

TESTIMONY MATERIALS
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Support for HB4320 and HB4387:
Reforms to protect Vulnerable Adults against predation and abuse

Michigan House of Representatives
Committee for Families, Seniors and Children

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10 Key Policy Considerations for HB4320 and HB4387

1. Vulnerable Adults are a legal “protected class.” These bills modernize the existing abuse protections for Vulnerable Adults under Michigan law.
2. Technology advancements have increased predation risks during the last two decades. These bills recognize that today’s technologies provide predators with increased access to communications with Vulnerable Adults.
3. Vulnerable Adults often have challenges with decision making. They are often unable to recognize an abusive situation and lack the ability to report abuse to their caretakers.
4. Vulnerable Adults often rely on e-communications and social media. Many Vulnerable Adults use the Internet as their primary social communication platform.
5. In cases of Vulnerable Adults, chronological age and cognitive age are usually very different.
6. Under the law, acts of abuse always lack mutual consent— abuse and consent cannot legally coincide. It is well-established in Michigan law that acts of abuse can never be considered mutually consensual.
7. The bills’ mens rea (perpetrator’s state of mind) use the two highest legal standards for criminal culpability: intentionally and knowingly. A perpetrator cannot accidentally or inadvertently take advantage of a Vulnerable Adult. These bills do not include “reckless” or “negligent” actions because they do not apply to accidental, unintentional, or inadvertent acts.
8. The bills do not impede Constitutional freedoms of free speech and sexual self-expression in any way. These bills will hold criminals accountable for their abuse and deter would-be predators.
9. As a population, Vulnerable Adults face the *highest risk* of being targeted and exploited in both online and in-person scenarios. The bills reflect the well-documented fact that abusers typically seek out Vulnerable Adults for sexual predation.
10. Vulnerable Adults face severe harms from abuses related to sexually explicit visual material. A Vulnerable Adult’s personal trauma from abuse is often permanent and life-long.

Executive Summary of HB4320 and HB4387 Reforms to Protect Vulnerable Adults

No.	Policy consideration	<u>What</u> the bill states	<u>Why</u> these bills urgently need to be passed
1	Vulnerable Adults are a legal “protected class.”	A Vulnerable Adult is already part of a protected legal classification of people under Michigan law. This legislation does not change the existing legal definition, which has been in place since 1994. See Michigan Compiled Laws (MCL) 750.145m (1994).	<p>These bills modernize the existing abuse protections for Vulnerable Adults under Michigan law:</p> <p>Because of their vulnerable status, Vulnerable Adults require specific legal protections by definition. Vulnerable Adults include two key groups of people with serious disabilities: (1) intellectual and developmental disabilities (IDD), and (2) cognitive impairments (developed later in life).</p>
2	Technology advancements have increased predation risks during the last two decades.	The bill is focused on the nonconsensual provision of sexually explicit visual materials. It is triggered by knowing or intentional actions “in a manner that causes the Vulnerable Adult to provide that person, or any other person, sexually explicit visual material.”	<p>These bills recognize that today’s technologies provide predators with increased access to communications with Vulnerable Adults:</p> <p>When Michigan’s Vulnerable Adult statute was passed in 1994, abuses resulting from sexually explicit visual material were not as prevalent as they are today. In the last 28 years, society has experienced significant advances in Internet, electronic communications, and digital photography technology. As a result of these innovations, abusers can take advantage of Vulnerable Adults in a myriad of ways.</p>

