

Rules for Determining "Public" Circumstances in Crimes Related to the Harm of Children's Physical and Mental Health and Their Judicial Application

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Abstract. The determination of "public" in crimes related to the harm of children's physical and mental health varies in severity, affecting the consistency and continuity of judicial standards. Through legal hermeneutics analysis, this paper proposes a determination rule based on the "functional substance theory" and centered on "perceived possibility." The scope is expanded from physical to virtual, recognizing that live online broadcasts watched by multiple people in real time qualify as "public," while recorded broadcasts do not; temporary closure of public places, resulting in the loss of the possibility of perception by unspecified individuals, does not constitute "public." A determination path based on three dimensions—"degree of openness," "people density," and "visibility of behavior"—is constructed to define the "openness and unspecified nature" of public places. This provides support for the rule of law process of proportionality between crime and punishment and offers guidance for resolving the dilemma of lenient sentencing and the disregard for aggravating circumstances.

Keywords: Child molestation, Public Places, Protection of Minors, Application of Criminal Law.

1. Introduction

In recent years, cases involving harm to children's physical and mental health have increased rapidly, and such cases account for a high proportion of the number of prosecutions brought by the procuratorate for crimes against minors. In 2024, crimes related to harm to children's physical and mental health still ranked second in the number of prosecutions brought by the procuratorate for crimes against minors, with a total of 11,650 people prosecuted, accounting for 15.6% of the total number of prosecutions for crimes against minors.

"Two Laws" Since their revision, the obligations of all parties to protect minors have been clarified, marking that the state has achieved early prevention and regulation of perpetrators of illegal violence from a legislative perspective. After the revision of crimes related to harm to children's physical and mental health in the 2021 Amendment to the Criminal Law (XI), it was clearly stated that "committing acts that harm children's physical and mental health in public places, with egregious circumstances" was included as a statutory aggravating circumstance, further increasing the punishment for serious acts of harm. In 2023, the Supreme People's Court and the Supreme People's Procuratorate issued the "Interpretation on Several Issues Concerning the Application of Law in Handling Criminal Cases of Serious Infringement on the Physical and Mental Health of Minors and Children," further refining the criteria for determining "causing harm to children."

However, the improvement of legislation and judicial interpretation has not completely resolved the core controversies in judicial practice. For example, the determination of "in public" is not lenient, and "relative openness" lacks quantitative standards. In traditional physical spaces, due to differences in the understanding of "relative openness" and "perceived possibility," there is a lack of unified judgment criteria in judicial practice regarding whether similar places such as tutoring classes and library corners belong to "public places." Some cases are recognized as "in public," while others are not, resulting in significant differences in the standards of judgment.

In the case of Xu Moumou's infringement on the physical and mental health of children, the defendant, Xu Moumou (male), was originally a calligraphy teacher at a training center. During a

class for three students, including the victim (female, 10 years old), he repeatedly and improperly touched the victim's chest and private parts while the victim was practicing calligraphy. The prosecution argued that Xu committed acts that harmed a child's physical and mental health "in public," but both the first and second instance courts ruled that this could not be considered "in public." Ultimately, the court sentenced Xu to three years imprisonment for crimes related to harming a child's physical and mental health. However, in the case of Meng and Le harming a child's physical and mental health, the defendant Meng, in a public square in a residential area, harmed Xu (five years old at the time of the incident) by hugging and inappropriately touching her private parts. The court sentenced him to seven years imprisonment. This demonstrates that the inconsistency in the above-mentioned determinations leads to significant differences in sentencing for similar circumstances in different cases, highlighting the urgent need in current judicial practice to establish clear and unified rules for determining the relativity of "public places" and the "perceived possibility" standard required for "in public."

