Oversight of Al Chatbots: Ensuring Products Developed by China's Largest Al and EdTech Companies are Safe and Age-Appropriate for Young People in the United States

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RECOMMENDED ACTIONS

The FTC should expand its <u>recent inquiry</u> under its 6(b) authority, by issuing orders to Shanghai-headquartered MiniMax and Beijing-headquartered Zuoyebang to gain insight into the companies' practices regarding their Al companion chatbot products, Talkie and PolyBuzz, given that they market to, and transact with, young people in the United States—and directly compete with the likes of Character.Al and Chai.

Congress should expand oversight efforts—such as US Senator Josh Hawley's <u>recent investigative actions</u> as Chair of the Senate Judiciary Subcommittee on Crime and Counterterrorism—to ensure that China's leading AI and EdTech companies responsible for Talkie and PolyBuzz are held to the same standards as their US-headquartered counterparts, and to prevent further harm across this emerging consumer product category, regardless of where these products are developed.

BACKGROUND

Two of China's leading AI and EdTech companies—<u>MiniMax</u> (\$4B valuation) and <u>Zuoyebang</u> (\$10B valuation)—are responsible for <u>Talkie [MSJ]</u> and <u>PolyBuzz</u>—two popular, yet <u>similarly</u> <u>concerning</u>, AI chatbot products rivaling Character.AI and Chai in US app stores [Apple, Google].

Notably, some of China's largest tech firms (e.g. Tencent, Alibaba), are counted as investors [MinMax. Zuoyebang], while China's State-owned Assets Supervision and Administration Commission (the entity responsible for managing state-owned enterprises) recently became a shareholder in MiniMax.

Thus far, neither PolyBuzz nor Talkie* have been named in any legal complaints or government action in the US, and it is unclear whether there have been instances of harm following similar fact patterns as those found in cases against Character.Al^{[Garcia,} A.E.] or OpenAl^[Raine], or in related oversight of major Al chatbot developers. However, reporting^[WaPo: (1), (2), CT Insider], community forums (e.g. Reddit^[PolyBuzz, Talkie], Discord^[PolyBuzz, Talkie]), and basic testing show that these apps share similar risk profiles, while safeguards remain inadequate.

Last Tuesday's Senate Judiciary subcommittee hearing** rightly focused on US-based AI chatbot developers that have been subject to recent litigation and government action at the state and federal levels. But any welcome changes to these companies' products may result in young users flocking to less restrictive alternatives such as Talkie and PolyBuzz. Therefore, it is

critical that these apps' developers, and their Chinese parent companies—MiniMax and Zuoyebang—are included in federal oversight efforts, so that they, too, take steps to evolve their safety practices while US lawmaking and litigation proceed at the state and federal level. This can help accelerate efforts to ensure that these products are age-appropriate, built with safety by design, and compete on an even playing field with their US-headquartered counterparts.

*Talkie has not been named in any complaints, but coincidentally, Disney et al. recently filed a complaint against Talkie's parent company, MiniMax, alleging that its Hailuo AI image/video generation service was trained on IP stolen from various Hollywood studios. I have no knowledge of whether there are any efforts to examine PolyBuzz, but I wouldn't be surprised to see a similar case against Zuoyebang given that in my testing, there were official in-app announcements and promotions such as "Screen Legends (3rd Edition): Marvel Universe" which included Marvel characters—depicting Captain America and Iron Man, referencing Spider-Man and Loki, and suggesting a storyline set in Black Panther's Wakanda—while encouraging users to design characters, and crucially, upload or generate images of their characters. A small consent checkbox and liability disclaimer at the bottom of the screen read: "I confirm my Character does not infringe on the image, intellectual property, or any other rights." It is unclear whether this was a partnership between Marvel and PolyBuzz, or if PolyBuzz took liberties with Marvel's intellectual property.

