

CYBERSTALKING: AN EXPLORATORY STUDY OF LAW ENFORCEMENT IN ALLEGHENY COUNTY, PENNSYLVANIA

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ABSTRACT

The increase use of the Internet has created an impact on the number of online harassing/cyberstalking cases. The primary functions of the Internet are to communicate and research information. The ease at which individuals can communicate electronically has led to a relatively new crime called cyberstalking. This exploratory study of 123 chiefs of police in Allegheny County, Pennsylvania in which 102 responded to the study, found that 37% of police departments had reported cases of cyberstalking in 2008. This study argues that cyberstalking and harassment will only decrease when the extent of the problem is fully understood and potential victims and law enforcement understand the protections necessary under the law.

Keywords: cyberstalking, stalking, law enforcement, online harassment, electronic communication

INTRODUCTION

The increased use of the Internet has created an impact on the number of online/harassing cyberstalking cases. The primary functions of the Internet are to communicate and research information. The Internet has become a medium for people to communicate locally or globally in the course of business, education and their social life. The Internet has made it easy for people to compete, meet a companion, or communicate with people on the other side of the world with the click of a mouse. In 2008, according to the Internet World Stats Report, 237,168,545 people use the Internet in the United States; as a result there is a concern for Internet safety (Internet World Stats, 2009).

Since the 1990s, stalking and harassing have become more common via the Internet. Until the early 1990's, if a person needed to find information on a given topic for research or a school project, hours could be spent in the library. Some people were lucky enough to have a set of encyclopedias in their homes where a limited amount of information could be found. Public records were always available to people, but one would have to drive to the local courthouse to locate the records. Going on a family road trip required the purchase of large road maps or trip tickets from the travel agency. In 2009, research, locating records, people, phone numbers, and directions, can occur with the click of a button without one ever having to leave their home. This accessibility to information through the use of technology has encouraged a relatively new phenomenon called cyberstalking.

The United States Department of Justice defines cyberstalking as the "use of the Internet, e-mail, or other electronic communication devices to stalk another person" (U.S. Attorney General Report, 1999, p.2). Offline stalking is a crime with which many people

are familiar. Stalking is a “repetitive pattern of unwanted, harassing or threatening behavior committed by one person against another” (Mechanic, 2000, p. 1). Stalking that involves the use of multiple individuals to stalk, harass or threaten a victim is known as gang stalking (Gang Stalking, 2006). Although offline stalking acts have been reported since the 19th Century, cyberstalking is a crime that is just being examined and reported since the late 1990s. The U.S. Attorney General states, “stalking is an existing problem aggravated by a new technology” (U.S. Attorney General Report, 1999, p.2). Similarities have been noted between offline stalking and cyberstalking cases, including the fact that “the majority of cases involve stalking by former intimates, most victims are women, most stalkers are men and stalkers are generally motivated by the desire to control the victim” (U.S. Attorney General Report, 1999, p. 3). Using technology to stalk a victim can include, but is not limited to, the Internet, e-mail, text messaging, global positioning systems (GPS), digital cameras, video cameras and social network sites. One of the differences between cyberstalking and offline stalking is that cyberstalkers face no geographic boundaries. The Internet makes it possible for a person to be stalked virtually anywhere in the world.

PURPOSE OF STUDY

Citizens should be able to feel safe when using the Internet without being stalked or harassed. But, the increased use of the Internet has caused a national increase in the number of online cyberstalking/harassment cases. The purpose of this research study is to explore the manner in which law enforcement agencies in Allegheny County, Pennsylvania are addressing reported cases of cyberstalking. This study argues that cyberstalking and harassment will only decrease when the extent of the problem is fully understood and potential victims and law enforcement understand the protections necessary under the law. This study explores the following research questions:

- RQ1 – Do the number of available police officers impact the method used to handle cyberstalking complaints?
- RQ2 – What is the current level of criminal charges on reported cases of cyberstalking?
- RQ3 – How many police departments in Allegheny County received cyberstalking complaints?

