

Date of Hearing: June 23, 2026
Counsel: Mary Kennedy

ASSEMBLY COMMITTEE ON PUBLIC SAFETY

Nick Schultz, Chair

SB 1015 (Strickland) – As Amended April 9, 2026

SUMMARY: Makes it an alternate felony-misdemeanor offense, also known as a “wobbler,” for an adult to recruit a minor to commit an illegal act against another minor or to solicit physical harm or sexual conduct from a minor, or who uses a minor to facilitate any such acts and allows a minor who coerces another minor to engage in sexual conduct or obtain an image of an intimate body part to be prosecuted for extortion. Specifically, **this bill:**

- 1) Provides that any adult who, via any method of communication, recruits, induces, coerces, or persuades a minor to commit an illegal act against another minor, or to solicit physical harm, sexual conduct, or images of an intimate body part, from another minor, or who utilizes a minor as a conduit of communication to facilitate any of the foregoing is guilty of wobbler.
- 2) Provides that the exemption for minors in existing extortion law does not apply in cases where the minor has knowingly threatened, intimidated, or coerced another minor to cause any physical harm, engage in any sexual conduct, or obtain an image of an intimate body part from another minor, including an image of an intimate body part that is produced by artificial intelligence (AI) and depicts the identity of another minor.

EXISTING LAW:

- 1) Provides that a person who causes, induces, or persuades, or attempts to cause, induce, or persuade, a person who is a minor at the time of commission of the offense to engage in a commercial sex act, with the intent to effect or maintain a violation of several specified crimes related to sexual misconduct and extortion is guilty of human trafficking, as specified. (Pen. Code, § 236.1, subd. (c).)
- 2) Provides that any person who intentionally gives, transports, provides, or makes available, or who offers to give, transport, provide, or make available to another person, a child under the age of 16 for the purpose of any lewd or lascivious act, as defined, or who causes, induces, or persuades a child under the age of 16 to engage in such an act with another person, is guilty of a felony and shall be imprisoned in the state prison for a term of three, six, or eight years, and by a fine not to exceed \$15,000. (Pen. Code, § 266j.)
- 3) Provides that every person who knows, should have known, or believes that another person is a minor, and who knowingly distributes, sends, causes to be sent, exhibits, or offers to distribute or exhibit by any means, including by physical delivery, telephone, electronic communication, or in person, any harmful matter that depicts a minor or minors engaging in sexual conduct, to the other person with the intent of arousing, appealing to, or gratifying the lust or passions or sexual desires of that person or of the minor, and with the intent or for the purposes of engaging in sexual intercourse, sodomy, or oral copulation with the other person,

or with the intent that either person touch an intimate body part of the other, is guilty of a misdemeanor, punishable by imprisonment in a county jail not exceeding one year, or is guilty of a felony, punishable by imprisonment in the state prison for two, three, or five years. (Pen. Code, § 288.2, subd. (a).)

