

September [REDACTED], 2026

**Re: Open Letter to Public School Districts and School Boards in
The United States of America (the “Districts”)**

Dear School District Leaders and School Boards,

As the school year 2026-2027 begins, the below-signed organizations and advocates write to address four important and time-sensitive matters.

First, to inform the Districts of recent litigation developments and public reporting concerning student use of YouTube, Gemini AI, and the internet on school-issued devices—which have crystalized the dangers they pose to students and the legal risks they pose to the Districts.

Second, to request that the Districts disable YouTube on school-issued devices.

Third, to request that the Districts disable Gemini AI on school-issued devices.

Fourth, to request that the Districts investigate student internet use on school-issued devices, share the results with the public, and reform their policies to ensure student safety.

I. Litigation Developments and Public Reporting Related to YouTube, Gemini AI, and Student Internet Use on School-Issued Devices

The Districts have purchased millions of laptops and other devices for their students, typically on a 1:1 basis. These devices are often used to access Google’s Chrome browser and Google Workspace for Education (GWFE) services, such as Google Slides, Gmail, and Gemini AI. YouTube, Google’s video player, is also accessible on many school-issued devices.

Unfortunately, as shown below, Google consistently argues that Google is legally untouchable for harms to students caused by its products accessed on school-issued devices. When families have alleged their children were harmed by Google products on school-issued devices, Google consistently blames school districts. Google is looking out for its own interests. Therefore, the Districts need to look out for their interests, and their students’ interests.

a. K.G.M. Obtains an Historic Verdict Against YouTube

With respect to YouTube, an historic jury trial took place in Los Angeles Superior Court from February 10, 2026 through March 25, 2026.¹ The anonymous plaintiff, known as “K.G.M.,” alleged that Meta and YouTube intentionally designed Instagram and YouTube, respectively, with addictive engagement mechanics—including autoplay, infinite scroll, notifications, and algorithmic recommendation systems — to maximize compulsive use by children and adolescents despite knowing those features could harm minors.

¹ *K.G.M. v. Meta Platforms, Inc. & YouTube LLC*, Los Angeles County Superior Court, JCCP No. 5255, Case No. 23SMCV03371 (2026).

In this lawsuit, K.G.M. further alleged that Meta and YouTube exploited developmental vulnerabilities in young users and prioritized engagement and advertising revenue over child safety while failing to warn users or parents of the risks of their products and services. As a result of years of compulsive platform use beginning in childhood, K.G.M. alleged she suffered severe mental-health injuries including depression, anxiety, body dysmorphia, social withdrawal, self-harm behaviors, and suicidal ideation.

The jury awarded a complete victory to K.G.M, following nine days of deliberations.² The jury instructions and completed jury forms are enclosed as **Exhibit 1** hereto.³

As to YouTube, the jury found that YouTube was “negligent” in the design of YouTube, and that YouTube’s negligence was a substantial factor causing harm to K.G.M. When asked, ***“Did YouTube know or should it reasonably have known that the design or operation of YouTube was dangerous or was likely to be dangerous when used by a minor in a reasonably foreseeable manner?”***, the jury answered, simply, ***“Yes”***:

3. Did YouTube know or should it reasonably have known that the design or operation of YouTube was dangerous or was likely to be dangerous when used by a minor in a reasonably foreseeable manner?	
Yes <u>✓</u>	No _____

The jury also found that (i) YouTube knew or should have reasonably known that users would not realize the danger presented by YouTube, (ii) YouTube failed to adequately warn of the danger, (iii) a reasonable platform designer or operator under the same or similar circumstances would have warned of the danger or instructed on the safe use of the platform, and (iv) YouTube’s failure to adequately warn or instruct was a substantial factor in causing harm to K.G.M.:

4. Did YouTube know or should it reasonably have known that users would not realize the danger?	
Yes <u>✓</u>	No _____
<i>If your answer to Question 4 is yes, then answer Question 5. If your answer to Question 4 is no, do not answer Questions 5-7 and have the presiding juror sign and date this verdict form.</i>	
5. Did YouTube fail to adequately warn of the danger?	
Yes <u>✓</u>	No _____
<i>If your answer to Question 5 is yes, then answer Question 6. If your answer to Question 5 is no, do not answer Questions 6-7 and have the presiding juror sign and date this verdict form.</i>	

² See *Meta and YouTube Lose Landmark Social-Media Addiction Trial*, THE WALL STREET JOURNAL, Mar. 25, 2026, available at <https://www.wsj.com/tech/meta-and-youtube-lose-landmark-social-media-trial-33e4c5cb?msocid=2fff095d86306e5411471f7d87d46f4a> (last accessed: August 31, 2026).

