

June 9, 2026

The Honorable Buffy Wicks
California State Assembly, District 14
1021 O Street, Suite 5160
Sacramento, CA 95814

Dear Assemblywoman Wicks:

On behalf of tens of thousands of constituents, allied organizations, and more than 2,000 churches across California, California Family Council is proud to endorse AB 1946.

AB 1946 strengthens California's existing child sexual abuse material (CSAM) reporting framework by closing loopholes, accelerating response times, expanding who may report, and establishing meaningful civil enforcement. The bill builds on AB 1394 (2023) and aligns California with the federal TAKE IT DOWN Act (Pub. L. 119-12). California Family Council supports this legislation without reservation for the following reasons.

The Crisis Is Documented and Urgent

Reports to the National Center for Missing and Exploited Children's CyberTipline grew from approximately 500,000 in 2013 to over 36 million in 2023, a 72-fold increase in a single decade.¹ Roughly 500 CSAM files are traded online every minute. AI-generated child sexual abuse imagery increased 1,325 percent in a single year, from 4,700 reports in 2023 to 67,000 in 2024.² AB 1946 explicitly covers these digital forgeries, ensuring that "AI-generated" cannot become a loophole shielding predators from accountability.

Platforms Are Willfully Non-Compliant

California granted platforms an additional year to comply with AB 1394. Despite that accommodation, the Children's Advocacy Institute's independent evaluation found that none of the major platforms studied, including Instagram, Facebook, Snapchat, and TikTok, implemented reporting mechanisms meeting even basic standards of accessibility or clarity.³ Reporting pathways required five to seven clicks, used euphemistic language, and provided no legal transparency to users. These failures are not technical oversights. They are deliberate design choices by corporations whose annual revenues dwarf the cost of compliance. Meta allegedly maintained a policy of allowing 17 strikes before suspending accounts engaged in sex trafficking.⁴ Apple made only 267 CSAM reports in 2023, compared to 30.6 million by Meta and 1.47 million by Google.⁵

Key Reforms in AB 1946 Are Proportionate and Necessary

The bill's core provisions address documented failures. Expanding reporting rights beyond the depicted minor closes an obvious gap: a trafficked child may be too young, too traumatized, or entirely unaware that material exists online. The reduction from 30 days to 48 hours for platform response aligns California with the federal TAKE IT DOWN Act and reflects the documented harm caused by every additional hour material remains live. The mandate for human review of unmatched content addresses the documented inadequacy of algorithmic-only moderation. Civil penalties of up to \$250,000 per day, enforceable by the Attorney General and local prosecutors, provide the deterrent force absent from the current framework. Penalty funds directed to the Survivor Support Fund ensure that enforcement serves victims, not just the state treasury.

The growing national enforcement trend confirms this approach is warranted. West Virginia became the first state to sue Apple directly over CSAM distribution through iCloud, following Apple's reported 267 CSAM reports in 2023.⁵ California should not be behind West Virginia in holding platforms accountable.

No constitutional concerns have been raised by legislative counsel or civil liberties organizations. The bill is narrowly targeted at documented child sexual abuse material, not lawful speech. Industry concerns focus on compliance costs, not constitutional rights. The bill's 11-0 passage in the Privacy and Consumer Protection Committee and 12-0 in the Judiciary Committee reflect the breadth of agreement that these obligations are reasonable and overdue.

AB 1946 does not restrict parental authority, regulate lawful expression, or impose obligations on families or faith communities. It holds powerful corporations accountable for failing to meet legal duties they have already accepted and demonstrably failed to fulfill. For these reasons, California Family Council gladly **supports** AB 1946.

Respectfully,



Greg Burt
Vice President
California Family Council

References

- ¹ National Center for Missing and Exploited Children, "CyberTipline 2023 Report," NCMEC, 2024. <https://ncmec.org/gethelpnow/cybertipline/cybertiplinedata>
- ² National Center for Missing and Exploited Children, "CyberTipline 2024 Report," NCMEC, 2025. <https://ncmec.org/gethelpnow/cybertipline/cybertiplinedata>
- ³ Children's Advocacy Institute, "Child Cruelty by Design: Big Tech's Defiance of California's Child Online Safety Mandates," University of San Diego School of Law, 2025. https://catcher.sandiego.edu/items/usdlaw/08112025-Child_Cruelty_By_Design_Report.pdf
- ⁴ Jonathan Limehouse, "Meta Strike Policy and Sex Trafficking Violations," *USA Today*, November 22, 2025. <https://www.usatoday.com/story/tech/2025/11/22/meta-strike-policy-sex-trafficking-violations-testimony/87425612007/>
- ⁵ Washington Stand, "West Virginia Sues Apple Over iCloud's Alleged Role in Distribution of Child Sex Abuse Material," *Washington Stand*, February 19, 2026. <https://washingtonstand.com/article/west-virginia-sues-apple-over-iclouds-alleged-role-in-distribution-of-child-sex-abuse-material>
- ⁶ California Family Council, "From Congress to the Capitol: New Laws Take Aim at AI Child Abuse Material," *californiafamily.org*, June 2026. <https://www.californiafamily.org/2026/06/from-congress-to-the-capitol-new-laws-take-aim-at-ai-child-abuse-material/>