<p>3</p>	<p>Vulnerable Adults often have challenges with decision making.</p>	<p>The phrase “the vulnerability of a Vulnerable Adult” recognizes that people within this classification can be taken advantage of by predators.</p>	<p>Vulnerable Adults are often unable to recognize an abusive situation and lack the ability to report abuse to their caretakers:</p> <p>These bills are predicated on the large body of neurological evidence demonstrating that a person’s chronological age does not necessarily coincide with their cognitive or mental age. This incongruence poses adverse effects on one’s ability with regard to judgment and decision making, as well as one’s ability to discern the intent of others. In general, Vulnerable Adults are unable to identify and discern the extent of a threat. Vulnerable Adults have a diminished ability to spot an abuser.</p> <p>These bills align with the evidenced reality that all Vulnerable Adults, but particularly those with cognitive impairments and intellectual disabilities, constitute a community with the highest risk factors for experiencing bullying, exploitation, and aggression from in person and online abuse.</p> <p>Many Vulnerable Adults experience major challenges in discerning whether a situation or person is predatory in nature because Vulnerable Adults face significant challenges with: (1) reasoning, problem solving, and (3) personal judgment. As a result, they are ripe targets for abuse regarding sexually explicit visual materials.</p>
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<p>3 con- tin- ued</p>	<p>See above.</p>	<p>See above.</p>	<p>Vulnerable Adults have three areas of cognitive functioning that are impaired or lacking: conceptual, social, and practical. Specific challenges include:</p> <ol style="list-style-type: none"> 1. Conceptual: Language, reading, writing, math, reasoning, knowledge, and memory. 2. Social: Empathy, social judgment, communication skills, the ability to follow rules and the ability to make and keep friendships. 3. Practical: Independence in areas such as personal care, job responsibilities, managing money, recreation and organizing school and work tasks. <p>When compared to the general population, Vulnerable Adults face online abuse risks that are more pronounced and far more underreported. Some Vulnerable Adults have challenges with speaking, describing things in detail, or discussing events in a proper time sequence. Additionally, Vulnerable Adults often do not have the skillset and awareness to say “no” to activities or communications that they do not wish to engage in.</p>
<p>4</p>	<p>Vulnerable Adults often rely on e-communications and social media.</p>	<p><i>Supra</i> Policy Consideration Number 3.</p>	<p>Many Vulnerable Adults use the Internet as their primary social communication platform:</p> <p>In the U.S., people of all backgrounds face increased risks of exploitation and abuse over social media, however, limiting a Vulnerable Adult’s access to e-communications can never be a solution to online abuse problems. These bills help to make e-communications safer for Vulnerable Adults.</p>

			<p>Many Vulnerable Adults connect with others in their communities using social media. This is even more likely for individuals with limited mobility and transportation options due to an impairment. Due to low community participation levels, for many, social media provides a connection to others. For these reasons, Vulnerable Adults are not inclined to log off the Internet or close their social media accounts to avoid threats of abuse.</p>
5	<p>In cases of Vulnerable Adults, chronological age and cognitive age are usually very different.</p>	<p><i>Supra</i> Policy Consideration Number 3.</p>	<p>Chronological age and cognitive age are not the same: Though an individual may be a legal adult, it is a mistake to equate a chronological age— the number of years lived— with a cognitive age or mental age.</p>
6	<p>Under the law, acts of abuse always lack mutual consent— abuse and consent cannot legally coincide.</p>	<p>The phrase “the vulnerability of a Vulnerable Adult” confirms that the actions are without the Vulnerable Adult’s consent.</p>	<p>It is well-established in Michigan law that <i>acts of abuse</i> can never be considered mutually consensual: These bills reflect that interactions/communications regarding sexually explicit visual material require mutual consent.</p> <p>A person cannot consent to abuse. The bills are very clear on this point—there is no legally acceptable reason for abusive actions against a Vulnerable Adult. In the same vein, existing Michigan law does not allow actions that constitute abuse in any circumstances. The bills specify such circumstances regarding sexually explicit visual materials.</p>