- 4) Provides that for the purposes of the above provision, an intimate body part includes the sexual organ, anus, groin, or buttocks of any person, or the breasts of a female. (Pen. Code, § 288.2, subd. (d).)
- 5) Provides that every person who contacts or communicates with a minor, or attempts to contact or communicate with a minor, who knows or reasonably should know that the person is a minor, with intent to commit specified sexual or violent offenses involving the minor shall be punished by imprisonment in the state prison for the term prescribed for an attempt to commit the intended offense. (Pen. Code, § 288.3, subd. (a).)
- 6) Provides that for the purposes of the above crime, “contacts or communicates with” shall include direct and indirect contact or communication that may be achieved personally or by use of an agent or agency, any print medium, any postal service, a common carrier or communication common carrier, any electronic communications system, or any telecommunications, wire, computer, or radio communications device or system. (Pen. Code, § 288.3, subd. (b).)
- 7) Provides that a person is guilty of sexual exploitation of a child if that person knowingly develops, duplicates, prints, or exchanges any representation of information, data, or image, including, but not limited to, any film, filmstrip, photograph, negative, slide, photocopy, videotape, video laser disc, computer hardware, computer software, computer floppy disc, data storage media, CD-ROM, or computer-generated equipment or any other computer-generated image that contains or incorporates in any manner, any film, filmstrip, or any digitally altered or artificial-intelligence-generated matter that depicts a person under 18 years of age engaged in an act of sexual conduct, and sets forth a definition of “sexual conduct,” as provided. (Pen. Code, § 311.3, subs. (a), (c).)
- 8) Provides that every person who, with knowledge that a person is a minor, or who, while in possession of any facts on the basis of which they should reasonably know that the person is a minor, hires, employs, or uses the minor to do or assist in specified acts relating to the creation and dissemination of child sexual abuse material (CSAM), shall be punished by imprisonment in the county jail for up to one year, or by a fine not exceeding two thousand dollars (\$2,000), or by both that fine and imprisonment, or by imprisonment in the state prison. (Pen. Code, § 311.4, subd. (a).)
- 9) Provides that every person who, with knowledge that a person is a minor under 18 years of age, or who, while in possession of any facts on the basis of which they should reasonably know that the person is a minor under 18 years of age, knowingly promotes, employs, uses, persuades, induces, or coerces a minor under 18 years of age, or any parent or guardian of a minor under 18 years of age who is under their control who knowingly permits the minor, to engage in or assist others to engage in either posing or modeling alone or with others for purposes of preparing any representation of information, data, or image, including, but not limited to, any film, filmstrip, photograph, negative, slide, photocopy, videotape, video laser disc, computer hardware, computer software, computer floppy disc, data storage media, CD-

ROM, or computer-generated equipment or any other computer-generated image that contains or incorporates in any manner, any film, filmstrip, digitally altered or AI-generated matter, or live performance, involving sexual conduct by a minor under 18 years of age alone or with other persons or animals, for commercial purposes, is guilty of a felony and shall be punished by imprisonment in the state prison for three, six, or eight years. (Pen. Code, § 311.4, subd. (b).)

- 10) Provides that every person who, with knowledge that a person is a minor under 18 years of age, or who, while in possession of any facts on the basis of which they should reasonably know that the person is a minor under 18 years of age, knowingly promotes, employs, uses, persuades, induces, or coerces a minor under 18 years of age, or any parent or guardian of a minor under 18 years of age who is under their control who knowingly permits the minor, to engage in or assist others to engage in either posing or modeling alone or with others for purposes of preparing any representation of information, data, or image, including, but not limited to, any film, filmstrip, photograph, negative, slide, photocopy, videotape, video laser disc, computer hardware, computer software, computer floppy disc, data storage media, CD-ROM, or computer-generated equipment or any other computer-generated image that contains or incorporates in any manner, any film, filmstrip, digitally altered or AI-generated matter, or live performance, involving sexual conduct by a minor under 18 years of age alone or with other persons or animals, is guilty of a felony. (Pen. Code, § 311.4, subd. (c).)
- 11) Makes it a crime for an individual to solicit, or agree to engage in, or engage in, an act of prostitution with another person who is a minor in exchange for the individual providing compensation, money, or anything of value to the minor. An individual agrees to engage in an act of prostitution when, with specific intent to so engage, the individual manifests an acceptance of an offer or solicitation by someone who is a minor to so engage, regardless of whether the offer or solicitation was made by a minor who also possessed the specific intent to engage in an act of prostitution. (Pen. Code, § 647, subd. (b)(3).)
- 12) Provides that if the crime of solicitation or agreeing to engage in prostitution is committed by a defendant who is 18 years of age or older, the person who was solicited was a minor at the time of the offense, and the defendant knew or should have known that the person who was solicited was a minor at the time of the offense, the violation is punishable by imprisonment in a county jail for not less than two days and not more than one year, or by a fine not exceeding \$10,000, or by both that fine and imprisonment, except as provided. (Pen. Code, § 647, subd. (l)(1).)
- 13) Makes it a wobbler if the crime specified above was committed by a defendant 18 years of age or older and the solicited minor was under 16 years of age at the time of the offense, or the person solicited was under 18 years of age at the time of the offense and the person solicited was caused, induced, or persuaded at the time of the solicitation to engage in a specified commercial sex act. (Pen. Code, § 647, subd (l)(2).)
- 14) Makes it a crime for a person to annoy or molest a child under 18 years of age, punishable as a misdemeanor by up to 1 year in county jail, a fine of \$5,000, or both, or as a wobbler if the defendant enters a home without consent. (Pen. Code, § 647.6, subds. (a), (b).)
- 15) Provides that every person 18 years of age or older who, in any voluntary manner, solicits, induces, encourages, or intimidates any minor with the intent that the minor shall commit a