Meanwhile, the development of internet technology has given rise to new scenarios such as "committing acts that harm children's physical and mental health through live streaming" and "recording and disseminating videos related to harming children's physical and mental health," which have sparked new controversies regarding "whether cyberspace is a public place" and "whether the audience in a live stream constitutes a 'public'." Although the Supreme People's Procuratorate's Case No. 43 of 2018, "Luo's Case of Harming Children's Physical and Mental Health," clearly stated that non-contact online harm to children's physical and mental health can constitute a crime, the rules for determining "online public" are still relatively blank, further exacerbating the confusion in judicial standards.

At its root, the above problems all stem from differing understandings of the core elements of "public," leading to excessive discretionary power for judges when applying the circumstances, resulting in "different judgments for the same case," affecting judicial fairness and the protection of the rights of underage victims. Therefore, it is necessary to clarify the criteria for determining "public place," define the basis for judging "perceived possibility," and unify the constituent elements for establishing "public" from an interpretative perspective. Accordingly, this article will conduct a specific analysis around the core elements of the "public" circumstance and explore a scientific and reasonable path for determination.

2. The Legal Basis and Normative Purpose of "Public" Circumstances in Crimes Related to the Harm of Children's Physical and Mental Health

In crimes related to the harm of children's physical and mental health, the "public" circumstance is treated as a circumstance for aggravated punishment, which has profound legal basis. From the perspective of the infringement of legal interests, the legal interests protected by crimes related to the harm of children's physical and mental health are the physical and mental health and personal dignity of children[1]. This legal interest determines that any act that harms the physical and mental health of children, regardless of whether the child's consent is obtained or in what place it is committed, constitutes a crime related to the harm of children's physical and mental health. From the perspective of the expansion of the infringement on social public order, stipulating the act of harming children's physical and mental health "in public" as an aggravated circumstance is to maintain the normal order and public morality of public places. Public places are areas of social public activity, representing the public image and order norms of society. The act of committing this act in public not only further tramples on the personal dignity of children, but also greatly impacts the moral sentiments of the public. This inevitably expands the infringement of legal interests to the negative impact on social public order and public morality. From the perspective of the perpetrator's subjective malice, the shift from non-public to public crimes against the physical and mental health of minors indicates that the perpetrator disregards the possibility of discovery by others present, either hoping for or allowing the

outcome to occur, demonstrating uncontrollable personal dangerousness and extremely rampant subjective malice[2].

In judicial practice, the determination of crimes against the physical and mental health of minors committed "in public places" has long revolved around two core issues: "whether the place needs to be completely open" and "whether there need to be actual witnesses."

Regarding the definition of "public places," there are two main core viewpoints in theory and practice, with the disagreement centered on "the basis for defining the scope of the place." One is the "formal enumeration theory," which tends to strictly limit it to places explicitly listed in judicial interpretations, such as schools, swimming pools, and children's playgrounds, emphasizing the clarity and predictability of the place type to avoid judicial arbitrariness [3]. This viewpoint worries that excessive expansion will blur the boundaries between public and private. The other is the "functional substance theory," which advocates using the functional attributes of the place, namely whether it has public use and personnel attributes, and whether there is a possibility of unspecified or majority use, as the core judgment criterion[4]. As long as a place has relative openness and the possibility of being perceived by unspecified or a large number of people, it can be identified as a "public place[5]." The Supreme People's Procuratorate's guiding case No. 42 in 2018 also reflects this tendency.

With the gradual improvement of relevant judicial interpretations, some disputes have been clarified, but new problems have arisen. In 2018, the Supreme People's Procuratorate further broadened the connotation of "in public" in its eleventh batch of guiding cases: For acts that seriously harm the physical and mental health of minors or children, committed in places not listed in the regulations, as long as the place is relatively public and there are other people present, and there is a possibility that it can be perceived by others, it can be considered a crime committed in public. In 2023, the Supreme People's Court and the Supreme People's Procuratorate, together with the Ministry of Public Security and the Ministry of Justice, issued the "Opinions on Punishing Crimes that Harm the Physical and Mental Health of Minors According to Law" (hereinafter referred to as the "Opinions"), Article 18 of which states: "Acts that seriously harm the physical and mental health of minors or children in public places such as schools, swimming pools, children's playgrounds, and student dormitories, as long as there are other people present, regardless of whether those present actually witnessed it, can be considered as crimes committed 'in public' in accordance with the provisions of Articles 236, Paragraph 3 and 237 of the Criminal Law."