7	<p>The bills’ <i>mens rea</i> (perpetrator’s state of mind) use the two highest legal standards for criminal culpability—under these bills a perpetrator cannot accidentally or inadvertently take advantage of a Vulnerable Adult.</p>	<p>The perpetrator must act “in a manner that causes the Vulnerable Adult to provide that person, or any other person, sexually explicit visual material.” The perpetrator must act “intentionally or knowingly” to satisfy the legal requirements for a criminal state of mind.</p>	<p>These bills purposely do not include reckless or negligent actions because they do not apply to accidental, unintentional, or inadvertent actions with a Vulnerable Adult:</p> <p>The bills’ causation requirements reflect that intentionally or knowingly manipulating a Vulnerable Adult is an act of abuse. Mere reckless or negligent actions are not deemed illegal under these bills. Generally, criminal law recognizes four primary states of mind for criminal culpability:</p> <ol style="list-style-type: none"> 1) <i>Required</i> by the bills: Acting <i>intentionally</i> (purposely), where- the defendant had an underlying conscious object to act; 2) <i>Required</i> by the bills: Acting knowingly, where the defendant is practically certain that the conduct will cause a particular result; 3) <i>Not required</i> by the bills: Acting recklessly, where the defendant consciously disregarded a substantial and unjustified risk; and 4) <i>Not required</i> by the bills: Acting negligently, where the defendant was not aware of the risk, but should have been aware of the risk. <p>These legal categories are hierarchical, with intentional and knowing actions as the most comprehensive standards for criminal prosecution.</p>
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8	The bills do not impede Constitutional freedoms of free speech and sexual self-expression in any way.	Any actions that have mutual consent from the Vulnerable Adult and other parties cannot be “harass[ment], abus[ive], threaten[ing], compel[ing], forc[eful], coerc[ive], or exploit[ative].	<p>These bills will hold criminals accountable for their abuse and deter would-be predators:</p> <p>Any individual is free to communicate with a Vulnerable Adult concerning sexually explicit visual material as long as the communications are consensual. Manipulating a Vulnerable Adult with actions that harass, abuse, threaten, compel, force, coerce or exploit a Vulnerable Adult can never be deemed consensual sexual self-expression or legally protected free speech—these actions are abuse and, as such, must be specified as illegal conduct.</p>
9	As a population, Vulnerable Adults face the <i>highest risk</i> of being targeted and exploited in both online and in-person scenarios	.Supra Policy Consideration Number 3.	<p>The bills reflect the well-documented fact that abusers typically seek out Vulnerable Adults for sexual predation:</p> <p>Vulnerable Adults need specific legal protections against predation and abuse because this group has the <u>highest</u> risk factors for abuse and exploitation. Vulnerable Adults are far more likely to experience abuse—both online and in person—than adults in the general population. Vulnerable Adults</p>
10	Abuse regarding sexually explicit visual material causes significant health and wellness damages to Vulnerable Adults.	The bills concern damages as a result of harassment, threats, compulsion, abuse, force, coercion, and/or exploitation.	<p>A Vulnerable Adult’s personal trauma from abuse is often permanent and life-long:</p> <p>These damages include: (1) serious pain and suffering, and (2) loss of full function. Such damages may be permanent/life-long in nature. In comparison to the general population, Vulnerable Adults usually face greater challenges in processing and healing from abuse.</p>

June 20, 2023

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The Honorable Representative Stephanie A. Young, Committee Chair
Michigan House of Representatives Committee for Families, Seniors, and Children

The Honorable Representative Coffia, Majority Vice Chair
Michigan House of Representatives Committee for Families, Seniors, and Children

The Honorable Representative Douglas Wozniak, Minority Vice Chair
Michigan House of Representatives Committee for Families, Seniors, and Children

**Re: Support for HB4320 and HB4387, reforms to protect
Vulnerable Adults against predation and abuse**

Dear Representative Young, Representative Coffia, and Representative Wozniak:

Please include this Letter of Support as part of your documentation to turn HB4320 and HB4387 into State of Michigan law. The undersigned have performed a detailed analysis of these bills and wholeheartedly approve of the proposed legislation.

I. House Bills 4320 and 4387 will close a gap in Michigan law and must be enacted

House Bills 4320 and 4387 (the bills) will modernize the Michigan Penal Code to specify that it is, in fact, abuse to seek or obtain sexually explicit visual material from a Vulnerable Adult. Specifically, the bills will prohibit a person from:

- 1) intentionally or knowingly harass[ing], abus[ing], threaten[ing], compel[ing], forc[ing], coerc[ing], or exploit[ing]
- 2) the vulnerability of a Vulnerable Adult
- 3) in a manner that causes the Vulnerable Adult to provide that person, or any other person, sexually explicit visual material.

