

MIKOŁAJ JĘDRZEJCZAK

Adam Mickiewicz University, Poznań, Poland
<https://orcid.org/0009-0004-9764-0916>
mikjed5@st.amu.edu.pl

Leading a Minor Under the Age of 15 to Engage in Any Other Sexual Activity in Cyberspace

Abstract: The article aims to define, through formal and dogmatic analysis, the scope of Article 200 § 1 of the Polish Criminal Code, which penalizes leading a minor under 15 to other sexual activity in the context of cyberspace. It emphasizes that committing this crime does not require physical presence and that cyberspace poses challenges in interpreting legal norms expressed through phrases and terminology typical of physical interaction. The article also addresses the victim's volitional and intellectual aspects. The conclusion presents a broad understanding of "leads to any other sexual activity", finding its application to the cyberspace. The subject of the article should be considered important in connection with the dynamic development of new technologies and increased Internet activity of minors.

Keywords: sexual freedom, cyberspace, criminal protection of a minor, limits of criminal liability

Introduction

Contemporary regulations included in the Polish Penal Code¹ provides protection for minors in the field of sexual freedom, reflection of which is Art. 200 § 1 of the p.c., which criminalizes the sexual abuse of a minor under the age of 15. The elements of this crime are fulfilled by a person who has sexual intercourse with a minor under the age of 15 or commits any other sexual act against such a person or leads them to undergo or perform such activities.² The cited provision, through the scope of the aforementioned elements of commission acts, is applicable in a wide range of factual situations. Moreover, the application of this provision takes on particular importance in connection with the dynamic development of new digital technologies and increased Internet activity of minors, who are particularly vulnerable to sexual abuse by offender. The combination of a wide spectrum of behaviours penalized by the norm with the prevalence of paedophilic behaviour in the digital space encounters interpretation problems in the scope of the objective and subjective side of the prohibited act. Although some of the above-mentioned elements of commission activities (i.e. "sexual intercourse" or "any other sexual activity") refer *stricto* to hand-held behaviour, the designation of which is physical contact in the real world, so the element "leads" does not determine the need for the offender to

¹ Ustawa z dnia 6 czerwca 1997 r.—Kodeks karny (consolidated text Journal of Laws of 2025, item 383), hereinafter: p.c.

² Lech Gardocki, *Prawo karne* (Wydawnictwo C.H. Beck, 2023), 287.

participate in the behaviour undertaken by the minor.³ It is therefore a matter of penalizing a situation in which a minor under the age of 15 is involved in a sexual activity that does not involve physical contact with the person or persons committing that activity.⁴

The research objective of this article is to define, through the formal and dogmatic analysis, the scope of application of the legal norm contained in Art. 200 § 1 of the Criminal Code, focused on the interpretation of the element of commission act “leads to ... any other sexual activity” in the context of committing such actions in the digital space to a minor under the age of 15. The problem of the offender’s contact with the victim and offender’s existence or non-existence in the material world will be analysed in relation to the implementation of conditions fulfilling the elements of a commission act through information system, including the characteristics of cyberspace as a place of leading to any other sexual activity with a minor and its impact on the volitional and intellectual aspect of a minor under the age of 15 in the context of the aforementioned crime.

Therefore, the considerations will concern only one of several commission acts that violate the sexual freedom of the minor, provided for by the legislator. The scope of the research will focus only on the form of offender, not including the offense of electronic sexual corruption of a minor related to the crime in question, regulated in Art. 200a of the p.c., which constitutes a *sui generis* offense of attempting to sexually abuse a minor. Narrowing the research field will allow the existence or non-existence of a construction gap in relation to paedophilic behaviour to be demonstrated. This problem is particularly important in connection with the dynamic development of new digital technologies and increased Internet activity of minors, who are particularly vulnerable to sexual abuse by offender.

1. Leading to Any Other Sexual Activity as an Act of Committing a Prohibited Act in the Context of Cyberspace

The history of crimes against sexual freedom and the relatively short period of popularity of online communicators enabling audiovisual contact raise doubts as to the possibility of leading a minor to another sexual activity in cyberspace. It is clear in relation to the cited feature of commission action that it is possible to lead a minor under the age of 15 to sexual intercourse or to undergo another sexual ac-

³ Jarosław Warylewski and Katarzyna Nazar, “Commentary on Article 200,” in *Kodeks karny: Komentarz*, ed. Ryszard Andrzej Stefański (Wydawnictwo C.H. Beck, 2023), 1404.