specified felony, shall be punished by imprisonment in county jail for a period of 3, 5, or 7 years, but if the minor is 16 years of age or older at the time of the offense, this penalty only applies when the adult is at least five years older than the minor at the time the offense is committed. (Pen. Code § 653j, subd. (a).)

- 16) Provides that every person who, with intent to place another person in reasonable fear for his or her safety, or the safety of the other person's immediate family, by means of an electronic communication device, and without consent of the other person, and for the purpose of imminently causing that other person unwanted physical contact, injury, or harassment, by a third party, electronically distributes, publishes, e-mails, hyperlinks, or makes available for downloading, personal identifying information, including, but not limited to, a digital image of another person, or an electronic message of a harassing nature about another person, which would be likely to incite or produce that unlawful action, is guilty of a misdemeanor punishable by up to one year in a county jail, by a fine of not more than \$1,000, or by both that fine and imprisonment. (Pen. Code, § 653.2, subd. (a).)
- 17) Provides that extortion is the obtaining of property or other consideration from another, with his or her consent, or the obtaining of an official act of a public officer, induced by a wrongful use of force or fear, or under color of official right. (Pen. Code, § 518, subd. (a).)
- 18) Specifies that "fear," as such will constitute extortion, may be induced by a threat of any of the following:
 - a) To do an unlawful injury to the person or property of the individual threatened or of a third person.
 - b) To accuse the individual threatened, or a relative of his or her, or a member of his or her family, of a crime.
 - c) To expose, or to impute to him, her, or them a deformity, disgrace, or crime.
 - d) To report his, her, or their immigration status or suspected immigration status. (Pen. Code, § 519.)
- 19) Provides that every person who attempts, by means of any threat, such as is specified in the above provision, to extort property or other consideration from another is punishable by imprisonment in the county jail not longer than one year or in the state prison or by fine not exceeding \$10,000, or by both such fine and imprisonment. (Pen. Code, § 524.)
- 20) Defines "consideration," for the purposes of the crime of extortion, to mean anything of value, including the sexual exploitation of a child or an image of an intimate body part, as defined. (Pen. Code, § 518, subd. (b).)
- 21) Provides that the crime of extortion does not apply to a person under 18 years of age who has obtained consideration consisting of sexual conduct or an image of an intimate body part. (Pen. Code, § 518, subd. (c).)

FISCAL EFFECT: Unknown

COMMENTS:

- 1) **Sponsor:** Orange County Sheriff's Department
- 2) **Author's Statement:** According to the author, "Senate Bill 1015 closes a dangerous loophole in California law and gives law enforcement the tools they need to protect vulnerable children. Today, offenders exploit gaps in the extortion statute by manipulating minors into harming or exploiting other children. Existing law does not provide a clear pathway to hold someone accountable for recruiting or coercing a child to act as a conduit for threats, sexual exploitation, or self-harm of another child.