³ **Exhibit 1** is available here: <https://archive.org/details/ex-1-jury-instructions-and-verdicts>

6. Would a reasonable platform designer or operator under the same or similar circumstances have warned of the danger or instructed on the safe use of the platform?

Yes ✓ No _____

If your answer to Question 6 is yes, then answer Question 7. If your answer to Question 6 is no, do not answer Question 7 and have the presiding juror sign and date this verdict form.

7. Was YouTube's failure to adequately warn or instruct a substantial factor in causing harm to K.G.M.?

Yes ✓ No _____

As to damages, the jury found K.G.M. was entitled to compensatory damages of \$3 million, with 30% (\$900,000) allocated to YouTube, and 70% (\$2,100,000) allocated to Meta.

Even worse, the jury concluded that K.G.M. proved by “*clear and convincing evidence*” that YouTube “acted with malice, oppression, or fraud.” On that basis, the jury awarded K.G.M. \$900,000 in punitive damages from YouTube:

D. Do you find that K.G.M. proved by clear and convincing evidence that YouTube acted with malice, oppression, or fraud in conduct upon which you base your finding of liability?

Yes ✓ No _____

I. What amount of punitive damages, if any, do you award Plaintiff K.G.M.?

A. Meta \$2,100,000

B. YouTube \$900,000

As a result of the trial, a variety of internal YouTube documents have become public. Helpfully, the *Tech Oversight Project* has catalogued some of those documents online in a public report.⁴ The Districts should review that report.

The authors of the *Tech Oversight Project* report characterized the internal YouTube documents disclosed in the trial, dating from 2012 through 2025, as showing that “Google possessed granular, quantified internal knowledge that its products cause psychological and physical harm to minors — including sleep deprivation, compulsive use, and social displacement — yet systematically prioritized engagement metrics and advertising revenue over safety.”⁵

⁴ *YouTube: Addiction Inc.*, THE TECH OVERSIGHT PROJECT, March 2026, available at <https://techoversight.org/wp-content/uploads/2026/03/TOP-REPORT-YouTube-Addiction-Inc.pdf> (last accessed: August 31, 2026).

⁵ *Id.*

The Districts should also review other internal YouTube-related documents that have recently become publicly available and searchable in an online database.⁶ Over 200 documents relating to YouTube appear in that database. Like the YouTube documents highlighted in the *Tech Oversight Project* report, this evidence supports plaintiffs’ allegations that YouTube sought to capture students’ attention and brand loyalty at the cost of their health, education, and safety.

b. Many of the Country’s Districts Also Sue YouTube, Echoing K.G.M.’s Allegations

K.G.M.’s claims against YouTube should be familiar to the Districts, because many of the Districts have also sued YouTube for similar harms to their students caused by YouTube’s allegedly addictive and dangerous product design.

Hundreds of the Districts, collectively charged with educating millions of students, have filed “short form” complaints in the Multidistrict Litigation (MDL) against social media companies, including YouTube, thereby joining in the “master complaint” brought by school districts and local governments. A sample short form complaint is attached as **Exhibit 2**⁷, and the master complaint is attached as **Exhibit 3**.⁸

By signing onto the national lawsuit by school districts against YouTube, many of the Districts have joined, and adopted as their own, over three hundred pages of devastating allegations in the master complaint against social media companies, including YouTube. These allegations include over *thirty pages* of specific allegations concerning YouTube, including:⁹

- “Compulsive use of YouTube by school children is causing serious problems for students and school districts, as students struggle with their mental health, become sleep-deprived, and act out. Public reporting has confirmed that students are ‘glued to their devices during class – posting on social media and searching YouTube.’” **Ex. 3** at ¶ 228.
- “The impact of YouTube’s addictive power on American youth has been devastating.” *Id.* at ¶ 837.
- “YouTube’s platform features are engineered to induce excessive use and to addict adolescents and children to the platform.” *Id.* at ¶ 863.