Both of these theories focus on a static division of "place," neglecting the core of "public" in evaluating the actual impact of acts that harm children's physical and mental health on public order and children's personality. The formal enumeration theory fixes specific places, creating a loophole that "there is no public space outside the enumeration," potentially weakening protection. While the functional-substantive theory breaks through the limitations of form, its standards for "functional attributes" and "perceived possibility" are vague, lacking detailed rules. This can easily lead to an over-expansion of the scope of determination due to subjective judgment, violating the principle of restraint in criminal law and causing inconsistent judgments in similar cases. Even with recent judicial interpretations leaning towards the functional-substantive theory, these limitations have not been fundamentally resolved. For example, there are still no clear standards for the difference in the degree of "publicity" between dormitories and playgrounds, requiring further exploration between form and function in judicial practice. The limitations of both theories thus extend to specific applications.

3. Deconstruction of the Constituent Elements of "In Public" Circumstances

3.1. Analysis of Core Semantics and Number Standards

The "in public" element in the context of Chinese criminal law originates from the special protection needs of public order interests, and its core lies in the damage to social morality caused by the openness of the behavior. Traditional criminal law theory generally holds that "public" should refer to three or more people (including the number itself). This standard not only conforms to the basic understanding of "people" and "public" in Chinese semantics, but also is consistent with the

legislative practice of "three or more people" in the Criminal Law for crimes committed by a group[6]. However, from the perspective of judicial practice, mechanically applying the number standard may lead to injustice in individual cases. "Number of people" is not the only standard. It is more necessary to combine "place function" and "behavioral scene" to judge "group nature". The "public place" of crimes related to harming the physical and mental health of children is similar to the "public place" of theft and robbery. Both need to take "openness and non-specificity" as the core.

The scope of a public place not only encompasses the place itself but also extends to the "private spaces" within it that can be known by unspecified or a large number of people. In this special case, if a part of a public place is used by private individuals or specific people within a certain time and space, possessing temporary relative exclusivity, its subordination to the public place cannot be denied. In this case, the determination of "the public" needs to break through physical closure and return to the essential attributes of the public place; that is, the substantive judgment of public attributes takes precedence over the formal judgment.

From the literal meaning of "the public," its core is "non-singularity" and "public risk," rather than precise numbers. If there are only two people in the place, such as a teacher and a student alone, there is no possibility of a third party perceiving it, so it does not possess "public risk" and is difficult to classify as "the public." However, the potential risk of being perceived due to "group presence" aligns with the legislative intent of "the public," namely, to prevent psychological trauma and social harm to children in group environments by increasing penalties.

3.2. Expansion of the Normative Connotation of Public Places

The current judicial interpretations of "public places" show a shift from formal enumeration to substantive judgment. This shift is not accidental, but rather a necessary step to strengthen the protection of minors in a risk society. Referring to the standards for identifying public places in theft and robbery, "public places" should be defined as "physical or virtual spaces with public use and high personnel mobility." This category covers both physical and virtual spaces. This approach also provides an important reference for the identification of "public places" in crimes related to harming children's physical and mental health.

In judicial practice related to crimes harming children's physical and mental health, the scope of "public places" is constantly expanding. In the retrial of the case of "Qi Mou seriously harming the physical and mental health of minors and harming the physical and mental health of children" heard by the Supreme People's Court, the prosecutor from the Supreme People's Procuratorate pointed out that "public places have the characteristic of being entered and used by a large number of people[7]." This statement essentially emphasizes the functional attributes of "public places" and further confirms the guidance of "substantive judgment." The theoretical controversy and judicial evolution surrounding the "public" element in the "public" element of crimes related to the infringement of children's physical and mental health, as seen in the changes in legal interpretation, represent a collision and fusion of two major value concepts: "restraint in criminal law" and "special protection for minors." This fusion ultimately formed a logic of determination based on "functional substance as the core, while also considering scenario enumeration."

