Stalking Technology Outpaces State Laws

Computer technology and the Internet have opened up a whole new world for stalkers. When legislators were drafting the first stalking laws in the early 1990s, few could have foreseen the current widespread use of e-mail, the Internet, chat rooms, websites, global positioning systems (GPS), cell phones, and tiny hand-held video and digital cameras to stalk. Although general stalking statutes (or harassment and related laws) in most states cover some forms of “cyberstalking,” states should review their laws to ensure that they prohibit and appropriately punish acts of stalking accomplished through current or future technology.

Use of Technology to Stalk
The World Wide Web allows stalkers easy access to personal information.

Leaving No Victim Behind

You recently ended a live-in relationship with your boyfriend. You moved to a new apartment and even started a new job in a different town. A few weeks later, you got a letter saying that he loves you and won’t let you go. Your answering machine starts blinking frantically, and your new e-mail account fills up with warnings that if he can’t have you, then no one can. One morning, tucked under the windshield wiper of your car, you find a picture of yourself with your face scratched out. You are scared. You want to tell your family but fear their reaction. You hesitate to call the police because you don’t trust them.

Spring Conference a Huge Success

The Stalking Resource Center’s first national conference, Intimate Partner Stalking: Keeping Victims Safe and Holding Offenders Accountable, focused a national spotlight on stalking. Co-hosted by the Battered Women’s Justice Project and held March 10-12 in Memphis, Tennessee, the event drew nationally recognized experts and more than 90 practitioners to the first in a series of Stalking Resource Center conferences.

Conference workshops covered a broad range of subjects related to intimate partner stalking. Topics included domestic violence and stalking, the use of technology to stalk, lethality assessment, creating a coordinated response to stalking in your community, stalking and sexual assault, stalking investigative techniques, and teen stalking. Presentations stressed practical approaches for prosecutors, judges, law enforcement representatives, advocates, social service providers, mental health experts, and tribal court judges and administrators.

Participants applauded the practical, consistently useful information offered by
Recently, the term “cyberstalking” seems to be cropping up everywhere. But no one seems to know exactly what it means. Is it stalking by computer? By hidden cameras? By e-mail? Is it cyber-stalking to use a cell phone or pager to track someone? What technologies are really covered by cyberstalking? And why should anyone care?

The law rests on the accurate use of terms. For more than a decade, advocates and legislators have struggled to define stalking and write laws to prosecute stalkers. Now that all states have passed anti-stalking laws, law enforcement professionals, as well as the public, are starting to share a common understanding of the elements and definition of stalking.

Stalking takes many forms. Stalkers can physically follow their victims. They can use phones, the U.S. Postal Service, couriers, and even florists to track and pressure their prey. Stalkers can also bombard their victims with instant messages, photograph them with hidden cameras, install surveillance software on their computers, and use global positioning systems (GPS) to track them in their cars. But no matter what tools they use, stalkers are still stalkers.

So what’s wrong with describing technology-aided stalking as “cyberstalking”? On the surface, the term seems harmless. But a closer look suggests a few problems. “Cyber” usually refers to the Internet. The term may be stretched to encompass all use of computers. But it does not cover the use of many other forms of technology. So it’s inaccurate to describe stalking with GPS or a camera as cyberstalking. Some states have passed cyberstalking statutes to cover stalking via computer-related means such as e-mail, websites, and chat rooms. But what happens when attorneys try to apply cyberstalking statutes to technology that the statutes do not address? Some confusion is inevitable.

Although most professionals now use computers, many are still intimidated by the complexity of technology. Many stalking-savvy law enforcement officers, prosecutors, or advocates hesitate to get involved in a case described as cyberstalking because they are not experts in the inner workings of a computer. The term “cyber” distracts them from what they already know about stalking laws and how to build a case. They forget that they can hire technology experts to explain how new technologies operate. What is most important for criminal justice professionals is to understand the basics and dynamics of stalking and, in general, how their state statutes address technology. Building on such a foundation, they can prosecute the ever-evolving forms of stalking with technology.

To deal effectively with technology’s impact on stalking, we, as criminal justice professionals should make sure our language is appropriate. Instead of getting hung up on cyberstalking, why don’t we just say “the use of technology to stalk”? That way, the crime is clear, and “technology” covers the host of tools the stalker can use (now and in the future) to commit their crimes. Once we’ve defined our terms, law enforcement can go back to catching stalkers, Merriam-Webster can wrestle with “cyber,” and we can all return to our computers with renewed confidence.