⁴ Marek Bielski, “Commentary on Article 200,” in *Kodeks karny. Część szczególna. Tom II. Część I. Komentarz do art. 117–211a*, ed. Włodzimierz Wróbel and Andrzej Zoll (LEX/el., 2018).

tivity or to perform such an activity by violence, threat or deception, and it is even sufficient to use low-intensity forms of violence.⁵ However, it should be determined whether the induction of any other sexual activity is carried out not only without physical coercion on the part of the offender, but also whether it can take place only through social communicators (which are a form of information system), without prior psychophysical contact outside cyberspace.

“Any other sexual activity” may consist not only of the physical but also of the intellectual involvement of the victim, when it is objectively sexual in nature, which, however, does not fall within the concept of “sexual intercourse”.⁶ It occurs, for example, when the offender leads the victim to observe the masturbating person.⁷ Despite the fact that the term in question does not have a legal definition, the scope of its application is wide enough to apply to a number of behaviours characterized by passive participation in a given sexual activity, or even the exclusive performance of such an activity by him, without the participation of the offender. Of course, it is possible to lead to a sexual act using physical coercion (for example, committing this offence in connection with bringing a minor to a sexual act with a third party, using physical force to perform sexual contact), but the phrase “any other sexual activity” is not an accessory to the physical contact of the offender with the victim. This, such an activity can also find its application by exploiting the inability to properly understand reality by a minor, by blackmail or threat manifested only in speech. However, it is not required that the offender performs a physical act. Moreover, this does not apply to the presence of the offender, which would condition the commission of the crime.

Leading to any other sexual activity is used in isolation from material reality also due to the above-mentioned phrase “leads”, which with its universal meaning also goes beyond the traditional, physical framework of the offender’s behaviour towards the victim. Use in Art. 200 § 1 of the p.c. of this word opens the way to the recognition that the offender of this act may be a person acting via the Internet—leading the minor via the Internet to the behaviours indicated in Art. 200 § 1 of the p.c.⁸ The key aspect, apart from the lack of the need for the offender’s personal action in committing such an action, is the recognition of current social messengers as a space that can be qualified as a place for committing a crime. It must condition the existence of a causal relationship between the offender’s committing a specific behaviour (which is not material contact) and the occurrence of an act with a minor

⁵ Błażej Kolański and Dorota Korecka, “Przestępstwa pedofilskie w Kodeksie karnym,” *Prokurator* 18, no. 2 (2004): 31.

⁶ Jarosław Warylewski, “Glosa do uchwały SN z dnia 19 maja 1999 r., I KZP 17/99,” *Orzecznictwo Sądów Polskich*, no. 12 (1999): 224.

⁷ Warylewski, “Glosa do uchwały SN z dnia 19 maja 1999 r., I KZP 17/99,” 224.

⁸ Barbara Kunicka-Michalska, “Pornografia i wykorzystywanie nieletnich w Internecie: Regulacje polskiego kodeksu karnego,” *Studia Prawnicze* 166, no. 4 (2005): 77, <https://doi.org/10.37232/sp.2005.4.4>.

under the age of 15, which can be considered a sexual act. It should be noted that leading to any other sexual activity, unlike other cases conditioned by commission activities under Art. 201 § 1 of the p.c., is a material crime. In the analysed case, the effect required by law is to lead a minor under the age of 15 by the offender to undergo a sexual act.⁹ The basis for criminal liability may be the undertaking of behaviour that should be objectively considered as the reason for a minor under 15 years of age to undergo a given type of sexual activity.¹⁰

Modern technologies make it possible not only to send text messages, the content of which may encourage minors to perform sexual activities (e.g. masturbation), but also to transmit sound and image by sending videos or conducting live broadcasts. The use of such measures thus makes it possible to present pornographic content or distribute it in a way that allows the minor to become acquainted with it.¹¹ Therefore, in view of the cited facts, it should be stated that if a social communicator (being a form of an information system) is able to be a place constituting a designate for the presentation of paedophilic content, it is also a place allowing for the delivery of a statement the content of which leads the minor to perform any other sexual activity, which in turn is a designate of the behaviour penalized by the analysed norm. This usually involves the recording and delivery via an audiovisual system or network of another sexual activity that the offender is familiar with. However, it is reasonable to specify that such a recording does not necessarily always need to be sent. After all, executive action has been described in this case as any form of physical or mental influence leading to sexual activity involving a minor under the age of 15.¹² However, such a case is far from reality, because in the situation of its occurrence the offender would not be entitled to emotional satisfaction related to the criminological background and purposefulness of the crime in question. Nevertheless, it should be stated that the very action in the online sphere culminates in another sexual activity involving a minor, without the offender becoming acquainted with it in the sensual aspect, would be applicable to this norm. However, this involves significant procedural difficulties in evidence, which are not the subject of the discussion undertaken here.

