

Adolescent Stalking: offence characteristics and effectiveness of criminal justice interventions

Rosemary Purcell
Teresa Flower
Paul E Mullen

Report to the Criminology Research Council
Grant: CRC 06/05-06

November 2008

**ADOLESCENT STALKING: OFFENCE CHARACTERISTICS AND
EFFECTIVENESS OF CRIMINAL JUSTICE INTERVENTIONS**

FINAL REPORT TO THE CRIMINOLOGY RESEARCH COUNCIL

GRANT: CRC06/05-06

November, 2008

Rosemary Purcell, PhD¹

Teresa Flower, M.B.Ch.²

Paul E Mullen, DSc²

¹ ORYGEN Research Centre, Department of Psychiatry, The University of Melbourne, Victoria

² Monash University & Victorian Institute of Forensic Mental Health, Victoria

TABLE OF CONTENTS

	Page
EXECUTIVE SUMMARY	5
ACKNOWLEDGEMENTS	6
INTRODUCTION	7
Defining Stalking	7
The How and Why of Stalking	8
Stalking in Juveniles	9
Aims and Rationale of the Current Research	10
PROCEDURE	11
Ethics Approval	12
Definitions	12
Data Analysis	13
RESULTS	13
Intervention Order Applications	13
Juvenile Stalking Cases	13
Defendant Characteristics	13
Victim Characteristics	13
Nature of the Prior Relationship between Victim and Defendant	14
Methods and Duration of Stalking Behaviours	14
Threats and Assaults	15
Context and Motivations for the Defendant's Behaviour	15
The Impacts of Juvenile Stalking on Victims	18
Outcomes of Intervention Order Applications in Juvenile Stalking Cases	18
Family Violence Cases	18
Defendant Characteristics	18
Victim Characteristics	19
The Nature of Family Violence	20
Context of Family Violence IO Applications	20
Outcomes of Intervention Order Applications in Family Violence Cases	21
Comparison between Stalking and Family Violence Cases	22
Threats and Assaults	22
Outcomes of Intervention Order Applications	23

DISCUSSION	23
Juvenile Stalkers	24
The Motivations for Juvenile Stalking	25
Family Violence	27
The Utility of Intervention Orders for Managing Juvenile Stalking and Family Violence	28
Study Limitations	29
Conclusions	29
Recommendations	30
REFERENCES	31
Tables and Figure	
Table 1: Frequency of Stalking Behaviours	14
Table 2: Defendant and Victim Characteristics and Stalking Behaviour according to Motive	17
Table 3: Living Arrangements of Defendants in Family Violence Cases	19
Figure 1: Rates of Threats and Assault according to Stalking and Family Violence Cases	23

EXECUTIVE SUMMARY

Background

Stalking occurs when a person repeatedly intrudes on another to such an extent that the recipient fears for his or her safety. Current social and scientific constructions of stalking are limited by the almost exclusive focus on this behaviour as a form of adult-only violence. Case studies suggest that stalking is a behaviour both perpetrated by, and inflicted upon, children and adolescents. Despite this emerging evidence, no empirical studies have considered the nature of juvenile stalking.

This study was designed to examine the nature and contexts of stalking by juveniles and to assess the effectiveness of intervention orders (IO) to curb this behaviour. In the Victoria, cases of stalking involving a juvenile perpetrator are managed by the Children's Court, usually via applications for an IO. Applications can be made either under the Victims of Stalking or Family Violence provision of the Crimes Act. Intervention orders are recommended to victims by police and court staff as a first-line approach to managing stalking behaviours, as the Victorian anti-stalking law requires proof that the perpetrators' unwanted intrusions are *intentional* (Crimes Act, 1958). The breach of an IO therefore provides in theory the basis for establishing intent for any potential future criminal prosecution of stalking.

Procedure

The sample was obtained by an archival search of the court records of consecutive applications for an IO against a juvenile aged 18 years or less in the Children's Court in the Australian state of Victoria between January 1, 2004 and November 30, 2006. Information regarding the characteristics of the defendant and applicant were systematically extracted from case files, along with details of the defendant's unwanted behaviour, and whether the order was granted and subsequently breached.