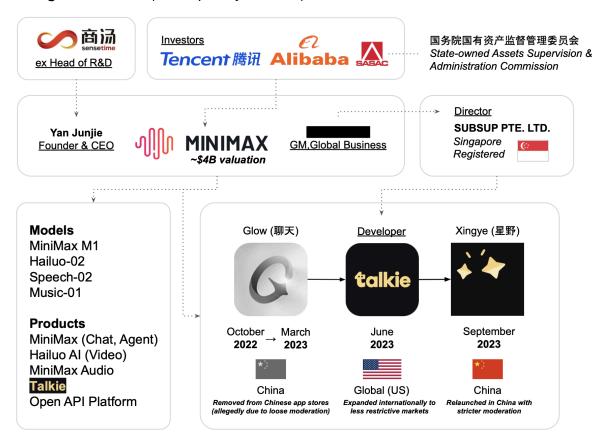
**Last Tuesday, I attended the Senate Judiciary Subcommittee hearing titled "Examining the Harm of AI Chatbots", seated as a member of the public just a few rows behind the families of two teenage victims who'd taken their own lives after products developed by OpenAI and Character.AI failed to fully disengage from conversations involving self harm and suicidal ideation. Beyond the parents' powerful testimony of lives cut short, we heard that Character.AI chatbots engaged their kids in sexually explicit and abusive conduct—while Senators and expert witnesses reminded the public of recent reporting that showed Meta's AI chatbots had been programmed to allow for sensual and romantic engagement with minors.

This past February, I sat in the same room for a full committee hearing, that time staffing as a congressional fellow while seated behind US Senator Alex Padilla at the dais as he drew attention to the risks posed by character-based AI chatbot apps—describing how these platforms had been flooded with age-inappropriate chatbots, and highlighting that at least two individuals had died by suicide following extensive conversations with AI chatbots. He asked one of the witnesses, the father of a teenage boy who'd taken his own life as a result of digitally-mediated exploitation—a sextortion scam initiated through Instagram—how he would recommend the Committee begin to think through the challenges posed by this emerging consumer product category. The Senator later sent oversight letters to the CEOs of three AI chatbot app developers, pressing them to ensure their products do not contribute to self-harm or suicide.

In 2022, the same year that the witness lost his son, my own brother fell victim to a similar sextortion scheme through Instagram. We were lucky—my brother is still with us today. But for many victims, the crippling weight of shame can make it feel like there is no way out. Blindsided, families are left grieving, wondering why this happened to them, and what could have been done to prevent it. My hope is that the recommendations I provide here, along with what I learned from my time as a fellow, serve as a small contribution as part of the broader coalition of parents seeking change from those with the power to act.

The views expressed in this brief are my own opinion, not those of any current or former employer.

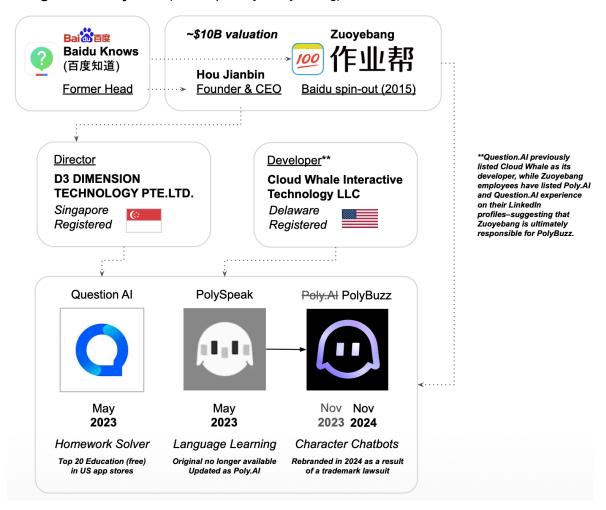
Background: Talkie (developed by MiniMax)



- **Talkie** (or **Talkie Lab**) is a GenAl-powered character- and persona-based Al chatbot web/mobile app similar to Character.Al and Chai.
- The app is developed by MiniMax—a Shanghai-based, Alibaba- and Tencent-backed Al firm valued at \$4B, founded and helmed by CEO Yan Junjie, a former SenseTime exec. MiniMax is also state-backed by SASAC as of its most recent funding round.
- Talkie's predecessor Glow was removed from Chinese app stores in March 2023, <u>allegedly</u> for its loosely moderated user interactions (including sexually explicit content).
- MiniMax quickly shifted to markets with less stringent regulation, launching Talkie via US app stores in June 2023 through the developer, SUBSUP PTE. LTD, a Singapore entity.
- Talkie is rated for 18+ (previously 17+) in the Apple App Store, and <u>13+ in the Google</u>
 Play Store.
- It is unlikely that the app leverages age estimation technology—users without an account can easily bypass weak age-gating, and readily access age-inappropriate content.