The phrase “the vulnerability of a Vulnerable Adult” confirms that the actions are without the Vulnerable Adult’s consent. It is well-established in Michigan law that abuse can never be considered mutually consensual. Ultimately, the bills hold criminals accountable for their abuse. *See* Tables 1 and 2 below. In the same vein, any actions that have mutual consent

from the Vulnerable Adult and other parties cannot be “harass[ment], abus[ive], threaten[ing], compel[ing], forc[eful], coerc[ive], or exploit[ative].

This legislation does not change the existing legal definition of a Vulnerable Adult, which has been a protected classification under Michigan law since 1994. *See* Michigan Compiled Laws (MCL) 750.145m (1994), Table 3. There is an urgent need to modernize state laws to protect Vulnerable Adults with severe intellectual impairments against online predation. Vulnerable Adults include individuals with severe intellectual and/or developmental disabilities, as well as individuals that have a severe cognitive impairment. Michigan laws must include specific language that protects Vulnerable Adults from online predators.

Once enacted into law, the bills will deter would-be predators and hold offenders criminally accountable when they seek sexually explicit visual materials from a Vulnerable Adult without the Vulnerable Adult’s consent. These bills create meaningful protections for Vulnerable Adults who are targeted for sexual exploitation over the Internet. Because this legislation is focused explicitly on communications that occur without mutual consent, these laws protect Vulnerable Adults without infringing on anyone’s Constitutional rights to freedom of speech and expression..

II. Vulnerable Adults need strong protections against predation and abuse

Federal law requires each state to have specific legal protections to guard those age 17 and younger against online abuse. *See* 15 USC §§ 6501–6505 (1998), 47 USC § 231 (1998), and 18 USC §§ 2251 et seq. (2008). Most of these legal protections do not apply once a person reaches legal adulthood at age 18, even in cases where an individual is a Vulnerable Adult. Throughout history, America’s Internet predation laws have largely focused on protecting minors and not adults. Under federal law, it is illegal for an adult to share sexually explicit visual materials over the Internet with someone age 17 or younger. If both parties are age 18 or older, however, this same online exchange may be legal and protected under Constitutional rights to freedom of speech/expression. The key difference between the two scenarios is not a person’s age in and of itself, but the ability to provide legally binding consent.

Vulnerable Adult policies encompass two groups of individuals: (1) people with severe intellectual and developmental disabilities that present early in life, and (2) people with severe cognitive impairments that present later in life. *See* MCL 750.145m (1994). Vulnerable Adults experience a number of challenges in their day-to-day functioning, including challenges that impact reasoning, problem solving, and ability to make judgments. The chronological age of a Vulnerable Adult—the number of years lived—does not typically coincide with their cognitive or mental age. As a population, Vulnerable Adults face the highest risk of being targeted or exploited in both online and in-person scenarios.

During our testimony before this Committee in June 2019 and March 2021, we illustrated three areas of overall functioning that pose challenges for Vulnerable Adults. These areas include conceptual, social, and practical functioning. Many Vulnerable Adults experience challenges with regard to their ability to interpret social situations, which can pose safety risks

for Vulnerable Adults who lack the cognitive capacity to identify and recognize unsafe situations.

III. The bills align with Michigan’s existing laws

Michigan is one of the majority of states that have adopted a “Nonconsensual Pornography Statute.” It is a misdemeanor crime in Michigan for an adult to share sexually explicit photos of another person without their permission. *See* MCL 750.145(e) (2016). Specifically, it is illegal under Michigan law to “disseminate” any sexually explicit visual material of another adult with the intent to “threaten, coerce, or intimidate.” *See* Table 4. By comparison, HB4320 and HB4387 concern Vulnerable Adults and do not address on dissemination matters. The bills focus on an offender’s exploitative actions towards a Vulnerable Adult—requesting, persuading, convincing, threatening, commanding, forcing, or coercing a Vulnerable Adult into sharing sexually explicit visual material of himself or herself. Online exploitation of a Vulnerable Adult is not a matter of sexual self-expression between mutually consenting parties. Make no mistake, these bills address a form of violence over the Internet.

