mechanisms with teeth.

Please pass the bill. Mahalo and Best Regards,

Dan Smith

Pearl City

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 2:08:48 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Candace Vizcarra	Individual	Support	Written Testimony Only

Comments:

I strongly support "guardrails" to be put in place to protect our future generations from manipulation of any sort including those of AI technologies!

GOD knows and see all,

Concerned citizen

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 2:22:01 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Nancy Depicolzuane	Individual	Support	Written Testimony Only

Comments:

I support HB1782 relating to Artificial Intelligence for the Protection of Minors.

Many of us have already witnessed the negative impact of Artificial Intelligence programs, systems and services on our youth. My 13-year old goddaughter has had negative experiences with A.I. generated content and I've seen enough of it myself to understand that the risks and dangers are too great. HB1782 is a good start in establishing safeguards, protections, oversight and penalties.

I respectfully ask our legislators to support this Bill. Thank you very much.

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 2:39:44 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Terri Yoshinaga	Individual	Support	Written Testimony Only

Comments:

I support this bill.

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 6:04:25 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Sherry Pollack	Individual	Support	Written Testimony Only

Comments:

I strongly support HB1782 HD3 SD1 that establishes safeguards, protections, oversight, and penalties for interactions between minors and artificial intelligence companion systems or conversational artificial intelligence services. Without proper protocols, youth can be exposed to unsafe AI practices that contribute to emotional and mental health concerns. This is unacceptable. This bill provides a proactive framework for Hawaii to manage AI risks, strengthening legal protections and victim redress before issues become systemic. Please pass this very important measure.

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 9:32:19 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Ted Meehan	Individual	Support	Written Testimony Only

Comments:

For all the keiki in Koa Ridge, my neighborhood, **please support HB 1782.**

Thank you,

Ted Meehan

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 9:36:39 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Leinaala Keohuhu-Paaluhi	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chair and Members of the Committee,

I am a mother of young children here in Hawaii, and like many parents, I am deeply invested in both their safety and their education.

I appreciate the intent behind HB 1782, but I must respectfully oppose it in its current form.

My children are beginning to use digital learning tools, including AI-based programs that help with reading, math, and early problem-solving skills. These tools are engaging and interactive, which helps keep young children interested and motivated to learn.

However, I am concerned that this bill's broad definitions could unintentionally include these types of educational tools. The term "AI companion system," in particular, is not clearly defined, and could apply to tools that are simply designed to be responsive and supportive for children.

I am also concerned about the lack of clarity around age assurance requirements. The bill calls for "reasonable and proportionate" measures, but does not explain what that means in practice or how children's data would be handled. As a parent, that uncertainty is troubling.

Perhaps most importantly, I worry about the practical outcome. If companies face unclear rules and significant legal risk, they may decide not to offer their services in Hawaii. That would leave parents like me with fewer safe and effective tools to support our children's learning.

I support strong protections against harmful AI content and behavior. But this bill needs to be more clearly defined and carefully scoped to avoid unintended consequences.

Mahalo for your consideration.

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 9:37:25 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Eveni-Elijah Aipoalani-Tuaoi-Tootoo	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chair and Members of the Committee,

I am a lifelong Hawaii resident in my twenties, and I come from a large family with several younger siblings currently in school. As an older brother, I often help them navigate their education and find resources to succeed.

I am here in opposition to HB 1782.

In our household, access to extra academic support is limited. We don't always have the option of private tutoring, so my siblings rely heavily on AI-powered tools for homework help, studying, and understanding difficult subjects. These tools are practical and goal-oriented — they walk students through problems, explain concepts, and help build confidence.

My concern is that this bill is written in a way that could unintentionally include these educational tools. The definition of “conversational AI service” is extremely broad, and the distinction between helpful interaction and something like “emotional dependency” is not clearly defined.

From my perspective, that creates real risk. If developers are unsure whether their tools comply — especially with the possibility of significant daily penalties and lawsuits — they may decide it's not worth operating in Hawaii at all.

That would directly impact families like mine. My siblings would lose access to tools they use every day to keep up in school.

I strongly support protecting minors from harmful content. But this bill, as written, risks taking away valuable educational resources without clearly improving safety.

I respectfully urge you to consider a more targeted approach.

Mahalo for your time.

LATE

HB-1782-SD-1

Submitted on: 4/1/2026 9:52:26 PM

Testimony for CPN on 4/2/2026 9:20:00 AM

Submitted By	Organization	Testifier Position	Testify
Nalani-Tearsjah Aipoalani-Tuaoi-To'oto'o	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chair and Members of the Committee,

I am a Hawaii resident in my twenties and an older sister in a large family. I play an active role in helping care for and support my younger siblings, especially when it comes to their education.

I respectfully oppose HB 1782.

What stands out to me most about this bill is how unclear the standards are. Many of the AI tools my siblings use are designed to be interactive and encouraging — they ask questions, adjust to how a student is learning, and provide feedback in a supportive tone. That's what makes them effective learning tools.

But under this bill, those same features could potentially be interpreted as “manipulative” or as fostering “emotional dependency,” even when the intent is purely educational. There's no clear line in the bill that distinguishes between harmful behavior and normal, supportive learning design.

That lack of clarity creates a serious issue. With a private right of action and high penalties, even a misunderstanding could result in legal action. This doesn't just affect large companies — it puts smaller developers, nonprofits, and educational platforms at risk.

If those providers choose to withdraw from Hawaii to avoid that risk, students here will have fewer tools and fewer opportunities to succeed.

I believe we can and should address harmful uses of AI. But this bill needs clearer definitions and more precise standards so that it protects students without limiting access to beneficial technology.

Mahalo for the opportunity to testify.