STALKING DEFINED

Offline stalking acts have been reported since the 19th Century. Cyberstalking is a new crime that is just being examined and reported since the late 1990's. Many similarities exist between stalking and cyberstalking. In order to understand cyberstalking it is necessary to define stalking. The U.S. Department of Justice defines stalking “as harassing and threatening behavior that an individual engages in repeatedly” (U.S. Department of Justice, 2001, p.1). These behaviors include, but are not limited to, following a person, repeated phone calls and phone messages, appearing outside a persons home or work, vandalism, taking an individuals mail or entering a persons home. The U.S. Department of Justice (2001) reports most stalking laws require the perpetrator

(the person committing the stalking) to make a credible threat of violence against the victim. Stalking, therefore, can be used to instill fear and/or intimidate the victim.

A person commits stalking if they cause another person to fear for their safety. “Stalking is a crime of power and control” (National Institute of Justice, 2002, p.1) As defined by Tjaden and Thoennes(1998), stalking is a course of conduct directed at a specific person that involves repeated (two or more occasions) visual or physical proximity, nonconsensual communication, or verbal, written or implied threats, or a combination thereof, that would cause a reasonable person fear.

CYBERSTALKING DEFINED

The Internet and use of telecommunications technologies have become easily accessible and are used for almost every facet of daily living throughout the world. Cyberstalking is “the use of the Internet, e-mail and other electronic communication devices to stalk another person” (U.S. Department of Justice, 2001, p.1). For this study, cyberstalking will be referred to as online stalking and is similar to offline stalking, which is being aggravated by new technologies. Cyberstalking “entails the same general characteristics as traditional stalking, but in being transposed into the virtual environment as it is fundamentally transformed” (Ogilvie, 2000, p.1). Stalking itself is not a new crime, but cyberstalking is a new way to commit the crime of stalking while using the Internet or other forms of electronic communication devices.

Stalkers, both online and offline, “are motivated by the desire to exert control over their victims and engage in similar types of behavior to accomplish this end” (U.S. Attorney General Report, 1999, p.3). The term cyberstalking can be used interchangeably with online harassment. “A cyberstalker does not present a direct threat to a victim, but follows the victim’s online activity to gather information and make threats or other forms of verbal intimidation” (Jaishankar & Sankary, 2006, p.1). A potential stalker may not want to confront and threaten a person offline, but may have no problem threatening or harassing a victim through the Internet or other forms of electronic communications. One can become a target for a cyberstalker through the use of the Internet in many forms. The victim can be contacted by email, instant messaging (IM) programs, via chat rooms, social network sites or the stalker attempting to take over the victims computer by monitoring what they are doing while online. Bocij, Griffiths and McFarlane (2002) conclude that there are no genuinely reliable statistics that can be used to determine how common cyberstalking incidents occur.

Cyberstalkers can choose someone they know or a complete stranger with the use of a personal computer and the Internet. Basu and Jones (2007) remind us that growing up our parents told us not to talk to strangers, but one function of the Internet is to talk to strangers. The Internet, as a communication tool, has allowed people the freedom to search for information from anywhere and anyone in the world. Fullerton (2003) states that Internet Service Providers (ISP’s), e-mail, web pages, websites, search engines, images, listservs, instant chat relay (ICR’s) are all cyberstalking tools. Other forms of communication used to stalk a victim include cell phones; text messaging, short message services (SMS), global positioning systems (GPS), digital cameras, and spyware or fax machines. The information that is available about people on the Internet makes it easy for a cyberstalker to target a victim. With only a few keystrokes, a person can locate

information on an individual via the Internet. The types of information that can be found include e-mail addresses, home telephone numbers, bank accounts and credit card information and home addresses. Some services charge to obtain confidential information for any person that is willing to pay. Imagine a teacher posting a syllabus online to instruct students what date and time a particular class is in session. Someone that is a cyberstalker can use this small amount of information to follow the instructor to school or try to get inside the instructors home since they know when she will be in class. Thanks to search engines such as “Google,” a cyberstalker can type a person’s home or work address in and see where they live and work. Once the cyberstalker can physically see what the home or place of employment looks like the stalker can use the descriptions of the locations as a way to let the victim know they are being watched. “The fact that cyberstalking does not involve physical contact may create the misperception that it is more benign than physical stalking” (U.S. Attorney General Report, 1999, p.3) It is not uncommon for cyberstalkers to progress into offline stalkers. “If not stopped early on, some cyberstalkers can become so obsessed with a victim that they escalate their activities to the level of physical stalking (Hitchcock, 2006, p. 168). Gregorie (2001) indicates that people who do not have access to the Internet, or choose not to go online are not immune from cyber-based crimes. Databases of personal information available on the Internet can enable a person to find the necessary information to stalk or harass a victim.