"As a father, I care deeply about the safety of our children. Violent online predators are targeting kids on social media and gaming platforms, grooming them, coercing them into producing explicit images or engaging in self-harm, and then using that material to blackmail them into exploiting others. SB 1015 creates a felony/misdemeanor offense for anyone who engages in that behavior, explicitly related to sexual conduct, intimate images, and AI-generated content.

"SB 1015 sends a clear message: the sexual exploitation of minors will not be tolerated. By closing this loophole and strengthening protections against minors, SB 1015 takes meaningful steps to protect our children and keep our communities safe."

- 3) **Criminal Liability for Using One Minor to Harm Another:** The author believes that there is a "dangerous loophole in the law" that fails to give law enforcement the tools they need to protect children. While there is no single generalized statute that covers all the conduct that the author cites as the impetus for this bill, several specific statutes do punish adult offenders for soliciting minors to commit crimes against or engage in illicit sexual conduct with other minors.

For instance, Penal Code sections 288.2 and 288.3 criminalize sending harmful material depicting sexual conduct to a minor and attempting to contact or attempt to contact a minor with the intent to commit certain sexual or violent offenses (many of which involve minors), respectively. Another provision makes it a felony for any person to cause, induce or persuade a child under 16 to engage in a "lewd or lascivious act" with another person (minor or not), while a series of statutes criminalize a range of conduct related to child sexual abuse material (CSAM), including using a minor to produce or distribute CSAM and inducing or coercing a minor to assist others in engaging in CSAM. (Pen. Code, §§ 311 et seq, Pen. Code, § 311.4) Other relevant statutes make it a crime to "annoy or molest" a minor under 18 (Penal Code Section 647.6, a misdemeanor), to solicit, induce, or intimidate any minor with the intent that the minor commit a specified felony (Penal Code Section 653j, a felony), and to use an electronic device to distribute personal identifying information (including pictures) for the purpose of causing the person injury or harassment by a third party (Penal Code Section 653.2, a misdemeanor).

In addition to these crimes, prosecutors can also pursue charges under the aiding and abetting statute, which imposes liability for the underlying crime on all individuals who have "advised and encouraged its commission," or who use a so-called "innocent agent" (referring to persons who do not have the mental capacity to possess the requisite criminal intent) as an instrument of a crime. (Pen. Code, § 31.)

- 4) **Adult recruiting a child to commit illegal acts against another minor:** This makes it a wobbler for an adult to “recruit, induce, coerce or persuade a minor to commit an illegal act against another minor, or to solicit physical harm, sexual conduct, or images of an intimate body part, from another minor, or who utilizes a minor as a conduit of communication to facilitate any of the foregoing.” Conduit of communication is defined as a minor whose digital identity or physical presence is used as a medium to transmit, relay, or facilitate the delivery of communications to another minor for the purposes of engaging in the conduct.

If an adult recruits, induces, coerces, or persuades a minor to and the minor actually commits the illegal act the adult would be considered a co-conspirator for that offense. It is unclear why statute necessary to criminalize that behavior. Would this apply if the minor was recruited, induced, coerced, or persuaded but did not actually commit the act, and if so, should it be punished as a wobbler?

Are the terms recruit, induce, coerce, or persuade all appropriate to cover behavior that could be charged as a wobbler? Should there always be some sort of inducement or other behavior that puts the minor in the position of thinking they must help the adult harm the other minor?

The conduct, either sexual in nature or physical, is all illegal so is another provision necessary for law enforcement to be able to prosecute these offenses?