Results & Discussion

There were a total of 906 applications for an intervention order against a juvenile defendant during the study period. Of these, 33.1% (299) met the study criteria for stalking and 48.3% (n=438) of applications involved family violence perpetrated by a juvenile.

Among the stalking cases, the majority of perpetrators were male (64%) and their victims predominantly female (69%). Most pursued a previously known victim (98%), favouring immediate and direct means of contact via unwanted approaches (76%) and telephone calls or text messaging (67%). Threats (75%) and physical and sexual assaults (54%) were common. The contexts in which juvenile stalking emerged included as an extension of bullying (28%), retaliation for a perceived harm (22%), a reaction to rejection (22%), sexual predation (5%) and infatuation (2%). These motivational categories significantly differentiated both aspects of the defendants' characteristics and their methods of stalking. In 48% (145) of juvenile stalking cases the IO application was granted. Nine defendants (6%) were subsequently charged with breaching an IO in the Children's Court.

In the family violence cases, the majority of defendants were male (69%) and most applicants female (77%). The victim was usually the defendant's parent (79%) or sibling (11%). Family violence cases predominantly involved property damage (62%), assault (59%) and threats (53%). The most common context for family violence involved longstanding behavioural problems in the defendant (49%), however intimidation, retaliation, mental health issues, drug-related problems and sexual predation were other motivations. In 43% of

family violence cases the IO application was granted, and 35 defendants (18.5%) were subsequently charged with breaching an IO.

This is the first empirical study to systematically examine stalking behaviour in young perpetrators. The results indicate that juvenile stalking is characterized by direct, intense, overtly threatening, and all too often violent, forms of pursuit. The seriousness that is afforded to adult forms of stalking should similarly apply to this behaviour among juveniles given the even greater potential for disruption to the victim's life and the risks of being attacked.

Recommendations

Further research

1. Systematic research into the mental health, social and vocational impacts of stalking in juvenile victims is required.
2. Research into the reasons why IO applicants discontinue their cases, along with examination of how these factors can be addressed.
3. Longitudinal follow-up of samples of juvenile stalkers and family violence offenders in order to ascertain their rates of offending in adulthood.
4. Additional research to compare (a) recidivism rates amongst defendants who receive a IO and those who do not and (b) investigation of the impact of legal consequences for breaching an IO (eg. probation or a good behaviour bond) on recidivism rates.

Policy Development

5. Given the frequency with which juvenile stalking occurs within the school environment, there is a need for greater awareness in schools of the seriousness and potential impacts of this behaviour, and the development and implementation of policies for effectively managing this conduct.
6. Development of an early intervention paradigm in the clinical and judicial management of juvenile stalkers and family violence offenders.

Acknowledgements

The authors gratefully acknowledge the support of Grant CRC06/05-06 from the Criminology Research Council. We also wish to thank Leanne De Morton, Melbourne Children's Court, for her assistance throughout this project, and Dr Bridget Moller for conducting the file review and data entry.

The views expressed in this report are the authors' and do not necessarily represent those of the CRC.

INTRODUCTION

Stalking has emerged since the early 1990s as a form of human behaviour which commands not only considerable public attention, but is increasingly attracting the interest of the police, the courts and mental health professionals (Mullen, Pathé & Purcell, 2008). The term stalking describes a constellation of behaviours in which one person repeatedly imposes on another unwanted contacts and/or communications to such an extent that the recipient fears for his or her safety. Considered individually, the behaviours associated with stalking may seem innocuous or inoffensive, for example, making phone calls, sending gifts or waiting nearby a person's home or workplace. When such acts are repeated over time, however, they can become more ominous for the recipient and potentially constitute a damaging form of victimisation.