Knowing the types of Internet technologies used by a cyberstalker can help with law enforcement training and setting the budget. “Understanding how offenders use the Internet to stalk victims in cyberspace can provide law enforcement officers with solutions when they encounter impediments investigating these types of cases” (D’Ovidio, 2003, p.1). A 1995 study, which involved the New York City Police Department’s (NYPD) Computer Investigation and Technology Unit (CITU), used police records to study the extent of cyberstalking. The data used in the study was gathered from reports filed by the victim along with police reports showing the progression of investigation used in a reported case. The data was collected from closed cases in which the criminal used the Internet or computer to stalk or harass a victim between January 1996 and August 2000. (D’Ovidio & Doyle, 2003).

During the NYPD study, 42.8% of the cases investigated by CITU involved online harassment. There were 192 closed cases examined for the study. Of the 192 cases, 40% of the cases were closed with an arrest; while 11% of the cases did not show enough evidence that a crime was committed. The remaining cases were closed for reasons including an uncooperative victim, transfer of a case or CITU could not find a suspect. Email was used to stalk the victims in 72% of the cases examined, followed by instant messaging 13%, chat rooms 8% and message boards 4%.

EXISTING LAWS

Stalking laws within the 50 states are relatively recent; the first traditional stalking law was enacted in 1990 in California. California’s legal definition of stalking is “any person who willfully, maliciously, and repeatedly follows or harasses another person and who makes a credible threat with the intent to place that person in reasonable fear of their safety” CAL. PENAL CODE § 646.9 (West 2009). Since California’s enactment of the

first stalking law in 1990, all 50 states and the federal government have anti-stalking laws. Most stalking cases are prosecuted at the state and local levels. Each state's stalking laws will vary in their legal definitions and the degree of penalty for the offense.

As of March 2009, 45 states have cyberstalking or related laws in place. Two of the five states without cyberstalking laws have laws pending. In 1998, only 16 states had cyberstalking and harassment laws. Cyberstalking is covered in some of the 45 states existing stalking laws. Stalking laws that are written to include forms of stalking using electronic communication devices such as email, Internet or similar transmissions cover the crime of cyberstalking. If a state's current stalking law covers forms of electronic communications that are punishable by law, a separate cyberstalking law is not required. If the stalking laws within the 50 states do not cover any forms of electronic communications such as the Internet, then a separate law should be written. For example, the Pennsylvania stalking law states:

- (1) a person commits the crime of stalking when the person either engages in a course of conduct or repeatedly commits acts toward another person without proper authority, under circumstances which demonstrate either an intent to place such other person in reasonable fear of bodily injury or to cause substantial emotional distress to such other person, or
- (2) engages in a course of conduct or repeatedly communicates to another person under circumstances which demonstrate or communicate either an intent to place such other person in reasonable fear of bodily injury or to cause substantial emotional distress to such other person. 18 PA. CONS. STAT. ANN. § 2709.1 (a)(1) and (2) (West, 2009).

As used in the definition of stalking under Pennsylvania law, "communicates" is defined as:

To convey a message without intent of legitimate communication or address by oral, nonverbal, written or electronic means, including telephone, electronic mail, Internet, facsimile, telex, wireless communication or similar transmission. 18 PA CONS. STAT. ANN. § 2709.1 (f) (West, 2009).

Under Title 18 of the United States Code, Federal Law covers threatening messages transmitted electronically in interstate and foreign commerce 18 U.S.C §875 (2009). This means that Federal law protects a person who is being threatened in Ohio via the Internet, from a person living in Florida. In these instances, law enforcement agencies will determine where the online stalking began in order to find the physical location of the stalker. If the state of origination is determined, most likely that state will have jurisdiction over prosecuting the case.

Gregorie (2001) states that cyberstalking is another phase of stalking or can be seen as stalking using technological tools. Therefore, strategies, interventions and laws that have been developed to respond to offline stalking can often be adapted to online stalking situations.

Cyberstalkers, if caught, can face criminal charges and can receive a felony, misdemeanor or summary offense for the crime. A felony is a serious crime, characterized under federal law and in many states the offense can be punishable by imprisonment in excess of one year or even death. A misdemeanor is a criminal act that carries a less severe punishment than felonies but more serious than summaries. “Misdemeanors in the U.S. generally have a maximum punishment of 12 months in jail” (Federal Defense Cases, 2007). A summary is a minor violation of the law prosecutable without a full trial. An example of a common summary would be a traffic ticket.