Therefore, it should be assumed that due to the linguistic interpretation contained in the legal norm of phrases, it is clearly possible to commit the offence of bringing a minor under the age of 15 to any other sexual activity in cyberspace. This is not only due to the lack of any need for the physical aspect of the offender in relation to the victim of this element, but also due to the nature of the social messenger, which is a place allowing for such sexual activity to be implemented in

⁹ Warylewski and Nazar, "Commentary on Article 200."

¹⁰ Bielski, "Commentary on Article 200."

¹¹ Maciej Siwicki, "Ochrona małoletniego przed konfrontacją z treściami pornograficznymi," *Państwo i Prawo* 790, no. 12 (2011): 76.

¹² Bielski, "Commentary on Article 200."

cyberspace. Behaviour is the only case of direct use of a minor, of those behaviours contained in Art. 200 § 1 of the p.c., which is possible to implement in cyberspace as a place of crime. This conclusion is particularly important because it establishes the possibility of subsuming a significant number of facts whose place of commission of the crime is cyberspace to Art. 200 § 1 of the p.c., and clarifying the norm contained therein. This is associated with a more severe criminal penalty than in the case of presenting content of a paedophilic nature to a minor or a wide range of activities aimed at committing the crime in question, which was established in Art. 200a of the p.c., where the information system or network plays a special role.

The application of such a broad scope of the impact of criminal law protection should be deemed justified. Paedophilic behaviour is increasingly taking place in cyberspace, which is related to the obvious spread of new technologies in everyday life, including the life of minors under the age of 15. Taking into account the axiological basis of the functioning of the norm and the damage to the mental development of the victim led to any other sexual activity that may affect future mental conditions, no change in the interpretation of the article's wording should be postulated. By their linguistic meaning, even in their colloquial use, phrases clearly emphasize the diverse behaviours that can be classified to them. Therefore, it should be concluded that applying them also to cyberspace does not violate the principle of *nullum crimen sine lege certa*.

2. The Importance of Cyberspace as a Place of Crime

It is justified to consider how cyberspace as a place of committing a crime affects the occurrence and definition of some objective elements of a prohibited act, in the context of the element "leads to any other sexual act" and what its characteristics are. However, it should be clearly stated that where cyberspace is the place of committing the crime of leading to any other sexual activity with a minor under 15 years of age it is difficult, though not impossible, to find objective elements of the crime.

Problems start with the very attempt to properly apply the phrase "cyberspace" in terms of definition. This phrase has a legal definition, although this is not the same as other similar phrases, such as "digital space" or the Internet. The legal literature lacks a uniform interpretation, the result of which would be the commonly used *definiens* of these two other phrases, especially "digital space". This undoubtedly results from the requirements that are associated with such a challenge, not only in the field of knowledge about the law, but also in the field of technical knowledge about new technologies.

In relation to the analysed phenomenon, the most relevant would be the use of the concept of "cyberspace". Despite its most common occurrence in relation to the threat to the state's IT security, this expression is associated with phrases more

firmly established in the law by having a legal definition. It is also often invoked in the context of prohibited acts. Cyberspace under Polish law is understood as a space for processing and exchange of information created by information systems, referred to in Art. 3 point 17 of the Act of 17 February 2005 on computerization of the activities of entities performing public tasks,¹³ along with links between them and relations with users.¹⁴ An informatic system is a set of IT equipment and software, providing processing and storage, as well as the functionality to send and receive data through telecommunications networks using a terminal device appropriate for the type of network, commonly called the Internet.¹⁵ This suggests that such a system concerns a wider scope than a telecommunications network, which does not have to be based on an Internet connection, as exemplified by a telephone call or sending SMS messages. These methods of communication are based on a narrower range of technical solutions. The doctrine presents sentences specifying the area using the phrase “cyberspace”. This is a kind of communication space created by the system of Internet connections.¹⁶ Cyberspace equally includes the Internet, telecommunications networks or computer systems, and therefore all IT systems included in the global network.¹⁷ The connection with the global aspect is connected with a separate issue of determining the place in which a crime is committed in connection with such systems.