Defining Stalking

Despite numerous attempts by researchers and legislators to define stalking, there is no single, agreed-upon definition. This arguably reflects the fact that stalking is not a homogenous behaviour. The behaviours associated with stalking overlap with other experiences which, however unwelcome and irritating, are nonetheless relatively commonplace, such as pursuing a person for a date, or attempting to reconcile a lost relationship. While stalking has been proscribed as a criminal offence in most English-speaking nations, including each Australian State and Territory, the framing of these laws have been troubled by the issue of defining a criminal activity that comprises a series of actions that, taken individually, may constitute legitimate behaviour (Purcell, Pathé & Mullen, 2004a). In response to this dilemma, anti-stalking laws in most jurisdictions refer to an intentional course of conduct involving intrusions or harassment of an individual that causes fear. 'Course of conduct' has subsequently been interpreted or explicitly defined as involving intrusions on *two or more* occasions (Saunders, 1998). These regulations appear to be responding to the concern that requiring a greater number of prohibited acts may leave victims vulnerable to an escalation to violence before the necessary elements of the offence have been fulfilled. Since stalking is often constructed as a harbinger of violence, such a broad rendering of the behaviour enables in theory a swift response to the first signs of risk.

This legislative approach defines a course of conduct, but offers no temporal limits to the behaviour. The hopeful suitor who calls over the course of several days potentially enters the ranks of the stalker, if the recipient perceives the behaviour as threatening. Similarly, the disgruntled co-worker or neighbour who attempts to resolve a dispute via several letters, approaches or phone calls. Legally, such interactions could be conceived as stalking, so long as the conduct is performed on more than one occasion and elicits fear.

Research suggests that the overarching term stalking encompasses at least two separable problem behaviours (Purcell, Pathé & Mullen, 2004b). The first type consists of a short burst of intense harassment which produces apprehension or fear in the victim. This type of brief harassment lasts only a few days and strangers (75.5%) and acquaintances (9.4%) figure prominently among the perpetrators. These bursts of harassment usually arise from either inept attempts to start a relationship, or are expressions of anger at some supposed slight or injury. The second pattern is characterised by extended, unwanted intrusions typically lasting for many months. This is usually perpetrated by ex-intimates, disgruntled work colleagues or neighbours. In these more extended episodes of stalking, unwanted communications are more prominent, as are threats and violence. The watershed between the lesser and more damaging forms of behaviour is the continuation of the intrusions beyond a period of two weeks.

The How and Why of Stalking

Stalking is a prevalent crime in Western industrialised countries, affecting an estimated 10-15% of adults (Australian Bureau of Statistics, 1996; 2005; Tjaden & Thoennes, 1998; Budd & Mattinson, 2000; Purcell, Pathé & Mullen, 2002). These epidemiological studies indicate that the majority of victims are female (75%) and most perpetrators are male (80%). Victims are typically stalked by someone previously known to them (80%), including ex-intimate partners, acquaintances, estranged relatives and friends, and work peers or clients. Few studies have considered risk factors associated with stalking victimisation, although age and gender have emerged as significant predictors. Using data from the British Crime Survey, Budd and Mattinson (2000) found women aged 16-19 years reported the highest annual rates of victimisation, with 17% having been stalked in the 12 months prior to the study. This suggests that stalking is a significant problem for young people, particularly females.

Stalking is characterised by repeated and prolonged victimisation. Victims are exposed to multiple forms of harassment, including unsolicited phone calls, letters or email, intrusive approaches, following and loitering (Pathé & Mullen, 1997; Purcell et al, 2004b). Associated behaviours are not uncommon, including property vandalism, threats to harm the victim or their loved ones and physical and sexual assaults. Violence is strongly associated with the nature of the prior relationship between stalker and victim, with ex-intimate partners exposed to the highest rates of threats and physical and/or sexual assault (Schwartz-Watts & Morgan, 1998; Mullen et al, 1999; Palarea et al, 1999; Farnham, James & Cantrell, 2000). Stalking is productive not only of significant emotional damage to victims (Pathé & Mullen, 1997; Hall, 1998; Kamphuis & Emmelkamp, 2001; Purcell, Pathé & Mullen, 2005), but is also frequently associated with psychopathology in the perpetrators (Meloy & Gothard, 1995; Harmon, Rosner & Owens, 1998; Mullen et al, 1999).