Walter, a 22 year-old auto mechanic, sends more than 100 emails during a two-week period to Sarah, his worse enemy at the auto dealership where he works. Each email is the same advertisement for the prescription drug Aviane, an oral contraceptive. Under Pennsylvania law, Walter can be charged with a summary charge of harassment, pursuant to Title 18, Subsection **2709(a)(3)** and **2709(c)(1)**. This subsection states that a person commits this crime if, with intent to annoy or harass the person engages in a course of conduct or repeatedly commits acts which serve no legitimate purpose. Under Pennsylvania law, the maximum penalty for a summary charge is ninety days in jail and a \$300.00 fine.

After Walter is arrested and convicted, he sends Sarah one more email with the same Aviane advertisement. This time however, Walter adds the following text in the email: “You better take this stuff because I’m gonna f*&% you up after work.” Under Pennsylvania law, Walter can be charged with a third degree misdemeanor charge of harassment, pursuant to Title 18, Subsection 2709(a)(4) and 2709(c)(2). This subsection states that a person commits this crime if he communicates to another person any lewd, lascivious, threatening, or obscene words. In Pennsylvania, a third degree misdemeanor is punishable by a maximum of one year in jail and a fine of \$2,500.00.

If Walter continues to send his latest threatening email to Sarah, he can be charged with stalking under Pennsylvania law, Title 18, Subsection 2709.1, also a misdemeanor, but of the first degree. A person commits this crime if he engages in a course of conduct or repeatedly communicates to another person with intent to place the other person in reasonable fear of bodily injury or to cause substantial emotional distress to that person. Under Pennsylvania law, a first-degree misdemeanor is punishable by a maximum of five years in prison and a fine of \$10,000.00.

If Walter is convicted of stalking, but continues to send the same or similar threatening emails to Sarah, and is subsequently arrested again for stalking, Walter will be charged with a felony of the third degree. If convicted in a Pennsylvania state court, Walter faces a maximum of seven years in prison and a fine of \$15,000.00.

According to Griffiths, Sparrow, (1997) the main problem in obtaining online stalking convictions centers around credible threat, preservation of evidence and constitutional context. A credible threat is considered to be one that would cause a reasonable person fear for their life or safety of his or her family.

Victims of cyberstalking need to obtain copies of all electronic forms of communication received from the stalker. The electronic evidence that is obtained can lead to a computer and not an individual. For example, if the stalker is using a computer in a library to send messages to a victim, the electronic trail will lead back to the computer in the library. Potentially, hundreds of people could have used that computer

between when the stalking messages were sent and when the IP address was traced to the library.

METHODOLOGY

This study examined how chiefs of police in Allegheny County, Pennsylvania deal with reported cases of cyberstalking. A quantitative methodology was selected for this research project as a means to examine reported cases of cyberstalking and how cases were being processed by law enforcement agencies in Allegheny County, Pennsylvania in 2008. The data obtained from this survey may be used to assist law enforcement agencies in developing methods and training programs to assist officers in dealing with victims of cyberstalking. A survey instrument, developed by the Allegheny County District Attorney's Office, which is the chief law enforcement agency in the county, was used to gather data from the police departments.

During September 2008, an electronic survey was administered to the Chiefs of Police in Allegheny County, Pennsylvania, using Vovici EFM Continuum. Vovici EFM Continuum, is an electronic software tool used to distribute surveys and gather data. An electronic survey was determined to be an appropriate way to obtain information from the Chiefs since the 123 agencies are geographically dispersed throughout Allegheny County, Pennsylvania. The electronic survey was delivered to the chiefs of police through e-mail. The participants were asked to take the survey as part of research that was being gathered by the Allegheny County District Attorney's office.

The researcher and a Deputy District Attorney from the Allegheny County District Attorney's office in Pennsylvania created the chiefs of police survey. Due to the hours that police officers worked it was decided to keep the survey brief so that it would not detract from the daily activities of the chiefs. The purpose of the survey was to investigate whether police departments had trained officers in the area of cyberstalking, how they handled reported cases and if the cases resulted in criminal charges. The survey was designed to determine how police departments in Allegheny County, Pennsylvania investigate cyberstalking cases. The survey was a one-page document consisting of seven questions.