Tracy Bahm, Director
Stalking Resource Center
Technology Outpaces Law

While many states have laws on stalking via electronic communications, only a few have expanded their laws to cover other forms of technology-related conduct.

About their victims. Perpetrators can anonymously commit stalking by posting their victims’ personal contact information in chat rooms and on websites, encouraging third parties to harass or threaten them. GPS enables stalkers to track their victims’ every move, and computer programs allow stalkers to retrace victims’ keystrokes, capturing the documents they have written and monitoring the Internet sites they have visited.

Despite the power these tools give stalkers, it is unclear whether such actions can be prosecuted under many current state stalking statutes and other related laws. Yet in several recent cases involving the use of technology to stalk, the courts have been required to determine whether the applicable law can be interpreted to include certain types of conduct.

Recent Court Decisions

Several years ago, a Colorado man installed a GPS in his estranged wife’s car to check on her whereabouts during their divorce proceedings. A Colorado court ruled that the phrase “under surveillance” in the state stalking law included such electronic surveillance and that the husband’s behavior constituted stalking. (See Colorado v. Sullivan, 53 P.3d 1181 (Colo. Ct. App. 2002)). More recently, a Wisconsin man who had used the same tool to follow his ex-girlfriend pleaded no contest to the charge of misdemeanor stalking and is awaiting sentencing.

In a 1999 New Hampshire case, after purchasing his victim’s personal information from an information broker, a stalker set up a website that published references to stalking and killing his victim, whom he fatally shot several months later. (See Remsburg, Administratrix for the Estate of Amy Boyer v. Docusearch Inc., 2003 NH LEXIS 17 (NH 2003)). The court recently held that because of the risk of stalking and identity theft, information brokers may be held liable for the sale of such personal information.

In most of these cases, the courts rejected the stalkers’ argument that their conduct did not fall under the state stalking laws. The question remains however, whether the courts will make the same kinds of rulings about each new form of technology.

Status of the Law

All fifty states have stalking laws. Roughly one-third of the states have incorporated into their stalking statutes language relating to stalking through electronic means. General harassment statutes in some states prohibit harassing electronic communications. A handful of states have enacted separate cyberstalking laws. A number of other states have created a variety of other specific offenses, such as harassing communications, unlawful computerized communications, harassment through electronic communications, misuse of electronic mail, and obscene electronic communications.

Electronic Communications Laws

Most of these laws emphasize electronic communications to the exclusion of other types of stalking through electronic means. To cover all possible communications tools that stalkers might use, some states’ statutes include long lists of examples of such devices. The danger of adopting this tactic is the potential for omitting other means that would fall under the statute. A better approach is to keep such lists open-ended. Legislators may insert the phrase “including, but not limited to” before a list of examples to ensure that the law will apply to all newly developed forms of communication. They can also use a catchall phrase intended to make a stalking law all-inclusive (e.g., “makes any form of communication with another,” “threats conveyed by any other means of communication, or “otherwise communicating”).

Electronic Conduct Laws

While many states have laws on stalking via electronic communications, only a few have
In the Winter 2003 issue of this newsletter, we invited you to vote on our website on whether upskirting constituted stalking behavior. As of the end of May, we received 323 votes. The result is a virtual tie, with 164 of respondents (51 percent) voting that upskirting is stalking, and 159 (49 percent) voting that it is not.

A note from the Stalking Resource Center:
Whether upskirting constitutes stalking in any particular situation depends upon the specific facts of that situation and the laws of the state where the conduct occurs. For a complete list of state stalking laws please visit: www.ncvc.org/src.

Technology Outpaces Law
expanded their laws to cover other forms of technology-related conduct, such as surveillance, following, and videotaping, as well as communications. California’s stalking statute requires that to be classified as stalking, the course of conduct must include making a credible threat with the intent to place the victim in reasonable fear for his or her own safety. The term credible threat is defined in part as “a verbal or written threat, including that performed through the use of an electronic communication device, or a threat implied by a pattern of conduct or a combination of verbal, written, or electronically communicated statements and conduct.”

Other states including Kansas, Louisiana, and Massachusetts have laws containing similar language.