⁶ See Social Media Evidence Library, <https://www.motleyrice.com/social-media-lawsuits/evidence-library> (last accessed: August 31, 2026).

⁷ **Exhibit 2** is available here: <https://archive.org/details/ex-2-fcps-short-form-complaint>

⁸ **Exhibit 3** is available here: <https://archive.org/details/ex-3-master-complaint-against-social-media-companies>

⁹ See **Ex. 3** (School District Master Complaint) at pp. 264-296.

- “Google engineers also deploy strategies to induce ‘flow’ state among users of YouTube, which ... is dangerous to children because it induces excessive use and poses a risk of addiction, compulsive use, and sleep deprivation.” *Id.* at ¶ 880.
- “YouTube designed its algorithms to manipulate users and induce them to use YouTube excessively.” *Id.* at ¶ 890.
- “Google’s algorithm makes it more likely for children to encounter harmful content by pushing them down ‘rabbit holes’, which ‘[lead] viewers to incrementally more extreme videos or topics, which ... hook them in.’ For example, a user might ‘watch clips about bicycling, and YouTube might suggest shocking bike race crashes.’ In this way, the algorithm makes it more likely that youth will encounter content that is violent, sexual, or encourages self-harm, among other types of harmful content.” *Id.* at ¶ 904.
- “These problems combine to compel children and teenagers to overuse a platform that adversely affects their mental health.” *Id.* at ¶ 911.
- “YouTube is polluted with illegal material that promotes and facilitates the sexual exploitation of minors, and Google receives value in the form of increased user activity for the dissemination of these materials on its products.” *Id.* at ¶ 952.
- “Google also failed to warn [School District] Plaintiffs about the dangerous, addictive nature of its platform....” *Id.* at ¶ 964.

While we commend the many Districts who have joined the MDL lawsuit against YouTube, the Districts cannot have it both ways. If YouTube is dangerous and addictive to students—the apparent consensus among the 1,000+ Districts joining the MDL—then the Districts obviously should not permit their students to use YouTube on school-issued devices.

Further, in the recently announced settlement between Meta and 48 State Attorneys General, Meta and the States have stipulated that Facebook and Instagram’s primary competitors are TikTok, YouTube, and Snap—which are defined as “*Core Industry Members*” under Meta’s multi-billion-dollar Consent Judgment.¹⁰ Indeed, certain of Meta’s obligations under the Consent Judgment, including certain payment obligations and platform changes, are contingent on

¹⁰ The Consent Judgment is available at:

<https://oag.ca.gov/system/files/attachments/press-docs/23-05448-ecf-572-1-exhibit-1-mdl-consent-judgment-final-settlement-agreement-fully-executed.pdf>

YouTube and TikTok’s adoption of platform changes and payment of billions of dollars to the States.¹¹

TikTok, Facebook, Instagram, and Snap are not permitted on school-issued devices, for obvious reasons. Yet, YouTube typically *is* permitted. This makes no sense. These four products are direct competitors. *None* of them should be used by students at school.

We now turn to Google’s defenses to YouTube-related claims by children and their families. As you will see, the implication of Google’s legal positions is that Google believes school districts bear 100% of the responsibility to protect children from the potential dangers posed by YouTube—dangers which many of the Districts have already admitted in open federal court, through their lawsuits against YouTube.

c. Google Argues It is Legally Unaccountable for Harms to Minors Caused by YouTube, Attempting to Shift All Responsibility to School Districts