IV. Reference Tables 1–4

Table 1. Age and Consent Considerations in Michigan: Four Scenarios with Adults/Minors

Example Number	Individuals	Example Details	Legal Concerns
Scenario 1	Adult (age 18 or older) and a minor (age 17 or younger)	An adult shares sexually explicit visual materials over the Internet with a minor. The minor communicates that he/she consents to this exchange. The adult communicates that he/she consents to this exchange.	The minor’s statement of consent is not legally valid. It is a criminal offense to send photos that are sexually explicit of people who are not yet 18 years old. The adult’s actions with the minor in Scenario 1 are illegal .
Scenario 2	Adult (age 18 or older) and another adult (age 18 or older)	Adult 1 obtains sexually explicit visual materials of Adult 2. Adult 1 knows (or reasonably should know) that the materials are private in nature. Adult 1 also knows (or reasonably should know) that Adult 2 did not provide consent to disseminate the materials. Despite this knowledge, Adult 1 shares the materials with others.	The adult’s actions with the other adult in Scenario 2 are likely illegal under civil and/or criminal law because of the lack of consent from Adult 2. <i>See e.g.</i> , MCL 750.145m(u) (1994).

<p>Scenario 3</p>	<p>Adult (age 18 or older) and another adult (age 18 or older)</p>	<p>Adult 1 obtains sexually explicit visual materials of Adult 2. Adult 1 knows (or reasonably should know) that the materials are private in nature. Adult 2 provides consent to disseminate the materials and Adult 1 disseminates the materials online.</p>	<p>The adults' actions in Scenario 3 are legal. There is mutual consent between both adults.</p>
<p>Scenario 4</p>	<p>Adult (age 18 or older) and another adult (age 18 or older)</p>	<p>Adult 2 is a "Vulnerable Adult." Adult 1 obtains sexually explicit visual materials of Adult 2 without valid consent from Adult 2. Adult 1 knows (or reasonably should know) that the other person did not consent to provide sexually explicit visual material. Adult 1 acts by requesting, persuading, convincing, threatening, commanding, forcing, and/or coercing Adult 2 to provide the materials without mutual consent.</p> <p>Unlike Scenarios 2 and 3 above, there is no dissemination of materials to any third party.</p>	<p>Under current Michigan law, these actions to exploit a Vulnerable Adult may be deemed legal. Though mutual consent is not present in Scenario 4, current laws do not hold Adult 1 legally accountable.</p>

Table 2. “Vulnerable Adult” Definition under Michigan Law: Three Categories

Element Details	Michigan Compiled Law (MCL) Sections
<p>1. An individual age 18 or over; <i>and</i> 2(a). Who requires supervision because of age, developmental disability, mental illness, or physical disability; <i>or</i> 2(b). Who requires personal care because of age, developmental disability, mental illness, or physical disability; <i>or</i> 2(c). Who lacks the personal and social skills required to live independently because of age, developmental disability, mental illness, or physical disability.</p>	<p>MCL 750.145m(u)(i) (1994)</p>
<p>1. An individual age 18 or over; <i>and</i> 2. Who is placed in an adult foster care family home or an adult foster care small group home.</p>	<p>MCL 750.145m(u)(ii) (1994) citing MCL 400.703(3)(1)(b) of the Adult Foster Care Facility Licensing Act, MCL 722.115(5)(6), and MCL 722.115(5)(8)</p>
<p>1. An individual age 18 or over; <i>and</i> 2. Who is unable to protect himself or herself from abuse, neglect, or exploitation because of a mental or physical impairment or advanced age; <i>and</i> 3. Who is and who is suspected of being—or believed to be—abused, neglected, or exploited.</p>	<p>MCL 750.145m(u)(iii) (1994) citing Michigan Compiled Law 400.11(b) of the Social Welfare Act</p>

Table 3. Vulnerable Adults and the Three Risks of Internet Abuse

Risk Details
<p>Vulnerable Adults have <i>the</i> highest risk of being targeted for online predation (in comparison to adults in the general population).</p>
<p>Vulnerable Adults have <i>the</i> highest risk of being abused by online predators (in comparison to adults in the general population).</p>
<p>Vulnerable Adults require extensive protections against online abuse to avoid negative health and wellness outcomes. Vulnerable Adults have an increased risk (in comparison to adults in the general population) of having extensive or permanent emotional damage as a result of online abuse.</p>