Laws Using Broad Language
Still other states have used even broader, more open-ended language that may be interpreted to cover technology, both current and future. Under Montana law, an individual who harasses, threatens, or intimidates his or her victim “in person or by mail, electronic communication...or other action, device, or method” commits the crime of stalking.

In Virginia, a person stalks another when he or she “engages in conduct directed at another person” when he or she knows or reasonably should know that the conduct will cause the victim fear. Though subject to case-by-case court interpretation, such language allows the state to argue that any conduct, electronic or otherwise, that causes a reasonable person to be afraid should be recognized as stalking. Open-ended language is useful if it is not so broad that it invites challenges to the law’s constitutionality.

Posting Electronic Messages
A few states have addressed the use of technology by stalkers who post personal information about their victims online, encouraging others to contact them for illicit purposes. Michigan passed a statute specifically to prohibit a person from “posting a message through the use of any medium of communication, including the Internet or a computer, computer program, computer system, or computer network, or other electronic medium of communication to publish, display or distribute information in a manner that substantially increases the risk of harm or violence to the victim.”

Questions to Ask About Your Laws
Stalking laws should define the conduct that constitutes stalking as broadly as possible without being unconstitutionally vague. States reviewing their stalking, harassment, and related statutes should ask themselves three questions: Will the language used in the law cover all conduct and communications that future advances in technology may generate? Does the law require or imply the need for direct physical contact between the perpetrator and the victim, or can electronic monitoring and surveillance be considered stalking? Does the law cover third-party contact initiated by the stalker?

Conclusion
Protecting victims from all kinds of stalking and holding offenders accountable for their behaviors are important goals of stalking laws. States should look at their stalking, cyberstalking, and other related laws to ensure that their citizens have the same protection from stalkers who use computer spyware or video cameras as they do from those who physically follow, harass, or threaten them.

If you or your communities are working on these issues, or would like assistance with this or any other stalking matter please contact us at 202-467-8700 or e-mail src@ncvc.org.
**Legislative Update**

**Montana**

H.B. 53 amends the existing statute concerning who must notify the stalking victim when the defendant is released from law enforcement custody. The bill mandates that the detention center (instead of the court) notify the victim of the defendant’s release. This bill was signed by the governor on February 13, 2003.

H.B. 54, enacted into law on April 16, 2003, broadens the state stalking law to include electronic communication as a method of stalking. The bill also amends the privacy in communications law to include electronic communications. In this law, electronic communications are defined as “any transfer between persons of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or part by a wire, radio, electromagnetic, photoelectronic, or photo-optical system.”

**New Mexico**

S.B. 339, signed by the governor on April 8, 2003, amends a section of the state’s Victims of Crime Act (which protects the legal rights of crime victims) to expand the definition of “criminal offense” to include stalking and aggravated stalking. This bill becomes effective on July 1, 2003.

**Pennsylvania**

On December 9, 2002, Pennsylvania legislators passed S.B. 1515, which repealed the joint stalking and harassment law and created two separate statutory sections for the offenses. In the harassment sections, the bill adds a definition of “communicates” and specifically includes communications by electronic means, including the telephone, electronic mail, the Internet, and facsimile. A separate stalking offense was added in a following section. The bill defines the offense to include communications that are electronic. The bill also specifies that an offense can be committed at the place at which the communication was made or the place where it was received. The act took effect on February 9, 2003.

**Virginia**

S.B. 834, enacted into law on March 16, 2003, mandates that the court shall, when imposing a sentence for violating a stalking protection order, also enter a protective order for a specified period of time not to exceed two years from the date of conviction.

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**Technology Outpaces Law (Cont.)**

1 For example, using a global positioning system to follow the victim’s movements and keep track of where they are and where they are going.

2 Cal. Penal Code § 646.9 (Deering 2003).


Leaving No Victim Behind

that the number might be higher.\(^{1}\) The most comprehensive study on stalking found that “stalking prevalence [was] significantly greater among men who had ever lived with a man as a couple compared with men who had never lived with a man as a couple.”\(^{2}\) Urban gay men are as likely to be battered as heterosexual women, another recent study concluded,\(^{3}\) and some of those men may be stalked once they leave the relationship.