The overriding aim of stalking is to impose one's presence where it otherwise would not exist. Mullen et al (1999) classified stalkers into five groups, based on the motivation for the pursuit, the nature of the prior relationship between the stalker and victim and the stalker's psychiatric status. The five types are:

1. The *rejected*, who commence stalking after the termination of a close relationship. The purpose of the stalking is to reconcile with the lost partner, or to exact revenge for the rejection. Most rejected stalkers pursue ex-intimate partners, but on occasion this behaviour may occur in the context of a failed business partnership or broken family relationship. These stalkers have a high propensity for threats and violence and use a plethora of methods to intrude on their victim for extended periods of time.
2. The *intimacy seeker*, whose stalking is aimed at establishing a loving union with someone who has engaged their affections and who they often mistakenly believe already reciprocates their feelings. Intimacy seekers have high rates of serious mental disorder, and are among the most persistent of stalkers.
3. The *incompetent suitor* is also seeking a relationship, but in contrast to the intimacy seeker, these individuals are not in love, but merely looking to establish initial contact. Incompetent suitors usually lack basic interpersonal, let alone courting, skills and are largely uninterested in the victim's wishes in the matter. This group will abandon the stalking if confronted, but are prone to serial patterns of harassment when a new target attracts their interest.
4. The *resentful*, whose stalking emerges from a desire for retribution for some actual or supposed injury. These stalkers aim to frighten and distress their victim and their behaviour is sustained by the sense of power and control which the stalking

provides. They are the most likely of all stalkers to threaten their victims, but infrequently proceed to an assault.

5. The *predatory*, whose pursuit is preparatory to launching an attack, usually sexual in nature. The stalking is a combination of information gathering, rehearsal in fantasy and intrusion through surreptitious observation.

This typology has proved useful in not only predicting the duration and methods of stalking, as well as the likelihood of escalation to threats and assault, but the responses of stalkers to legal and clinical management strategies (Mullen et al, 1999; 2000).

Stalking in Juveniles

Current social and scientific constructions of stalking are limited by the almost exclusive focus on this behaviour as a form of violence perpetrated only by adults. Case studies (e.g. Urbach et al, 1992; McCann, 2000; 2001; Brewster, 2003) suggest that stalking is nonetheless a behaviour both perpetrated by, and inflicted upon, children and adolescents. Despite this emerging evidence, no empirical studies have examined the nature of stalking by juveniles.

The lack of scientific and popular attention to juvenile stalking may be explained in part by the common misconception that, by virtue of their age and development, children and adolescents are incapable of engaging in behaviours as egregious as stalking. Given the evidence of serious and even lethal offending among juveniles this seems naïve (Scott, 1999). Many of the motivations for stalking that operate in adults are just as apparent in young people, such as dealing with disputes among friends or school peers and initiating or terminating relationships. Negotiating the coming together and breaking apart of intimate relationships is a challenge for many adults, let alone juveniles, who are likely to be struggling with their first romantic or sexual entanglements. Teenagers in most developed English-speaking countries are now increasingly sexually active from a young age (Rissel et al, 2003) and navigating such intimate relationships provides fertile ground for stalking behaviours to emerge (eg. Jason et al, 1984; Emerson et al, 1998; Cupach & Spitzberg, 1998; Langhinrichsen-Rohling et al, 2000; Haugaard & Seri, 2003).