Specifically, regarding the aforementioned theoretical controversy between the "formal enumeration theory" and the "functional substance theory," the two are not mutually exclusive. The latter, in fact, upgrades the protection needs for minors based on the former. From the perspective of legislative purpose, the establishment of the "public" element in crimes related to the infringement of children's physical and mental health in criminal law is primarily aimed at strengthening the special protection of children's physical and mental health. From the perspective of judicial practice, "perceived possibility" takes precedence over "actual perception," which is an inevitable choice to address the limitations of "actual perception" and enhance the certainty of judicial determination. If "actual perception" is used as the standard, judicial practice requires repeated verification of whether "someone actually saw or heard" the infringement. However, such evidence is often subjective and fleeting. Witnesses may be unwilling to testify due to fear, or their accounts may be obscured, making

it difficult to provide clear accounts. This leads to insufficient evidence in some cases to establish the "public" aspect, weakening the severity of punishment. Simultaneously, it allows behaviors that, while not actually witnessed, pose a risk of being perceived by unspecified individuals to escape harsher penalties. Even if the perpetrator is not actually seen, their actions are in a state of "potential perception," and the psychological pressure and risk of harm to children are not fundamentally different from situations where the behavior is "actually perceived." In contrast, the judgment of "perceived possibility" can rely on verifiable objective factors such as the objective attributes of the location and the objective environment at the time of the behavior. It is precisely by inferring the existence of "perceived possibility" through the objective fact of "multiple people present" that the judgment difficulties under the "actual perception" standard are avoided, and a clear and operable basis for judicial personnel is provided.

Furthermore, from the perspective of the logic of criminal law interpretation, the priority of "perceived possibility" does not break through the core semantic category of "public place," but rather represents a reasonable expansion of its normative connotation. The essential attribute of a "public place" is that it is "public in nature and can be used by unspecified individuals or a large number of people." Its core lies in the "openness of the space and the uncertainty of the people involved," rather than "whether anyone actually uses or perceives it." As long as a place has the function of being used by unspecified individuals, and there are objective conditions for the behavior to be perceived by unspecified individuals when it occurs, it meets the essential characteristics of a "public place." "Actual perception" is merely a realized result of "perceived possibility," not a necessary condition for a "public place." Using "perceived possibility" as the core criterion neither exceeds the semantic boundaries of "public place" nor fails to fully respond to the needs of identifying certain controversial scenarios in practice, thus achieving a balance between stability and adaptability in the interpretation of criminal law.

In summary, whether considering the selection of theoretical viewpoints, the original intent of legislation, or the needs of judicial practice, the determination of "public" in the "public" element of crimes related to the infringement of children's physical and mental health should adopt an "objective standard guided by function and substance": prioritizing "perceived possibility" over "actual awareness" as the core element, without demanding "actual witnessing" or "completely open location." This is both a necessary requirement for protecting the rights of minors and an important guarantee for improving the certainty of judicial determination and maintaining judicial fairness.

3.3. Judicial Identification Rules for New Spaces

With the development of network technology, cyberspace is increasingly becoming "a kind of digital virtual society with reality." Negotiation and interaction can fully achieve "strong interference" with reality, and the behavior or consequences that occur online directly affect social relations in the real world[8]. Therefore, new scenarios such as "committing acts that infringe on children's physical and mental health in the form of live streaming" and "recording and disseminating videos related to the infringement of children's physical and mental health" are also increasing, thus triggering the controversy over "whether cyberspace constitutes 'public'".

Some scholars have proposed that the normative principle of crimes against children's physical and mental health committed remotely has evolved from the traditional taboo of physical contact to the principle of remote prevention and protection[9]. That is to say, for acts of harming minors remotely, which are not committed through physical contact but whose social harm is equivalent to traditional crimes against children's physical and mental health, judicial determination does not need to adhere to traditional requirements such as "causing actual harm to the victim's body or the physical environment" or "creating a real and imminent danger"; instead, the focus of protection should be on preventing such acts from causing damage to the psychological and mental health of minors, thereby achieving comprehensive protection of the physical and mental health rights of minors.