Victims of same-sex intimate partner stalking are often afraid to come forward and seek assistance. They may fear that they will be “outed,” that their homosexual orientation will be disclosed. Victims have to tell the police about their relationship with the offender; for closeted victims, such disclosure may endanger their relationships with family members, friends, landlords, coworkers, or employers. Outed homosexuals sometimes lose their jobs and homes, as well as custody of their children simply because they are gay. Abusers can also use the threat of outing the victim as a tool of manipulation and control.\(^{4}\)

Another reason gay and lesbian victims fear coming forward is that they are reluctant to admit that their relationships might be unhealthy and abusive. Such admissions might provide ammunition for those who denigrate and persecute gays.\(^{5}\) Gay and lesbian domestic violence and stalking victims also fear that publicly disclosing their victimization suggests that their communities condone abuse. They fear that such misconceptions jeopardize their community’s recent progress toward attaining their civil rights. This conflict presents real challenges to gay and lesbian victims. Matt Markon, a program attorney of the Stalking Resource Center, and a former police officer, recalled, “I remember a case where the victim was a lesbian. She was a politically active feminist and was ashamed about being a victim. She felt she had worked so hard to show lesbian relationships as an ideal that was free from what we traditionally think of as male power dynamics. In her mind, coming forward would betray the lesbian community, so she was caught between her ideals and her safety. It was a tough choice for her.”

A third reason some same-sex stalking victims hesitate to come forward is their belief that public authorities are biased against gays. Victims may remember that before the Stonewall riots of 1969, when gays challenged police harassment at a gay bar, police routinely raided gays’ and lesbians’ businesses. The long history of police harassment, aimed at entrapping and arresting people for publicly displaying affection, still colors gays’ perception of public authorities.\(^{6}\) Gays also know that the police response to hate crime against them is sometimes negative or even abusive.\(^{7}\) These experiences explain why many gays and lesbians still mistrust authorities despite recent efforts of some police departments across the country to improve their relationships with the gay community.

A few victim services projects are starting to address these issues. In New York City, for example, two key organizations joined forces to provide specialized services for gay and lesbian victims of intimate partner abuse. Safe Horizon, the largest victim service provider in the city, and the Anti-Violence Project (AVP), which serves sexual minority victims of partner abuse and hate crime, recently opened a shelter for gay male victims of domestic violence. The facility, an apartment in a domestic violence shelter, has housed four men since it opened in February 2003, says Allegra Perhaes, Safe Horizon’s associate vice president. Stalking victims housed by the shelter have access to the extensive network of services offered through Safe Horizon’s antistalking unit.

Another promising program is the Gay Men’s Domestic Violence Project in Cambridge, Massachusetts, founded in 1994 by Curt Rogers, a gay survivor of domestic violence. Rogers launched his program after mainstream domestic violence programs denied him services. In addition to providing emotional support, crisis counseling, and safety planning, the Project offers a network of safe homes in private residences, made available by the owners as emergency housing for up two weeks. The Project has reciprocal relationships with several mainstream domestic violence organizations in the state, as well as a partnership grant with the Boston Police Department to conduct cultural awareness training at
the city’s police academy. Gay victims of intimate partner stalking can take advantage of safety planning, as well as court and legal advocacy provided by the Project’s staff.

Although most communities don’t have specialized services for gay and lesbian victims, most providers will encounter gay and lesbian victims of intimate abuse at some point. Victim service programs can take several steps to welcome and improve their response to this population:

- Do not presuppose that the victim is female or the offender male or that the relationship is heterosexual—use gender-neutral intake language.
- Reassure victims that you will do your best to protect their confidentiality.
- Coordinate with other victim service providers in the area to maximize the efficiency of the response and spare the victims from repeated requests to recount their stories.
- When preparing safety plans for gay and lesbian victims, service providers should remember that family members, friends, or coworkers who don’t know about or accept the victim’s sexual orientation may not be suitable helpers.
- Find out if protection order laws in your state cover same-sex partnerships; if not, you should seek other types of legal redress.

To respond successfully to this population, victim service providers need to seek resources from currently effective programs, develop policies, and train their staffs.

Same-sex stalking victims fear both the stalker and the discrimination they may face in seeking help. Programs that seek sound approaches for serving this population reduce the barriers between these victims and the help they need. They also make their communities safer for everyone.