- 5) **The Crime of Extortion:** The crime of extortion requires a showing that a person obtained something of value from another with consent but induced by a wrongful use of force or fear, or under color of official right, such as a public official obtaining something valuable under the pretense of their official authority. (Pen. Code, § 518, subd (a).) The “force or fear” must be the controlling reason that the other person consented – if another controlling reason induced the consent, the defendant is not guilty of extortion. (People v Goodman (1958)159 Cal. App2d 5 4,61) California’s extortion statute defines “fear” as inducing by a threat to do unlawful injury to person or property, to accuse the individual or a specified relative of committing a crime, to “expose a deformity, disgrace or crime,” to expose a secret affecting them, or to report their immigration status. (Pen. Code, § 519.) For the purposes of this provision, a “secret” is a fact unknown to the general public or to someone who might be interested in knowing that fact, and which harms the threatened person’s reputation or other interest so greatly that they would be likely to give the defendant anything of value to prevent it from being revealed. (CALCRIM No. 1830. Extortion by Threat or Force. *People v. Lavine* (1931) 115 Cal.App. 289, 295)

Prior to 2017, the crime of extortion only involved the obtaining of property induced by a wrongful use of force or fear. However, that year the Legislature passed SB 500 (Leyva), Chapter 518, Statutes of 2017, which expanded the crime to include the obtaining of any “consideration,” which means anything of value. SB 500 also defined “consideration” to include sexual conduct or an image of an intimate body part.

SB 500 also included an exemption to the crime of extortion, providing that the crime does not apply to any person under the age of 18 who has obtained consideration consisting of sexual conduct or an image of an intimate body part. The exception to extortion in SB 500 was made specifically to address the situation where one minor asks another to send an inappropriate picture or engage in sexual conduct. The amendment was made in recognition

that teenagers and their underdeveloped brains may behave inappropriately but that felony punishment may not be proportionate.

This bill creates an exception to this exception, allowing for a minor to be charged with extortion when they have knowingly threatened, intimidated, or coerced another minor to engage in any sexual conduct, or obtain an image of an intimate body part from another minor, including an image of an intimate body part produced by artificial intelligence. This effectively nullifies the exemption to the crime of extortion for minors.

The exception to the exception that this bill creates applies where a minor has knowingly threatened, intimidated, or coerced another minor to engage in sexual conduct or obtain an intimate image, actually appears to be a lower standard than the rest of the statute that requires extortion be by force or fear. Penal Code Section 519 defines fear for purposes of extortion: unlawful injury to a person or property; accusing the individual or their family member of a crime; exposing or imputing a deformity, disgrace or crime; exposing a secret; or reporting immigration status.

By requiring a threat, intimidation or coercion, the exception in this bill seems to lower the existing standard by, for example, a 16-year-old boy asking his 16-year-old girlfriend to send an inappropriate picture in exchange for prom tickets (coercion); or if she does not send him the picture he will not go to that party she wants him to go to (threat). This is clearly inappropriate and potentially harassing behavior but should it be a felony when the conduct is between minors?

- 6) **Argument in Support:** According to the *California District Attorneys Association*, “SB 1015 also expands California’s extortion statute by explicitly adding sexual conduct, intimate images, and explicit images generated by artificial intelligence (AI) to the categories of conduct that can be used to commit extortion. AI technology can now be used to create explicit deep-fake images from benign photographs posted on social media, leaving any one of us vulnerable to extortion. SB 1015 closes this gap and updates the statute in line with the available technology.”
- 7) **Argument in Opposition:** According to the *San Francisco Public Defender’s Office*, “The conduct motivating SB 1015’s proposed Penal Code Section 288.6 is covered by various existing laws. Our laws already criminalize any person who contributes to the delinquency of a minor by causing them to engage in illegal conduct. Moreover, our solicitation laws provide stricter sentences for causing any person to commit specified crimes, including causing someone to engage in lewd or lascivious acts with a child. On top of this, anyone who might fall under SB 1015’s proposed new crime, likely is already subject to our laws against aiding and abetting crimes or entering a conspiracy to commit a crime. The Legislature should not pass duplicative criminal laws – instead our state should focus our energy on protecting children through thoughtful investments, such as ensuring that every school is well-funded.