Combining the core criteria of "perceptual possibility and spatial attributes" of "the public" mentioned above, it can be further clarified that the key to whether a place can be considered a public

place is not whether the space is tangible and real, nor is the essence of a public place "the public's bodies can freely enter and exit," but whether it can be openly, simultaneously, and interactively "used by unspecified people or a large number of people"^[10]. That is, the "public" in cyberspace also needs to meet the requirements of "immediate perception" and "the presence of unspecified audiences."

If a perpetrator uses online live streaming to commit contact-based abuse against a child, such as forcing the child to expose their body or subjecting them to inappropriate touching, then, on the one hand, the viewer's viewing behavior occurs simultaneously with the perpetrator's aggression, and the perception process completely overlaps with the aggression process, meeting the "real-time public" requirement for "public"; on the other hand, the viewers in the live stream are mostly unspecified groups, also possessing the group nature and unspecified nature of "the crowd." If the number of people online in the live stream at any given time reaches three or more, and the image is clear and unobstructed, satisfying the possibility of perceiving the aggression, then it should be considered to possess "immediate perception" and "unspecified group nature," meeting the criteria for "the crowd." In this case, although the online live stream is not a physical space, it can still be regarded as a "virtual public place," and the establishment of "the crowd" is reasonable.

"Gathering in a crowd" that does not meet the requirement of temporal unity cannot be considered a "public" circumstance^[11]. For example, if the perpetrator uploads the screen recording to the internet or watches it with others after the act of infringement has ended, even if multiple people watch, because the "viewer's perception" and the "infringement" are not synchronized, the act has already been completed when the child watches, and the child is no longer in a "state of infringement perceived by the group." Lacking the core element of "immediacy," it is not appropriate to establish the "crowd" element. In this case, the act is more in line with the elements of the crime of "disseminating obscene materials," and should be punished concurrently with other crimes related to the infringement of children's physical and mental health, rather than being considered an aggravating circumstance of the crime related to the infringement of children's physical and mental health.

4. Construction of the Path for Determining "Public" Circumstances

Furthermore, the core controversy surrounding the determination of "publicity" lies in how to grasp the evidentiary standard of "perceived possibility." Two major challenges need to be addressed: first, the lack of quantifiable evidence for "relative openness" allows for significant discretionary power among judicial personnel, potentially leading to inconsistent judgments in similar cases; second, the subjective nature of judging "perceived possibility" means different judicial personnel have varying understandings of "possibility," and the need to consider multiple factors such as the venue environment and the distribution of people increases the complexity of the determination. Therefore, the establishment of objective evidentiary rules is urgently needed.

After breaking it down into two main elements, "publicity of the venue" and "publicity of the behavior," it can be further subdivided into three dimensions: first, the degree of openness, corresponding to "publicity of the venue," graded as "open daily / open during specific times / privately closed," defining the strength of publicness; second, the combination of crowd density and visible range, jointly supporting the determination of "publicity of the behavior," the core of which is "the possibility that the behavior is perceived by an unspecified majority of people," requiring the simultaneous fulfillment of "a perceiving subject," i.e., crowd density, and "perceiving conditions," i.e., visible range—both are indispensable.

Based on this, the author constructs a three-dimensional evaluation model of "openness, crowd density, and visibility," providing an objective basis for determining "public" situations through quantitative grading. The three-Dimensional Assessment Criteria for Determining "In Public" Circumstances is shown in table 1.:

Table 1. Three-Dimensional Assessment Criteria for Determining "In Public" Circumstances.