After the initial electronic survey was administered, reminder e-mails were sent to encourage participation from the agencies that did not complete the survey. After three reminder e-mails were sent to the chiefs requesting that they take the survey, the District Attorney's Office called the remaining agencies and administered the survey questions by phone. At the time the phone calls were administered 63 surveys had been returned electronically. A Deputy District Attorney phoned the remaining 60 police agencies that had not responded to the electronic survey. Thirty-nine additional agencies answered the survey by phone, to reach a total of 102 participants. The survey administered over the phone was completed during the first week of October between the hours of 9:00 a.m. and 4:00 p.m. The same survey questions that were sent electronically were solicited verbally to the chiefs over the phone.

SAMPLE

According to the U.S. Census Bureau (2008), the population of Allegheny County, Pennsylvania was 1,219,210 residents in 2008. The study was taken from the entire population of 123 police departments in September 2008, in Allegheny County. A total of 102 chiefs of police responded to the survey. For this study, of the 102 police departments that completed the survey, 27 were categorized as small agencies (5-10 officers), 52 were medium size agencies (11-25 officers) and 29 were large agencies (25-plus officers). The largest department of 700 officers is the City of Pittsburgh.

RESULTS

Cyberstalking was defined as threatening behavior or unwanted advances directed at another using the Internet and other forms of online and computer communications. The U.S. Department of Justice (2001) defines cyberstalking as the use of e-mail, or other electronic communication devices to stalk another person. Cyberstalkers can target their victims through threatening or harassing email, flaming (online verbal abuse), computer viruses, chat rooms, message boards, social network sites (such as MySpace), or tracing a persons Internet activities plus many more.

The chiefs' survey asked participants if their department employs a detective or officer that can investigate an incident of cyberstalking. Of the 102 police departments that responded to the survey, only 31 departments have a person within their agency that can investigate cyberstalking crimes while 71 departments do not have a person in-house that can handle cyberstalking cases.

Research Question 1 queried whether or not the number of available officer's impacted the method used to handle cyberstalking complaints. This question asked participants how their office handles cyberstalking cases. Differences in how the police departments handled reported cases of cyberstalking include, 29 police departments investigate the allegations yet did not file charges, 57 police departments investigate the allegations and filed charges, 78 police departments referred the case to an outside agency such as the county police, state police or FBI and 21 police departments referred the case to a school or academic institution. The data revealed that 3 small police departments, 20 medium size police departments and 6 large departments investigated allegations of cyberstalking but did not file charges. After investigating the allegations, a police department may not file charges because the case revealed no evidence or the officer may have referred the matter to a more suitable department to handle the case. Spitzberg and Hoobler (2002) state that to combat cyberstalking, law enforcement may need the very tools of electronic surveillance and intrusion that are currently the source of many citizens' fundamental fears of privacy invasion. The police departments that investigated the allegations and filed charges consisted of 13 small departments, 26 medium departments and 18 large departments. Of the large departments, 86% investigated the cases and filed charges without referring the case to an outside agency. The results show statistical significance with respect to the size of a police department and the method used to investigate cyberstalking cases (chi-square = 9.546, $df = 2$, $p < .008$).

Research Question 2 addressed the current level of criminal charges on reported cases of cyberstalking, while Research Question 3 sought to determine the number of police departments that received cyberstalking complaints. Of the 102 survey responses, 38 police departments received complaints in 2008, while 64 did not receive any complaints concerning the investigation of or filing of criminal charges against an individual for cyberstalking. A total of 7 small police departments, 21 medium sized police departments and 10 large police departments received cyberstalking complaints. The police departments that received cyberstalking complaints were asked to specify the number of complaints received. The complaints received by police departments consisted of 5 departments reporting 1 complaint, 9 departments with 2 complaints, 13 departments received 3 complaints and the remaining 11 departments received more than 3 complaints with 18 being the highest number of complaints. Among the 38 police departments a total of 134 complaints were reported. There was not a statistical significance between the size of the police departments and cyberstalking complaints. Only 13 of the 134 cases resulted in a conviction of a felony, misdemeanor or summary charges. The cases that resulted in a conviction consisted of 1 felony, 5 misdemeanors and 7 summaries.