An analysis of the very legitimacy of the use of the phrase “cyberspace” encounters a multiplicity of related specialist phrases, but it outlines the framework for the further part of discussion regarding bringing a minor under the age of 15 to any other sexual activity. Due to the fact that this phenomenon constitutes a material crime, there must also be a result, as already established earlier. The lack of objective predictability of a criminal result in a given factual situation excludes the possibility of behaving in accordance with the rules of conduct, and therefore excludes the recognition of such behaviour as an object to the application of the norm.¹⁸ Moreover, the result as a state separated from the behaviour of the offender should lie “outside” this behaviour.¹⁹ In the absence of a tangible change in the external world included in the type of prohibited act, the result will also not indicate the direction

¹³ Consolidated text Journal of Laws of 2024, item 1557 as amended.

¹⁴ Ustawa z dnia 29 sierpnia 2002 r. o stanie wojennym oraz o kompetencjach Naczelnego Dowódcy Sił Zbrojnych i zasadach jego podległości konstytucyjnym organom Rzeczypospolitej Polskiej (consolidated text Journal of Laws of 2025, item 504).

¹⁵ Ustawa z dnia 18 lipca 2002 r. o świadczeniu usług drogą elektroniczną (consolidated text Journal of Laws of 2024, item 1513).

¹⁶ Katarzyna Chałubińska-Jentkiewicz, “Cyberbezpieczeństwo—zagadnienia definicyjne,” *Cybersecurity and Law* 2, no. 2 (2019): 6, <https://doi.org/10.35467/cal/133828>.

¹⁷ Cezary Banasiński, “Pojęcie cyberprzestrzeni,” in *Cyberbezpieczeństwo: Zarys wykładu*, ed. Cezary Banasiński (Wolters Kluwer, 2023), 23–27.

¹⁸ Judgment of the Supreme Court of the Republic of Poland of October 12, 2016, V KK 153/16, LEX no. 2151447.

¹⁹ Elżbieta Hryniewicz, “Skutek w prawie karnym,” *Prokuratura i Prawo*, no. 7–8 (2013): 118.

of the offender's behaviour in the type of prohibited act.²⁰ It is crucial to find a rationalization for recognizing cyberspace as a place where the offender's behaviour or a perceived change in the external world takes place in order to determine the elements of the objective matter, which is a structural element of this prohibited act.

A prohibited act is deemed to have occurred at the place where the offender acts or fails to perform an action that the offender is obliged to perform, or where the results of the prohibited act take place, or are intended by the offender to take place. The activity of the offender in cyberspace is not controversial, as activities that are related to bringing a minor to any other sexual activity and are noticeable in the communication space constituting it are behaviours that allow the offender to be blamed for a prohibited act. Therefore, activities using devices connected to the communication space (including the formulation of threats or suggestive statements) allow for their recognition as activities in the digital space, which implies this can be classified as the place of the crime. It is more difficult to determine the existence of a result. The material environment of a minor performing another sexual activity can be clearly defined as the place of the result: it will always be the place where the crime is committed. However, it seems more ambiguous to recognise cyberspace as the place of the result. This is due to the fact that there may be a situation in which the minor does not prepare an audiovisual form, such as a photo or recording. As a result, the action will not leave any trace in cyberspace. Therefore, one would be inclined to reflect that cyberspace will be the place where the results takes place, but only if there is a trace in the information system of the minor person subjected to such sexual activity. In the strict sense of the word, we call a perceptible system of things or a phenomenon caused by someone due to the fact that some form of expression established or customarily shaped rules dictate that thoughts of a specific type must be associated with this system.²¹ The signs in this case will be any activities that can be considered objectively sexual, which have been recorded on a data carrier in an information system that can be sensually recognized (usually visual).

The heterogeneity and complexity of cyberspace as a place where a crime is committed renders it difficult to deconstruct some objective elements of a prohibited act. However, it is possible, following a logical and linguistic analysis, to consider this phenomenon as the place where the crime was committed. This is due to the possibility of taking action in it by the offender of the prohibited act and the conditional occurrence of the result of leading to another sexual act in it. It is also important to emphasize the nature of technical devices or messages sent through them as tools for committing a crime. This allows for a more complete deconstruction of the crime and the separation of cyberspace as a broader phenomenon with elements constituting it as a place, not a tool. Recognising cyberspace as a place

²⁰ Hryniewicz, "Skutek w prawie karnym," 118.