- Talkie's chatbots often steer conversations into age-inappropriate territory with violent themes or sexual imagery—Al-generated character selfie/photo messages are sent to users who can view them for a fee (in-app purchase).
- It is unclear how the AI models used by Talkie are trained to respond to topics relating to themes regarding mental health—such as self-harm or suicide (or how easy it is for a user to bypass any safeguards, if they exist).
- 07.27.2024 One of America's Hottest Entertainment Apps Is Chinese-Owned (WSJ)
- 10.29.2024 China's Al Boyfriends (ChinaTalk)
- 01.20.2025 Interview with CEO of MiniMax (Recode China AI)
- 07.16.2025 Alibaba-Backed Chinese Al Startup Files for Hong Kong IPO (WSJ)
- 07.30.2025 <u>Meet MiniMax: The Chinese Tech Company Touted by Jensen Huang That's Headed for an IPO</u> (Asia Tech Lens)

Background: PolyBuzz (developed by Zuoyebang)



- **PolyBuzz** (formerly **Poly AI**; formerly **PolySpeak**) is a GenAl-powered character- and persona-based AI chatbot web/mobile app similar to Character.AI and Chai.
- The app is developed by Zuoyebang—a Beijing-based, Alibaba-backed, Baidu-incubated spin-out turned EdTech giant valued at \$10B and helmed by CEO Hou Jianbin—which also develops Question.Al (Top 20 in Education [free] in the App Store).
 - PolyBuzz is distributed through US app stores through the developer CLOUD WHALE INTERACTIVE TECHNOLOGY LLC-a Delaware entity also previously listed as the developer of Question.Al (which now lists its developer as D3 DIMENSION TECHNOLOGY PTE. LTD-a Singapore entity).
 - Various LinkedIn users with experience at Zuoyebang note their contributions to Poly AI and Question.AI, reaffirming the subsidiary structure.

- PolyBuzz is rated for 18+ (previously 17+) in the Apple App Store, and <u>13+ in the</u> <u>Google Play Store</u>.
- It is unlikely that the app leverages age estimation technology—users without an account can easily bypass weak age-gating, and readily access age-inappropriate content.
 - PolyBuzz chatbots often steer conversations into age-inappropriate territory with violent themes or sexual imagery—users may purchase credits (in-app purchase) to view live photos (hyperrealistic [sexual/suggestive] synthetic scenes on loop).
 - It is unclear how the AI models used by PolyBuzz are trained to respond to topics relating to themes regarding mental health—such as self-harm or suicide (or how easy it is for a user to bypass any safeguards, if they exist).
- [date unclear] <u>Big education company "does not do its job"</u> (iNEWS; focuses on expansion in Brazil, but provides thoughtful analysis of the product ecosystem)
- 05.17.2024 Zuoyebang is rumored to be IPOing again (Gelonghui)
- 12.06.2024 Al friendships claim to cure loneliness. Some are ending in suicide. (WaPo)
- 05.08.2025 Connecticut students are dating AI (CT Insider)

Data & Insights

Analysis from a16z and Sensor Tower show that PolyBuzz and Talkie have over time jockeyed for popularity and even rivaled US competitors (e.g. Character.AI, Chai, etc).

- Sensor Tower State of Al Apps Report 2025
 Press | Interactive Report | PDF
- Sensor Tower Top Free Entertainment Apps: Last 90 Days Google (US) | Apple (US)
- Andreessen Horowitz (a16z) Top 100 GenAl Consumer Apps

03.13.2024 - 2nd Edition

08.21.2024 - 3rd Edition

03.06.2025 - 4th Edition

08.27.2025 - 5th Edition

According to Sensor Tower's State of Al Apps Report 2025, the install base for PolyBuzz strongly overlaps with users of Roblox, Snapchat, TikTok–apps predominantly used by young people.

Recently, Talkie has fallen in rank on iOS, while PolyBuzz remains competitive with Character.Al and Chai. All of the apps remain competitive on Android.