The Stalking Resource Center would like to hear from providers who have established programs that offer services (e.g., support group, shelter, counseling, court advocacy) for same-sex intimate partner victims or have discovered ways to provide services to these victims. We are eager to learn of the good work you do. E-mail us src@ncvc.org or call 202-467-8700.

7 Ibid.
Research update

Most Stalking Cases Dismissed, Study Shows

According to a study recently published in the Journal of Interpersonal Violence, most stalking cases in Kentucky are dismissed, and most individuals charged with stalking in the state had previous criminal histories or protective orders against them.

The study sample included 346 men charged with stalking in Kentucky prior to and during the fiscal year 1999. Female offenders were excluded from the analysis because the number was so low (11 percent). Sixty-four percent of the men were charged with misdemeanor stalking, and the remaining thirty-six percent were charged with felony stalking.

The study’s most striking finding is that more than one-half of all stalking charges were eventually dismissed (see Figures 1 and 2 below). Of the cases originally charged as misdemeanor stalking, 29 percent were convicted (on original or amended charges) and of those originally charged as felony stalking, 33 percent were convicted (on original or amended charges). Additionally (for reasons the study describes as unknown), 28 percent of felony charges were eventually amended to a lesser offense; of those, 66 percent were reduced to misdemeanor stalking. The rest of these charges were most often amended to terroristic threatening and protection order violation. In contrast, of misdemeanor charges, only seven percent of charges were amended, most frequently to terroristic threatening, disorderly conduct, or menacing.

Many of those charged with stalking had prior criminal histories, prior protective orders against them, or both (see Table 1).

<table>
<thead>
<tr>
<th>Persons Convicted on Original Stalking Charges</th>
<th>Persons Convicted on Reduced Stalking Charges</th>
<th>Persons Whose Cases Were Dismissed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Had Prior Criminal History</td>
<td>41%</td>
<td>8%</td>
</tr>
<tr>
<td>Had Prior Protective Orders Against Him</td>
<td>65%</td>
<td>38%</td>
</tr>
</tbody>
</table>

Table 1

Editor’s Note:
The study’s results need to be considered in light of the study’s limitations. First, this research reflects only data from Kentucky and does not apply to other states’ criminal processing of stalking cases. Second, only those cases that were reported to law enforcement and subsequently resulted in an arrest were considered. Finally, the reasons for amending stalking charges to a lesser offenses are unknown.


Spring Conference a Huge Success

conference presenters. Mark Wynn, a former police lieutenant from Nashville, Tennessee, won praise for his “user-friendly” discussion of domestic violence and stalking, which focused on the lethality of stalking, common stalker profiles, and effective law enforcement approaches and tactics. Cindy Southworth, director of technology for the National Safe & Strategic Technology Project, presented an extensive survey of new technologies used by stalkers and proposed strategies for helping victims and protecting evidence. The lively interaction and practical relevance of these and other presentations won enthusiastic comments and high marks from participants.

Given the success of this event, the Stalking Resource Center will host another conference on intimate partner stalking in Portland, Oregon, August 13-15. Among the featured topics will be investigating and prosecuting stalking, the victim’s perspective, the use of technology to stalk, stalking in Native American communities, and many other topics from the Memphis conference. Those who were unable to register for the last conference will have the first opportunity to register. For more information, check the Stalking Resource Center website, www.ncvc.org/src, or call Jen McLish at (202) 467-8749.
Intimate Partner Stalking: Keeping Victims Safe & Holding Offenders Accountable


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For more information or to register, contact Jen McLish at 202-467-8749, or JMcLish@ncvc.org, or log on to www.ncvc.org/src

What participants at our March 2003 Conference had to say:

“The staff were some of the best I have ever seen!”
“I learned lots of new information.”
“I just wish I had this two years ago when I started the domestic violence unit.”

Sponsored by:
Recent Stalking Case Law

H.E.S. v. J.C.S., 815 A.2d 405  
(NJ 2003)
The Supreme Court of New Jersey found that the defendant’s video surveillance of the victim (his estranged wife), in her bedroom presented a *prima facie* case of stalking and harassment under the NJ Domestic Violence Act. The defendant acted “purposefully or knowingly” against a “specific person.” He “repeatedly maintained a visual proximity” to the victim. Based on the prior history of violence and threats, a reasonable person in the victim’s situation, knowing what the victim knew about her estranged husband, would have feared bodily injury as a result of the defendant’s conduct. This case was remanded on due process grounds, but the finding of stalking was affirmed.