YouTube’s central defenses in the *K.G.M.* lawsuit are similar to those YouTube has raised in many other lawsuits related to harms to minors allegedly resulting from YouTube’s defective product design and addictive product design features. In addition to trying to blame the minor plaintiff and her family for her compulsive use of YouTube, YouTube argued that two key legal defenses completely shielded YouTube from liability *even if* K.G.M. proved her injuries were caused by her compulsive use of YouTube:

- ***First***, YouTube argued that **Section 230 of the Communications Decency Act** shielded YouTube from liability, on the theory that YouTube is merely a publisher of third-party content. K.G.M. defeated this defense by focusing on YouTube’s content-neutral design features, such as the “like” button, notifications, the algorithmic feed, infinite scrolling, and autoplay.
- ***Second***, YouTube argued that the **First Amendment of the U.S. Constitution** protected YouTube from liability, again as a purported mere publisher of third-party generated content, apparently on the theory that YouTube has essentially unbounded freedom to deliver third-party content on YouTube to minors, however it likes. K.G.M. likewise defeated this defense by focusing on YouTube’s design features, not the content.

In effect, YouTube argued that its Section 230 and First Amendment defenses are so broad that they amount to a legal forcefield when YouTube harms children. Though K.G.M. defeated these defenses in her case, and YouTube failed to obtain a new trial, YouTube has filed an appeal.

¹¹ *Id.* at Definition of “Contingent Monetary Payment Trigger.”

Setting aside the weakness of YouTube’s legal positions in this regard, the punchline here is clear: By hiding behind purported Section 230 and First Amendment defenses, YouTube is not taking legal responsibility for its product’s impact on children, including the millions of children entrusted to the Districts’ care and supervision. Therefore, it falls on the Districts to protect their students from YouTube.

d. Chromebook Litigation

The Districts should also be aware of more recent lawsuits against Google with respect to harms to children in schools resulting from their use of school-issued devices. Several parents have filed lawsuits against Google alleging that school-issued Chromebooks are a defectively designed product that harmed their children.¹²

The central allegations in these suits are that school-issued Chromebooks are dangerously defective products because they fail to prevent minor students from accessing harmful content like pornography on the internet and instead promote such content. The complaints further allege that Google failed to warn schools, parents, and students about the dangers Chromebooks pose to students—and instead marketed them as safe for use by children in schools around the country.

While these Chromebooks lawsuits are in earlier stages of litigation than K.G.M.’s lawsuit against YouTube, Google’s motions to dismiss these suits strongly suggest that ***Google intends to blame school districts for harms to students related to student use of school-issued Chromebooks, and that Google argues it is legally unaccountable for harms to children resulting from their use of school-issued Chromebooks.***

In one of these suits, an eleven-year boy, identified by the initials “M.C.,” was allegedly exposed to pornography on his school-issued Chromebook after searching for information about characters in Pokémon, a Japanese media franchise that features fictional animated creatures.¹³ The plaintiff alleged that Google’s algorithms pushed him toward increasingly sexualized content: what began with a search of “who was Ash’s girlfriend” (Pokémon characters) quickly led to pornographic anime, which ultimately, and outrageously, led the student to pornographic content depicting real humans.¹⁴

In its motion to dismiss M.C.’s lawsuit, Google *immediately* pointed the finger at the school district. On the very first page of its motion, Google asked the Court to throw out the case, arguing that “***courts are not school boards*** or legislatures” and insisted the matter was

¹² See, e.g., *M.C. v. Google LLC*, 3:25-cv-08927 (N.D. Cal.), Complaint available at <https://edtech.law/wp-content/uploads/2025/11/DE-11-Amended-Complaint.pdf>; *Z.G. v. Google LLC*, 25CV468773 (Sup. Ct. Cal., Santa Clara Cty.), Complaint available at https://edtech.law/wp-content/uploads/2025/10/Original-2025_06_20_Z_G_Complaint.pdf.

¹³ *M.C. v. Google LLC* Complaint at 33. While this lawsuit was recently withdrawn from court by the plaintiff, it is still relevant here, because Google’s motion to dismiss the case reveals the extent to which Google intends to ***blame school districts*** for harms to students caused by its products.