²¹ Zygmunt Ziemiński, *Logika praktyczna* (Wydawnictwo Naukowe PWN, 2014), 14.

of crime should be considered justified. Due to the increasing role of information technology in interactions between offenders and victims of crimes against sexual freedom, elements related to cyberspace must be integral to the site of the crime. However, the same extent is associated with the considerable diversity of phenomena on technical grounds, which, due to having different characteristics and scopes of application, lack legal definitions. This makes it difficult to properly apply the law on the basis of diverse facts related to modern technologies. Therefore, it should be postulated to create definitions that are legal under national law, such as “digital space” or “Internet”, because the jurisprudence applies these phrases instrumentally *in concreto*, without outlining a universal *definiens*.

3. The Impact of Cyberspace on the Volitional and Intellectual Aspect of the Victim

An offence under paragraph 200 § 1 of the p.c. may be committed only intentionally, whereas it is generally assumed that the form of intention may be direct intention or quasi-eventual intention.²² In the case of the volitional and intellectual aspect of the offender, cyberspace does not play a significant role, because the said intention is born in him, even before his contact with cyberspace, and is made visible by the actions taken during the attempt to commit the act. In the case of a proposal regarding sexual intercourse, submission to or performance of any other sexual act, the actions taken by the offender in the phase of aiming to implement the proposal should differ from the mere contact with the victim as part of the process of submitting a sexual proposal to them, and clearly bring the offender closer to its implementation in analogue reality.²³ Intellectual abilities and the volitional aspect are also relevant in the context of the victim. The element “leads” assumes the existence of a causal relationship between the offender’s act and the undertaking of specific behaviours by a minor, but it is important that the offender in this system is the active party, and without his initiative, the act would not have taken place.²⁴ To clarify, the legislator in Art. 200 § 1 of the p.c. using the concept of “leads” to the exclusion of activities in which the offender does not himself lead the minor to sexual activity, and participates in it as a result of the minor’s behaviour.²⁵ This raises the question of whether, and if so, how cyberspace affects the volitional and intellectual aspect of a minor under the age of 15 in the context of the prohibited act

²² Warylewski and Nazar, “Commentary on Article 200.”

²³ Mikołaj Małecki, “Fazy groomingu: Glosa do postanowienia SN z dnia 17 marca 2016 r., IV KK 380/15,” *Przegląd Sądowy* 27, no. 1 (2018): 112–13.

²⁴ Kolasiński and Korecka, “Przestępstwa pedofilskie w Kodeksie karnym,” 31.

²⁵ Judgement of the Supreme Court of the Republic of Poland of May 16, 2008, I KK 338/07, LEX no. 435275.

under analysis. Special clarification is required in the case of a minor performing any other sexual activity, without external pressure or maturity, which could be classified as *vis compulsiva*.

A minor performing any other sexual activity in cyberspace does not have to experience external coercion to perform it. It is true that cyberspace is a place where blackmail or the threat can occur, which obviously violates the free will of the victim. However, the prohibited act might only be carried out through suggestive statements that would encourage, but not force, sexual activities such as touching in intimate places or masturbation. However, the standard will not apply at all if the minor fully independently takes the aforementioned initiative to perform such an activity. However, this will only happen if the minor's will is not violated by any actions of the offender, even allowing the minor to take such an initiative in cyberspace or in the physical world. Because the offender who actively proposes tangible benefits in exchange for certain conduct, provides transport, makes the premises available, facilitates playing on the computer, or shows activity aimed at obtaining the intended and should be added non-contradictory result with the will of minors in the form of either sexual intercourse or undergoing any other sexual activity, thereby realizes the element of "leads".²⁶ All these situations, which modify or do not affect the will of the minor, can take place both in cyberspace and in the material world. This leads to the reflection that cyberspace does not have any extraordinary impact on the volitional aspect of the victim.

A precisely different situation takes place in the context of cognitive abilities, related to the intellectual aspect, in the case of a victim of such a crime. Cyberspace may impact the awareness of the minor as to the form of the offender. Using online platforms or communicators operating in the ICT system, the offender has the opportunity to create a false identity. This may take the form of aspects such as communicating with a minor in cyberspace, impersonating a person close in age to the victim, or creating in them a belief that a paedophile situation does not exist. In the present case, even with the implementation of an exclusive initiative on the part of a minor, there is no situation excluding the application of the norm, by creating a false image of reality through deception, which should be treated not only as an active action that aimed at committing a crime, but also the exploitation of the victim's inability to properly perceive reality, which is based on ongoing intellectual development. This will be of particular importance where there is a small age difference, which would prejudice the existence of a crime, an example of which would be the commission of such a prohibited act by a minor who was only 17 years of age.