New Hampshire’s highest court concluded that because of the threats posed by stalking and identity theft, the risk of criminal misconduct is sufficiently foreseeable that an investigator has a duty to exercise reasonable care in disclosing a third person’s personal information to a client. The victim in this case was being stalked by a man who obtained her personal information through an information broker, the defendant in this case. Her stalker bought her birth date, her social security number, and her employment address from the information broker. The stalker had previously set up a web site detailing his plans about stalking and killing the victim. After he obtained this personal information he drove to the victim’s place of employment and fatally shot her, then shot and killed himself. The court held the information, broker may be held liable for releasing the victim’s personal information to a third person.

The appeals court held that there was sufficient evidence to support the defendant’s conviction for aggravated stalking. The victim’s prior inconsistent statement to the investigating police officer was admissible and, in addition to the officer’s testimony about the injuries he observed, there was sufficient evidence to find the defendant guilty beyond a reasonable doubt.

The court affirmed the defendant’s conviction of stalking in the second degree and the stalking statute’s constitutionality. The appeals court found that the state presented sufficient evidence to demonstrate that the defendant followed the victim, made threatening comments about her, frequented her business parking lot to frighten and intimidate her, and took deliberate steps to demonstrate that he was in possession and control of a shotgun.

Montana v. Tichenor, 60 P.3d 454, 313 Mont. 95 (MT 2003)
The Supreme Court of Montana upheld the defendant’s stalking conviction. The court found that the prosecutor properly exercised her discretion in charging two counts of stalking, in two distinct charges, instead of one count. Between November 11 and 16, 1999, after being ordered by the court not to have any contact with the victim, the defendant called her a total of 69 times. The defendant committed a second offense of stalking when, following his arrest on November 23, 1999 for violation of the no-contact order, he repeatedly harassed the victim by phone and mail from the county jail. The defendant’s conduct was broken by his arrest, by time, by the circumstances under which the conduct occurred, and by the intensity of his conduct after the arrest.

The court held that the order prohibiting the defendant from entering Walworth County was properly tailored to prohibit future harassment of the victims and did not unduly impinge on the defendant’s constitutionally protected activities. The defendant had been stalking the victims for about 10 years and had ignored previous orders to have no contact with the victims. The court stated that the defendant posed a constant and dangerous threat any time she was in the county and the victims deserved to live their lives free from the constant fear of being tormented and attacked.
Recent Case Law Continued

The court of appeals held that the trial court did not abuse their discretion in issuing a protection order against the defendant because the order was supported by competent, credible evidence. The court also found that the evidence did not support the condition requiring the defendant to turn over his firearms to the local authorities. The provision of the protection order requiring the defendant to turn over his firearms was not reasonably tailored, or designed for, this set of circumstances. The court declined to address constitutional issues associated with the right to bear arms.

Based on the defendant’s continual contact with the victim despite an existing stalking civil protection order, the defendant’s past behavior, and the victim’s testimony indicating she was in fear, the court held that the trial court did not err in extending the terms of the stalking civil protection order. The defendant admitted to continuing to call the victim and going to her home and this behavior was clearly in violation of the civil protection order.

The court ruled that the final restraining order issued by the lower court was valid because the victim was a person protected under the Prevention of Domestic Violence Act. Even though the dating relationship between the defendant and the victim ended three years prior, there were continued unwanted contacts initiated by the defendant that demonstrated a continuing emotional attachment on the defendant’s part and an effort to control the victim’s behavior and to harass her.

Promising Practices

The Stalking Resource Center is compiling a list of the most promising stalking-related law enforcement practices from around the nation. This list, the first of its kind, will feature proven solutions and practical approaches to problems commonly faced by law enforcement in responding to stalking.

The goal is to highlight law enforcement practices that improve victim safety and hold offenders accountable. The list will be a comprehensive resource to identify present and emerging trends in practice, as well as to develop policies based on proven, effective strategies.

Upcoming newsletters and the Stalking Resource Center’s website will highlight the promising practices we find and the law enforcement agencies that use them. If you know of a program that you would like to see featured, please contact Matt Markon at mmarkon@ncvc.org.
New from the Stalking Resource Center:

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