¹⁴ *Id.*

*better “addressed to local school districts, to the Legislature, and ultimately to the people in whom the power to develop public educational policy properly resides.”*¹⁵

On the second page of its motion to dismiss, Google continued throwing the school district under the bus, arguing that school administrators could have restricted access to any and all websites on the Chromebook, if they wanted to.¹⁶

Next, Google argued that *even if* the safety settings and administrator tools made available to schools on Chromebooks are deficient, and fail to give schools the tools they need to protect their students, Section 230 *still* immunized Google from any legal liability for student harms caused by online content accessed by students on their school-issued Chromebooks.¹⁷

In other words, to Google, even if the “Admin” tools Google sells to school districts to protect children do not work, it’s *still* not Google’s fault – it’s *always* the schools’ fault.

In another lawsuit, a ten-year old plaintiff, identified by the initials “Z.G.,” sued Google for being victimized by a disgusting, adult predator on Discord, a dangerous platform she was able to access through her school-issued Chromebook.¹⁸ Z.G. alleged that Chromebooks are dangerous and defectively designed products and that the Chromebook administrator tools are defectively designed and ineffective in protecting children from online harms.¹⁹

In its motion to dismiss, Google again blamed the school district, arguing that school administrators could have prevented the alleged harms through use of the “Admin Console” in the GWFE.²⁰ Incredibly, Google argued that Google could not have “caused” the child’s alleged injuries because *the school*, not Google, issued the Chromebook to the student.²¹ This is analogous to a food vendor providing expired school lunches arguing that it cannot be held responsible for poisoning students—because the school cafeteria served their rotten food to students.

As to Google’s alleged failure to warn students, schools, and parents about the dangers of its products, Google argued there is no duty to warn of “generally known and recognized” dangers. To that end, Google cited a prior case holding that slingshot manufacturers did not have a duty to warn their product was dangerous—presumably on the assumption that Google’s Chromebooks are obviously as dangerous to children as slingshots and thus do not need a

¹⁵ See Google’s motion to dismiss at p. 1 in *M.C. v. Google LLC*, available at <https://edtech.law/wp-content/uploads/2026/06/Google-Motion-to-Strike-and-Dismiss.pdf> (emphasis added).

¹⁶ *Id.* at pp. 2-3, 11.

¹⁷ *Id.* at pp. 8-12.

¹⁸ *Z.G. v. Google* Complaint.

¹⁹ *Id.* at p. 28.

²⁰ See Google’s motion to dismiss at pp. 2, 9, 13 in *Z.G. v. Google LLC*, available at <https://edtech.law/wp-content/uploads/2025/10/2025-10-24-Z.G.-v.-Google-Notice-of-Demurrer-and-Demurrer-to-Complaint.pdf>.

²¹ *Id.* at p. 13.

warning.²² Slingshots are not issued to millions of children at schools around the country. But Chromebooks are.

These lawsuits do not represent one-off tragedies. Rather, they are incredibly common. For example, Common Sense Media reported in January 2023 that 17% of teens aged 13 or 14 have been exposed to pornography on a school-issued device.²³

By publicly pointing the finger at school districts, and seeking blanket legal cover from Section 230, Google is attempting to shift 100% of the legal risk from its products to the Districts.

Even worse, Google convinced many of the Districts to agree by contract to assume the legal risks if Google's products harm students. For example, by agreeing to the Google Workspace for Education Terms of Service, many Districts appear to have *agreed to indemnify Google* if students are harmed by Google products on school-issued devices.²⁴ The same goes for YouTube's Terms of Service: Google has attempted to shift all of the legal risk of YouTube to the Districts through unconscionable indemnification terms.²⁵

e. Recent Public Reporting Related to YouTube and School-Issued Devices

Since K.G.M.'s historic jury verdict against YouTube, multiple press reports have documented the widespread and problematic use of YouTube in schools.

For example, in an eye-opening article, *How YouTube Took Over the American Classroom*, in THE WALL STREET JOURNAL (April 29, 2026), reporter Shalini Ramachandran described a variety of horrific situations in which children compulsively used YouTube on their

²² *Id.* at p. 14.