Evaluation Dimensions	Level 1 Standard (Meets the "Public" Circumstances)	Level 2 Standard (Needs to be combined with other circumstances)	Level 3 Standard (Does not meet the "Public" Circumstances)
Openness of the Venue	Fixed venues open to the public daily	Venues open only to certain groups (special groups) at specific times	Private enclosed spaces
Personnel Mobility	A large number of unspecified people are always present	Unspecified people occasionally enter and exit	Only specific personnel can enter and exit
Behavioral Visibility	Unobstructed and actions are obvious	Some degree of concealment but there is a possibility of being accidentally discovered	Relatively concealed

In practical application of this assessment model, judicial personnel can comprehensively consider the specific circumstances of the three dimensions to conduct a comprehensive and objective analysis and judgment. Specifically, for the dimension of openness of a place, it must meet the dual conditions of "non-enclosedness" and "public function". Spaces such as stations, shopping malls, and parks, which are open to the public on a daily basis, are typical public places with frequent personnel traffic and open spaces, possessing significant public attributes and fully meeting the first-level standard for openness of a place. For example, school classrooms allow people to freely enter and exit during breaks, possessing a certain degree of openness; hospital waiting areas, during normal consultation hours, are public areas used by specific groups such as patients and their families, belonging to places that are only open to certain groups at specific times, with occasional entry and exit by unspecified personnel, thus meeting the second-level standard and can be classified as quasi-public places. For private residences without fixed residents, because their spaces are enclosed and private, they do not possess public functions and therefore should not be considered "open places".

The personnel mobility dimension is judged based on whether "strangers can enter at any time" or "there is a possibility of a large number of unspecified people gathering". For example, during the business hours of a shopping mall, a large number of customers can freely enter and exit, and strangers can enter at any time, which meets the first-level standard for personnel mobility; however, when the scene shifts to a warehouse being cleaned after closing, only specific staff are allowed to enter, and personnel mobility is not met, so it does not meet the standard. In residential building corridors, there may be unspecified people entering and exiting, which meets the second-level standard. For relatively private personal spaces, such as residences and closed offices, personnel mobility should be considered extremely low.

The visibility dimension of behavior requires that acts that harm a child's physical and mental health be in a state that can be directly observed by an unspecified number of people. Besides directly undressing or touching sensitive areas, openly committing acts of harm in crowded public places, such as sexually suggestive touching of children, are typical examples of situations constituting the first-level standard for visibility. Possible second-level behaviors include inappropriate acts against children through curtains or clothing, which, while providing some concealment, still have the possibility of being accidentally discovered by others; and in public restroom stalls, although the space is relatively enclosed, if the stall door is not locked or has gaps, the indecent behavior may be noticed by passersby. These situations are all concealed but may be accidentally discovered, thus meeting the second-level standard.

When the facts of a case meet all or more of the conditions in the first-level standard, it can be directly identified as an act of harming a child's physical and mental health "in public," and aggravated circumstances apply; if only the second-level standard is met, other relevant circumstances, such as the frequency, means, and consequences of the act, need to be considered in a comprehensive judgment. For third-level circumstances and other situations, the determination of "public" is excluded, thereby controlling sentencing within a reasonable range.

5. Conclusion

The analysis of the "public" element in crimes related to the infringement of children's physical and mental health, especially its judicial determination and rule refinement, is not only an innovation in legal technology but also a touchstone for social civilization. Therefore, prioritizing the best interests of the child is not only a requirement for the special protection of vulnerable groups like minors but also reflects legal justice and social conscience. Given the special nature of such cases, subjective judgments by judicial personnel in determining sentencing may lead to discrepancies in sentencing results, further affecting the consistency and authority of judicial fairness. Therefore, we should clarify the connotations of legal provisions and conduct legal interpretations of "public" and other similar elements in a manner consistent with the original legislative intent and the needs of social development. Ultimately, this will achieve an organic unity between the general and special preventative functions of criminal law. Only by continuously promoting scientific legislation, refined judicial practices, and professional assessments can we build a comprehensive protective network that deters crime, soothes trauma, and safeguards dignity, creating a legally sound environment for minors.

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