The conclusions lead to an unambiguous reflection that despite the lack of any impact of cyberspace on the volitional aspect of minors in the offence of leading to any other sexual activity, it is important for their cognitive functions and awareness

²⁶ Judgement of the Supreme Court of the Republic of Poland of May 16, 2008, I KK 338/07.

of the implementation of the prohibited act by the offender. Modern technologies, by misleading, can easily lead to interference in the intellectual sphere of a minor under the age of 15.

Summary

The linguistic interpretation contained in the legal standard under Art. 200 § 1 of the p.c. of the phrases “punishing”, or “bringing a minor under the age of 15 to any other sexual activity” clearly indicates the possibility of committing a crime in cyberspace. This is due not only to the lack of a need for the offender’s physicality in relation to the victim, but also to the communicator, which is a form of an information system that can be treated as an element allowing for their implementation. The heterogeneity and complexity of cyberspace as a place where a crime is committed makes it difficult to deconstruct some objective elements of the prohibited act. However, it is possible, following a logical and linguistic analysis, to consider this as the place where the crime was committed. This is due to the possibility of taking action in cyberspace by the offender of the prohibited act and the conditional occurrence of the result of leading to any other sexual act in it. The diversity and high technical knowledge needed to properly classify new technologies makes it reasonable to consider creating new legal definitions outlining the semantic framework of phrases related to these technologies, allowing for their potentially more effective use in order to effect more precise and effective protection of goods by criminal law standards. Cyberspace itself may constitute an element affecting the intellectual sphere of a minor who, by not believing that a situation might involve a paedophile element, may demonstrate an initiative to perform an act of a sexual nature. This illustrates the complexity of the problem of bringing a minor under the age of 15 to any other sexual activity in cyberspace. Undoubtedly, although it does not make it impossible, it has a significant impact on the effectiveness of deconstructing the objective elements of the crime and on the minor himself in the analysed case, blurring the clear boundaries of criminal liability.

BIBLIOGRAPHY

- Banasiński, Cezary. “Pojęcie cyberprzestrzeni.” In *Cyberbezpieczeństwo: Zarys wykładu*, edited by Cezary Banasiński. Wolters Kulwer, 2023.
- Bielski, Marek. “Commentary on Article 200.” In *Kodeks karny. Część szczególna. Tom II. Część I. Komentarz do art. 117–211a*, edited by Włodzimierz Wróbel and Andrzej Zoll. LEX/el., 2018.
- Chałubińska-Jentkiewicz, Katarzyna. “Cyberbezpieczeństwo—zagadnienia definicyjne.” *Cybersecurity and Law* 2, no. 2(2019): 7–23. <https://doi.org/10.35467/cal/133828>.
- Gardocki, Lech. *Prawo karne*. Wydawnictwo C.H. Beck, 2023.

- Hryniewicz, Elżbieta. "Skutek w prawie karnym." *Prokuratura i Prawo*, no. 7–8 (2013): 106–26.
- Kolasiński, Błażej, and Dorota Korecka. "Przestępstwa pedofilskie w Kodeksie karnym." *Prokurator* 18, no. 2 (2004): 22–43.
- Kunicka-Michalska, Barbara. "Pornografia i wykorzystywanie nieletnich w Internecie: Regulacje polskiego kodeksu karnego." *Studia Prawnicze* 166, no. 4 (2005): 77–108. <https://doi.org/10.37232/sp.2005.4.4>.
- Małecki, Mikołaj. "Fazy groomingu: Glosa do postanowienia SN z dnia 17 marca 2016 r., IV KK 380/15." *Przegląd Sądowy* 27, no. 1 (2018): 107–15.
- Siwicki, Maciej. "Ochrona małoletniego przed konfrontacją z treściami pornograficznymi." *Państwo i Prawo* 790, no. 12 (2011): 68–79.
- Warylewski, Jarosław. "Glosa do uchwały SN z dnia 19 maja 1999 r., I KZP 17/99." *Orzecznictwo Sądów Polskich*, no. 12 (1999): 224.
- Warylewski, Jarosław, and Katarzyna Nazar. "Commentary on Article 200." In *Kodeks karny: Komentarz*, edited by Ryszard Andrzej Stefański. Wydawnictwo C.H. Beck, 2023.
- Ziemiński, Zygmunt. *Logika praktyczna*. Wydawnictwo Naukowe PWN, 2014.