Table 4. Comparing Michigan “Nonconsensual Pornography” Law and Proposed Legislation to Guard Vulnerable Adults Against Online Predation

Michigan’s “Nonconsensual Pornography” law, MCL 750.145(e) (2016)	
Focus	An offender’s actions to <i>disseminate</i> sexually explicit visual material of an adult without the adult’s consent.
Elements	<ol style="list-style-type: none"> 1. A person shall not intentionally and with the intent to threaten, coerce, or intimidate... 2. Disseminate any sexually explicit visual material of another [adult] person if all of the following [four] conditions apply: 3. The other person is not less than 18 years of age [age 18 or older]. 4. The other person is identifiable from the sexually explicit visual material itself or information displayed in connection with the sexually explicit visual material. This subdivision does not apply if the identifying information is supplied by a person other than the disseminator. 5. The [offender]... obtains the sexually explicit visual material of the other person under circumstances in which a reasonable person would know or understand that the sexually explicit visual material was to remain private [and] 6. The [offender]... knows or reasonably should know that the other person did not consent to the dissemination of the sexually explicit visual material.

In HB 4320:

- 1) intentionally or knowingly harass[ing], abus[ing], threaten[ing], compel[ling], forc[ing], coerc[ing], or exploit[ing]
- 2) the vulnerability of a Vulnerable Adult
- 3) in a manner that causes the Vulnerable Adult to provide that person, or any other person, sexually explicit visual material.

Michigan House Bill 4320 (2023), proposing a specification within the State Penal Code	
Focus	An offender’s actions to <i>exploit</i> (harass, abuse, threaten, compel, force, coerce, or exploit a Vulnerable Adult into sharing sexually explicit visual material of the Vulnerable Adult.
Elements	<ol style="list-style-type: none"> 1) intentionally or knowingly harass[ing], abus[ing], threaten[ing], compel[ling], forc[ing], coerc[ing], or exploit[ing] 2) the vulnerability of a Vulnerable Adult 3) in a manner that causes the Vulnerable Adult to provide that person, or any other person, sexually explicit visual material.

V. Expert Qualifications


The undersigned are experts in the fields of aging and disability and are uniquely qualified to understand the needs of Vulnerable Adults with disabilities. Both individuals are active speakers at the state, national, and international levels regarding disability and special needs issues for Vulnerable Adults and authors of numerous peer-reviewed journal articles in the field. The information stated herein is based on our knowledge, training, and experience within our respective fields. The following is a brief bio for each of the signees.

Annemarie Kelly, JD, LLM is an attorney and Assistant Professor in the Department of Health Administration for the College of Health and Human Services at Eastern Michigan University in Ypsilanti, Michigan. Annemarie has served as counsel for businesses and individuals across the country in healthcare regulatory compliance and health policy matters. She formerly worked as a Compliance Officer and State Administrative Manager for the Michigan Department of Health and Human Services in Lansing, Michigan. In 2020, Annemarie received the Crain's Detroit Business "Notable Women in Health Care Award." The list celebrates female leaders throughout the health care sector for excellence in health care research, mentoring, teaching, and service work. She can be reached at akelly30@emich.edu

Christina Marsack-Topolewski, PhD, LMSW is an Associate Professor in the School of Social Work for the College of Health and Human Services at Eastern Michigan University in Ypsilanti, Michigan. Formerly a special education teacher in public school systems, she still serves as a teacher consultant to help support students with special needs and their families. Christina is a co-investigator on the Michigan Older Caregivers of Emerging Adults with Autism and other Neurodevelopmental Disabilities (MI-OCEAN) Family Support Project. As an appointee to the National Task Group (NTG) for Intellectual Disabilities and Dementia Care Practices, she currently serves on the NTG Steering Committee. She can be reached at ccmarsack@emich.edu

If you have any questions or concerns regarding this Letter of Support, please do not hesitate to reach out to us at akelly30@emich.edu and ccmarsack@emich.edu.

Sincerely,



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