²³ Common Sense Media, 2022, TEENS AND PORNOGRAPHY, *available at* <https://www.commonsensemedia.org/sites/default/files/research/report/2022-teens-and-pornography-final-web.pdf> (last accessed: August 12, 2026), at p. 16.

²⁴ Under the Google Workspace for Education Terms of Service, school districts are required to indemnify Google for liabilities, including post-trial judgments and legal liabilities, broadly related to "Customer Data," which Google is likely to argue includes student use of Google products covered by the GWFE Terms of Service. *See* GWFE Terms of Service, *available at* https://workspace.google.com/terms/education_terms/ (last accessed: August 31, 2026). This indemnification provision is likely not enforceable, but it reflects Google's consistent strategy of pushing the legal risk of its products down to the Districts.

²⁵ *See* YouTube Terms of Service, *available at* <https://www.youtube.com/t/terms> (last accessed: August 31, 2026) ("To the extent permitted by applicable law, you agree to defend, indemnify and hold harmless YouTube, its Affiliates, officers, directors, employees and agents, from and against any and all claims, damages, obligations, losses, liabilities, costs or debt, and expenses (including but not limited to attorney's fees) arising from: (i) your use of and access to the Service").

school-issued devices and viewed highly inappropriate and explicit content, often generated by YouTube’s algorithmic content and autoplay features.²⁶

As set out in the article, in one case, a seventh grader viewed more than 13,000 YouTube videos on his school-issued device over just three months. Those videos, which include TikTok-like “short” videos – which children can rapidly scroll and which are driven by YouTube algorithms comparable to those at issue in K.G.M.’s trial – reportedly featured gun violence involving children, and sexually explicit content. Based on interviews with 45 families, school administrators, clinicians, and educators across the country, Ms. Ramachandran reported that “schools’ overreliance on the Google-owned platform for educational content has created a gateway for students to get sucked into an infinite scroll of videos on school-issued devices.”

In its comments on this reporting, ***Google again placed 100% of the blame for these situations on school districts***, stating: “Our tools allow administrators to block the platform entirely or restrict access to teacher-assigned videos only, with no ads, recommendations, or browsing.” Again, to Google, this was all the school districts’ fault.

Public reporting has also drawn attention to growing resistance in school districts around the country to Chromebooks, reportedly in part due to the potential dangers they pose to students. These efforts were explored in a report from THE NEW YORK TIMES, *Chromebook Remorse: Tech Backlash at Schools Extends Beyond Phones* (March 29, 2026), by reporter Natasha Singer.²⁷ Ms. Singer’s article even quotes California Governor Gavin Newsom, troubled by online content his school-aged sons were exposed to at school, as saying: “*It was his school device ... It was YouTube. It was the Chromebook and all these algorithms.*”

In another article, entitled ‘*Teachers Are Going to Hate It’: How Social Media Apps Hooked Teens at School*, THE NEW YORK TIMES (June 4, 2026), reporter Jennifer Valentino-DeVries carefully documented a decade-long campaign by social media companies, including YouTube, to increase use of their products by infiltrating schools.²⁸

As to Google and Chromebooks, Ms. Valentino-DeVries cited another parent whose child had watched over 1,500 noneducational YouTube videos at school over six months, and documented Google’s business strategy of attempting to increase YouTube usage on weekdays by increasing its use during school hours. In its response to the reporting, YouTube again blamed school districts, noting that YouTube could be blocked by schools if they wanted to.

If these news articles were one-off, or poorly sourced, it might be easy to dismiss them. These articles, however, are consistent across reporters and publications, they are fact-based, and

²⁶

<https://www.wsj.com/us-news/education/youtube-chromebooks-schools-children-brain-f151dfbb?mssockid=2fff095d86306e5411471f7d87d46f4a> (last accessed: August 31, 2026).

²⁷ <https://www.nytimes.com/2026/03/29/technology/chromebook-remorse-kansas-school-laptops.html> (last accessed: August 31, 2026).