DISCUSSION

The Internet and use of electronic communications technologies have become easily accessible and are used for almost every facet of daily living throughout the world. This study found that approximately 37% of police departments in Allegheny County received cyberstalking complaints in 2008. The first research objective examined whether or not the number of available officer's impacted the method used to handle cyberstalking complaints. The entire population, 123 police departments in Allegheny County was surveyed. A total of 102 departments responded to the survey where 71 departments indicated that they do not have a person on staff to handle cyberstalking cases while 31 departments have a trained officer on staff to handle cyberstalking cases. This could possibly be due to the size of the department or funding to train officers.

Police departments were classified as small (5-10 officers), medium (11-25) officers and large (25 plus officers). The police survey revealed a significant relationship with respect to the size of the police department and the method used to investigate the cases. The police methods included investigating the allegation without filing charges, investigate the allegation and file charges, referring the case to an outside agency such as the county police, state police, or FBI or refer the case to a school or academic institution. The large departments revealed that 86% investigated the cases and filed charges. Of the small and medium sized departments, 48%, investigate the cases and file charges.

The second research objective examined the current level of criminal charges on reported cases of cyberstalking, while the third research objective determined how many police departments received cyberstalking complaints. Of the 102 survey responses, 38 police departments received complaints in 2008. The police departments were asked to specify the number of complaints received and if those complaints resulted in a felony, misdemeanor or summary charge. A total of 134 complaints were received from 38 police departments in which only 13 resulted in charges to include 1 felony, 5 misdemeanors and 7 summaries. The remaining 121 cases that did not result in criminal

charges could have been because there was not a sufficient amount of evidence to support the cyberstalking allegation or law enforcements lack of training in regard to cyberstalking. The results indicate that 7 small, 21 medium sized, and 10 large police departments received cyberstalking complaints. A total of 25 police departments were classified as small, 49 were classified as medium and 28 were classified as large indicating there were almost twice the number of medium departments compared to the small and large departments.

ADDITIONAL FINDINGS

Additional findings were discovered as a result of the statistical analysis of the collected data. Thirty-one of the 102 police departments that responded to the police survey have an officer trained within their department that can investigate cases of cyberstalking. The other departments may not have an officer trained on computer crimes due to the size of the department or budgetary restraints. A total of 134 complaints were received from 38 police departments, yet only 13 cases resulted in criminal charges. Law enforcement agencies may not have an officer trained on how to handle cyberstalking cases or the reported cases of cyberstalking lack necessary evidence for the agencies to pursue the case. The law enforcement agencies may not be equipped to handle large volumes of cybercrimes resulting in victims not receiving the help they need. According to the U.S. Department of Justice (1999) some law enforcement agencies do not have the training or expertise to recognize the magnitude of the problem in their jurisdiction. Law enforcement agencies underestimate the magnitude of cyberstalking due to the disparity in reported cases across the country.

FUTURE RESEARCH

While this present study determined relevant issues in regard to cyberstalking, the study did not examine reasons why all of the police departments did not have an officer on staff trained to investigate cyberstalking cases and did not examine the types of cases that were being reported. Future research should focus on the types of stalking that occurred and if budgetary constraints played a part in the lack of officer training.

Additional research is recommended to focus on the types of complaints that are reported to determine the severity of the crime and what methods of technology were used by the stalker.

RECOMMENED APPROACH TO CYBERSTALKING PREVENTION

Based on our years of experience working in the District Attorney's Office, working with computer forensics, and prior research indicated in the literature review, the following list can help protect a person from being a victim of cyberstalking:

1. Never use your real name, nickname or any type of suggestive name while online.

2. When online, only type things you would actually say to someone face-to-face. Think about how what you say might be interpreted without eye contact, body language or voice.
3. **THINK BEFORE YOU INK.** Remember once you send an electronic message it can remain in cyberspace indefinitely.
4. Log off immediately if you experience contact from someone that is hostile, rude or inappropriate.
5. Save all communications from the stalker as evidence.
6. Report the incident to your ISP, law enforcement agency, school administration or an online help agency such as www.haltabuse.org or www.cyberangels.org

CONCLUSIONS

Studies are needed to improve our understanding of cyberstalking. The fast pace at which technology changes, as well as the inexpensive cost of technologies make it easier for a person to track and stalk a victim. Studies based on victim experiences need to be explored in depth so that the appropriate laws are written to protect victims of cyberstalking. A collaborative effort from victims, law enforcement and private and public sectors is needed in order to combat cyberstalking and develop an effective response to this problem.

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