

Testimony on the Harm of AI-Generated Child Sexual Abuse Material (CSAM)

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Thank you for the opportunity to testify today on an issue that strikes at the core of child protection in our digital era: artificial intelligence-generated child sexual abuse material.

My name is **Leslie Slingsby**, and I serve as CEO of **Mission Kids Child Advocacy Center**. I have spent my career working to protect children from abuse, exploitation, and trauma. Every day, I see the lifelong consequences that occur when a child's body or image is misused. Today, technology is creating new ways for that harm to occur, even when a child was never physically present.

The Harm of AI-Generated CSAM

AI-generated child sexual abuse material, also called synthetic CSAM or deepfake child abuse material, uses artificial intelligence to create realistic images or videos of children in sexual situations. Sometimes, these materials depict completely fabricated children. Other times, they use the face or likeness of a real child, placing them into sexualized content without their knowledge or consent.

The result is psychological and reputational damage that is just as real as physical abuse. When a real child's image is used, it becomes a digital form of sexual victimization. These images circulate online indefinitely, often impossible to erase, forcing the child to relive the violation every time the image resurfaces.

Even when AI creates an entirely fictitious child, the material still fuels and normalizes the sexualization of children. It reinforces the same exploitative patterns that drive the demand for child sexual abuse material and increases risk for real-world abuse. It blurs moral and legal boundaries in ways that protect offenders instead of children.

How AI-Generated CSAM Fuels Abuse and Exploitation

1. It normalizes and reinforces deviant sexual interest.

Research on sexual conditioning shows that repeated exposure to a sexual stimulus, real or artificial, can reinforce that preference over time. When someone with pedophilic tendencies consumes AI-generated CSAM, it rewards and strengthens that underlying attraction rather than diminishing it. Even if synthetic, these images depict children being sexualized, lowering the psychological and moral barriers to real-world exploitation.

2. It increases demand for real CSAM.

Access to "virtual" or "non-contact" abuse material has not reduced demand for

real content; it has often fueled it. Offenders frequently move from fantasy material to seeking authentic images. Law enforcement has found that individuals caught with AI-generated CSAM often also possess or attempt to access real child sexual abuse material. The National Center for Missing & Exploited Children (NCMEC) and Interpol warn that AI technology makes it easier and faster to generate and share this content, expanding exploitation networks and creating new victims when real children's faces are used.

3. It complicates detection and accountability.

The rapid spread of AI-generated CSAM floods law enforcement systems with synthetic material, making it harder to identify genuine child victims. This overload blurs the line between fake and real, shielding offenders and reducing the chances of rescuing children who are actively being abused.

4. It causes secondary harm to real children.

Even when a child was never physically involved, AI-generated CSAM often uses real children's faces or likenesses scraped from social media, school websites, or family photos. These children and their families experience deep trauma, fear, and shame knowing their image has been weaponized for sexual exploitation.

Organizations such as NCMEC, Thorn, and the International Centre for Missing & Exploited Children all recognize AI-generated CSAM as a form of child sexual exploitation, not an abstract or victimless crime.

The Legal Gap Under the Child Protective Services Law (CPSL)

Under Pennsylvania's Child Protective Services Law (CPSL), the definition of *child* refers to an *individual under 18 years of age*. Because of that, the law's current structure only applies when there is a real, identifiable child victim.

That creates a significant limitation when it comes to AI-generated child sexual abuse material. If the image or video depicts a real child—such as when a perpetrator uses the face or likeness of a minor and places it into sexualized content—then the act clearly meets the standard for reportable child abuse. The child is real, the harm is real, and it must be reported.

However, when the AI-generated image depicts a *synthetic* child who does not exist, that same conduct may not be reportable under current law because there is technically no "child" as defined by statute. Yet the behavior, the intent, and the risk it poses remain deeply concerning.

Even when no real child exists in the imagery, the creation, possession, or distribution of AI-generated CSAM is a strong indicator of sexual interest in children. Decades of research and law enforcement experience show that individuals who engage with CSAM, whether real or synthetic, have a significantly higher likelihood of acting out sexually against real children.

That is why traditional CSAM offenses fall squarely under child abuse statutes: because they are not only about the harm to a specific child, but about the *protection of all children* from those who demonstrate sexual interest in minors. The same principle must apply to AI-generated CSAM.

Allowing individuals who create or distribute synthetic child sexual abuse material to avoid being indicated under the CPSL leaves children vulnerable. Without a mechanism to indicate these individuals as alleged perpetrators, there is no official record to prevent them from obtaining positions of trust or employment with children.

The intent of the CPSL has always been both reactive and preventative, to protect children from known offenders and to ensure that those who pose a risk cannot work in environments where they could harm a child. Expanding the CPSL to include AI-generated CSAM would uphold that intent. It would enable child protective services to indicate alleged perpetrators of synthetic child exploitation, ensuring that they cannot work in schools, child care settings, or other child-serving organizations.

By closing this loophole, we strengthen Pennsylvania's ability to protect children from those who display predatory behavior, whether their exploitation takes place in the physical world or through digital means.

Why It Must Fall Under Mandated Reporting

Our child protection framework requires professionals, educators, law enforcement, healthcare providers, and others, to report suspected child abuse and exploitation. Yet many of these laws were written before technology made it possible to create "child abuse" from code instead of a camera.

When AI-generated CSAM is discovered, there is often confusion about whether it constitutes reportable child abuse, particularly when the depicted child does not exist in reality. That uncertainty leaves gaps that offenders exploit, frustrates investigators, and undermines our collective duty to protect children.

Bringing AI-generated CSAM under mandated reporting laws would:

1. **Align with the spirit of child protection.** Mandated reporting has never been about the medium, it's about ensuring adults act when a child is being harmed or exploited. AI-generated CSAM is simply an evolution of exploitation, not an exception to it.
2. **Empower investigators to act quickly.** Requiring mandated reporters to report AI-generated CSAM creates a clear path for law enforcement and cybercrime units to identify offenders, trace creators, and stop distribution before it escalates into contact offenses.

3. **Protect real children.** Many synthetic images are built from real photographs of children. Expanding reporting laws ensures that those whose likenesses are used receive the same protection, investigation, and services as any other child exploitation victim.

A Call to Modernize Our Mandated Reporting Framework

Technology evolves faster than policy, but our commitment to protecting children must evolve just as quickly. The use of AI to generate CSAM is not a victimless act, it is a rebranding of child sexual exploitation through digital tools.

If we allow this material to exist outside our child protection laws, we are effectively sanctioning a new form of abuse. Including AI-generated CSAM under mandated reporting laws sends a clear message: any use of a child's image, likeness, or identity for sexual exploitation, real or synthetic, is a reportable act of harm.

Children deserve a digital world that protects their dignity as fiercely as their physical safety. I urge this body to close the legal gap and ensure AI-generated CSAM is explicitly covered under mandated reporting laws.

Thank you for your time and for your commitment to safeguarding children in both the physical and digital worlds.