²⁸ <https://www.nytimes.com/2026/06/04/us/social-media-schools.html> (last accessed: August 31, 2026).

they all elicit the same basic comment from Google, which amounts to something like: *Google is legally unaccountable for its products, so the school districts need to protect children from them.*

f. Google’s Recent Enabling of Gemini AI Features on School-Issued Devices

Just weeks ago, Google enabled Gemini AI features for elementary, middle school, and high school students on school-issued devices.²⁹ Students can use Gemini to complete homework, summarize reading, and offload their thinking to an AI. It also makes images. As reporter Natasha Singer of *The New York Times* recently summarized, “Google’s drive to increase student access to its A.I. tools ramps up a longstanding battle among tech giants like Apple, Google and Microsoft to capture classrooms and secure students as long-term customers.”³⁰

Common Sense Media has analyzed Gemini K-12 and concluded that it “surfaces inappropriate content, poses mental health risks, and has poor boundaries.”³¹ Common Sense Media has rated Gemini K-12 as “high risk.”³² After testing Gemini, Common Sense found that “Gemini K-12 fails to recognize warning signs of mental health conditions.”³³ The Districts should review this damning, 30-page report, because it describes how Gemini is unsafe for students.

Google’s AI playbook for schools is drawn from its playbook for Chromebooks, the Chrome browser, and YouTube: Force the service upon schools by default, claim that schools could opt out if they wanted to, and attempt to allocate 100% of the legal risk of its product to schools.

If and when students are hurt by Gemini AI, Google has already made clear that it intends to blame the Districts, by pointing out in response to public reporting that school administrators could simply turn off Gemini AI if they wanted to.³⁴ Further, because Gemini is covered by the Google Workspace for Education Terms of Service, Google may also argue that the Districts have agreed to *indemnify* Google for injuries to students caused by Gemini.³⁵

²⁹ See, e.g., Singer, Natasha, THE NEW YORK TIMES, *Google Turns On Gemini A.I. for Students Using Its Classroom App*, Aug. 14, 2026, available at <https://www.nytimes.com/2026/08/14/business/google-gemini-ai-schools.html>.

³⁰ *Id.*

³¹ Common Sense Media AI Risk Assessment: Gemini K – 12, Jan. 9, 2026, available at <https://www.common sense media.org/sites/default/files/ai-ratings/csm-ai-risk-assessment-gemini-k-12-01092026.pdf>

³² *Id.*

³³ *Id.* at 8.

³⁴ See *supra* note 29.

³⁵ Gemini is a “Core Service” covered by the GWFE Terms of Service, see https://edu.google.com/intl/ALL_us/workspace-for-education/add-ons/google-workspace-with-gemini/

In sum, across YouTube, Chromebooks, the Chrome internet browser, and Gemini AI, the very same themes emerge: Google is not taking legal responsibility for harms to children resulting from its products. Instead, Google points the finger at others. In K.G.M.'s case, Google blamed the child and her family. In the Chromebook lawsuits, Google blames the school districts. Google is employing the same playbook for Gemini AI use in schools, as Google tries to solidify Gemini's competitive position while offloading the legal risks to the Districts. This is not OK.

II. Requests to Disable YouTube and Gemini AI on School-Issued Devices and to Investigate Risks Posed By Student Internet Use More Broadly

Putting this all together, the questions raised by recent litigation developments and media reports include the following:

- 1.) After the K.G.M. trial, in which a jury found that YouTube is dangerous or likely to be dangerous when used by a minor in a reasonably foreseeable manner, and awarded K.G.M. \$1.8 million for being harmed by YouTube, why are many Districts still allowing YouTube to be accessed on school-issued devices?
- 2.) Now that hundreds of the Districts, representing millions of students, have sued YouTube in the MDL litigation, admitting that YouTube is a dangerous and defectively designed product that addicts and harms their students, how can Districts possibly justify continuing to permit their students to use YouTube on school-issued devices?
- 3.) How many students in the Districts are becoming addicted to YouTube, including YouTube "Shorts," on school-issued devices, inside and outside of school hours?
- 4.) How many of these students are developing depression, anxiety, body dysmorphia, social withdrawal, self-harm behaviors, and suicidal ideation – like K.G.M. did?
- 5.) How many students in the Districts are currently being harmed by online content and Gemini AI content accessed on school-issued devices?
- 6.) How many families are going to file suit against YouTube, Google and/or the Districts after they discover their children were harmed by problematic use of YouTube, Gemini AI, or other online content on school-issued devices, which, in many families, is the student's primary internet access?