“Notably, to the extent that SB 1015 aims to increase sentences for behavior that is already criminalized under current law, the bill will not improve public safety. Harsher sentences do not deter crime, nor do they make victims whole. Even the federal Department of Justice discourages increased punishments, noting that such strategies do little to deter crime.

“Similarly, the provision of SB 1015 expanding extortion liability to minors also flies in the face of existing research and California’s best practices. California’s current youth justice framework reflects a deliberate shift away from punishment-first responses, underscored by our understanding of minor’s neurological development and capacity to mature. Children who misbehave should be held accountable and taught to learn from their mistakes, but they should not be routed through our criminal system which can have devastating impacts on their mental health, educational attainment, and economic security.”

8) **Related Legislation:** AB 2683 (Ransom) would have made any adult who solicits or recruits a minor to commit a felony guilty of child endangerment. AB 2683 was held in the Assembly Appropriations Committee.

9) **Prior legislation:**

- a) AB 355 (Sanchez), of the 2025-2026 Legislative Session, would have made the treat to post, distribute, or create AI generated images or videos of another enough to cause fear sufficient to constitute extortion. AB 355 was held in the Assembly Appropriations Committee.
- b) AB 1856 (Ta), of the 2023-2024 Legislative Session, would have made it a crime for an adult to intentionally create and distribute a deepfake of an intimate body part of another identifiable person. AB 1856 was held in the Senate Appropriations Committee.
- c) AB 2791 (Gabriel), of the 2019-2020 Legislative Session, would have made numerous changes to stalking, false emergency reports, and harassment. AB 2791 died in the Assembly Public Safety Committee.
- d) SB 500 (Leyva), Chapter 518, Statutes of 2017, expanded the crime of extortion to include not only the obtaining of property, but also the obtaining of other consideration, including sexual conduct or images of intimate body parts.
- e) AB 919 (Houston), Chapter 583, Statutes of 2008, made it a misdemeanor to, with the intent to place another person in reasonable fear for his or her safety of the other person’s immediate family, by means of electronic communication device, and without consent of the other person, and for the purpose of imminently causing that other person unwanted contact, injury, or harassment by a 3rd party, distributes specified identifying information that would be likely to incite or produce unlawful action.

REGISTERED SUPPORT / OPPOSITION:

Support

Orange County Sheriff's Department (Sponsor)
Arcadia Police Officers' Association
Brea Police Association
Burbank Police Officers' Association
California Association of School Police Chiefs
California Coalition of School Safety Professionals
California District Attorneys Association

California Narcotic Officers' Association
California Police Chiefs Association
California Reserve Peace Officers Association
California State Sheriffs' Association
Claremont Police Officers Association
Corona Police Officers Association
Culver City Police Officers' Association
Fullerton Police Officers' Association
Los Angeles County District Attorney's Office
Los Angeles County Sheriff's Department
Los Angeles School Police Management Association
Los Angeles School Police Officers Association
Murrieta Police Officers' Association
Newport Beach Police Association
Orange County Business Council
Orange County Department of Education
Palos Verdes Police Officers Association
Peace Officers Research Association of California (PORAC)
Placer County Deputy Sheriffs' Association
Pomona Police Officers' Association
Protection of the Educational Rights of Kids
Riverside County District Attorney
Riverside Police Officers Association
Riverside Sheriffs' Association
San Bernardino County Sheriff's Department
San Diego County District Attorney's Office
San Diego County Sheriff's Office
The California Baptist Capitol Ministry

Oppose

ACLU California Action
California Civil Liberties Advocacy
California Coalition for Women Prisoners
California Public Defenders Association
Californians United for a Responsible Budget
Ella Baker Center for Human Rights
Initiate Justice
Justice2jobs Coalition
LA Defensa
Local 148 Los Angeles County Public Defender's Union
San Francisco Public Defender
Sister Warriors Freedom Coalition
Smart Justice California, a Project of Beyond Impact

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