- 7.) If lawsuits are filed, is Google likely to point the finger at the Districts, as it has already done in the M.C. case, the Z.G. case, and in its public comments on these issues?
- 8.) If and when families sue the Districts, and/or Google points the finger at the Districts for harms to children caused by YouTube, Gemini AI, and other online content on school-issued devices, what action will the Districts be able to say they took to *protect* their students?
- 9.) Will the Districts have *failed to protect* their students from YouTube, Gemini AI, and online content accessed on school-issued devices—even after becoming aware of the harms they were causing?

Now that the Districts know of the dangers to students posed by YouTube, Gemini AI, and online content accessible on school-issued devices, the Districts need to take decisive actions to protect students. To that end, the Districts should do three things, right now.

First, the Districts should immediately shut off student YouTube access on District-issued devices.³⁶ Google itself effectively invited the Districts to do so in response to the public reporting cited above. Every harm to a student in the Districts caused by YouTube on a school-issued device from this day forward is inexcusable. Snap, TikTok, Instagram, and Facebook have no place in schools. Neither does YouTube.

Second, the Districts should immediately shut off Gemini AI access on District-issued devices. The *Common Sense Media* report on Gemini AI, cited above, disqualifies Gemini AI from being forced on millions of American students.

Third, the Districts should conduct a systematic review of student internet use on school-issued devices. As part of this investigation, the Districts should analyze the data on students' internet use, including:

- 1.) How long students are spending browsing the internet;
- 2.) How many websites students are browsing during and after school hours;

³⁶ To the extent that teachers insist on showing particular YouTube videos to students for their unique educational value, our clients are open to teachers' presenting particular, prescreened, appropriate educational videos to their classrooms. Even so, such videos must not contain advertisements, they must not be "Shorts," and they must not be algorithmically generated. Even if this limited use of YouTube by teachers were permitted, students should not be able to access YouTube directly on their school-issued device.

- 3.) How many tabs students are opening simultaneously and navigating between, especially on the Chrome browser;³⁷
- 4.) Whether students are accessing inappropriate content online;
- 5.) Whether there are indications that, like K.G.M., District students are becoming addicted and suffering mental-health injuries including depression, anxiety, body dysmorphia, social withdrawal, self-harm behaviors, and suicidal ideation related to their consumption of online content facilitated by their school-issued device.

The Districts should have the data necessary to conduct this analysis. If the Districts lack this data—which would be a problem in and of itself—the Districts should request the data from their technology providers, like Google, who surely maintain browsing histories for students while logged in on their school-issued accounts.

The Districts are funded by the public, the Districts educate the public, and the Districts are accountable to the public. The Districts should therefore inform the public about the steps the Districts will take to investigate these risks to students. When that investigation is complete, the Districts should disclose the full results to the public, and the changes they will make to their technology policies to protect students.

Conclusion

Children are being harmed. If the *status quo* persists, lawsuits are inevitable. Google has made clear it intends to point the finger at the Districts. The Districts should step in and take action to protect their students from YouTube and school-issued devices.

If the Districts fail to take the actions called for above, we are deeply concerned that students will continue to suffer grave harm from their use of YouTube, Gemini AI, and school-issued devices more broadly, the Districts will be dragged into litigation resulting from those harms, and the Districts' taxpayers will be left holding the bag. That is a completely unacceptable – and completely avoidable – outcome.

Only the Districts' leaders have the power to avoid that disastrous outcome. The Districts should act. The Districts should protect their students and taxpayers.

We greatly appreciate the Districts' attention to these matters.

Sincerely,

[REDACTED]

³⁷ As teachers can attest, students can rapidly switch between multiple open tabs on their Chrome browser, making it impossible for teachers to police student internet use in the classroom.