McCann's (2000; 2001) influential work on adolescent stalkers provided the first indication of the potentially serious nature of this behaviour and challenged the notion that juvenile stalking represents little more than 'teenage infatuation gone awry'. Drawing on legal case reports, mental health evaluations and media articles published in the United States, McCann (2000) assembled 13 cases of juvenile stalkers in order to characterise, albeit in a preliminary manner, the context and nature of stalking activities in young perpetrators. The age of this sample ranged from nine to 18 years, with all but one of the perpetrators male, and all but one of the victims female. Adults were pursued in seven cases (including three strangers) and six involved the stalking of peer-aged victims. Not surprisingly given the method of sampling, clinical diagnoses were noted in seven of the 13 cases, in most instances conduct disorder (n=4) or psychosis (n=2).

The young perpetrators in McCann's (2000) sample typically confined their stalking activities to seeking physical proximity to their victims (usually involving overt sexual advances) and making repeated phone calls. The broader range of stalking behaviours observed in adult perpetrators was not observed here, although the rates of threatening (61%) and physically violent conduct (31%) were similar to those reported in adult samples (McEwan, Mullen & Purcell, 2007). The primary motivation for stalking in this series was the desire for "sexual contact" with the victim, followed by revenge and resentment. These juveniles typically pursued known acquaintances (61%), such as classmates and teachers, although three pursued strangers, and one teenager reportedly stalked his parent. Only one case involved

the stalking of an ex-intimate partner. McCann (2000) contrasted the nature of the prior relationship in this young sample with adult stalkers, who are far more likely to target prior intimates. McCann (2001) attributed this difference to developmental variation, arguing that emerging sexual feelings in adolescents predispose them to fixate more on casual acquaintances than prior intimate partners. It is not clear, however, why this would produce such a distinction, particularly since actual – rather than merely hoped for - sexual intimacy is increasingly common in adolescents.

While McCann's (2000) research provides a glimpse of the motivations for, and methods of, stalking among juveniles, the small and selective sample prevents meaningful generalisations. The sample likely represents the extreme end of the stalking spectrum, with the perpetrator's behaviour being sufficiently damaging or disordered in each instance to warrant mental health or criminal justice intervention (or worse, media attention). Nonetheless, his findings indicated that stalking in juveniles does occur and can be motivated by factors which operate in adult perpetrators (intimacy seeking, revenge, rejection). The frequency of overt sexual advances in this sample is notable however, perhaps pointing to the degree of social ineptitude in many juvenile stalkers. That threats were common in this study and physical assaults occurred in a third of cases, clearly demonstrates that stalking by juveniles cannot merely be dismissed as harmless or otherwise innocuous behaviour.

While stalking is damaging to victims, the consequences of engaging in stalking can also be ruinous for young perpetrators, who may be liable to criminal prosecution under stalking legislation and related laws. Despite this, no systematic, empirical studies of juvenile stalking have been published. Given the potential seriousness of this behaviour, it is important to characterise the nature of stalking in juveniles, to ascertain what motivates this behaviour and to examine whether common legal interventions for managing stalking in adults are effective in young offenders. Identifying factors that motivate stalking in juveniles is especially salient as this will allow opportunities for early intervention to potentially avert the progression to other forms of offending, or the development of entrenched patterns of adult interpersonal violence.

Aims and Rationale of the Current Study

In Victoria, cases of stalking involving a juvenile perpetrator are managed by the Children's Court, usually via applications for intervention orders (IO). While stalking is a criminal offence in Victoria (Crimes Act, 1958), in only a handful of cases are primary criminal charges of stalking pursued in the Children's Court. This reflects the policy in Australia to avoid bringing juveniles into the adult criminal justice system whenever possible. Instead, the majority of stalking cases are managed in the civil jurisdiction via IO applications. In stalking cases, IOs are recommended by police and court staff to victims as a first-line approach to managing the unwanted behaviour as the Victorian anti-stalking law requires proof that the perpetrators' unwanted behaviour is *intentional*. The breach of an IO therefore provides, in theory, the basis for establishing intent for potential future criminal prosecutions. An IO is a court order designed to protect a person (the applicant) by restricting the unwanted behaviour of another person (the defendant). Defendants may be prohibited from any number of activities, including approaching or contacting the person, or threatening and assaulting the person. Intervention orders are typically utilised in cases of assault, property damage, harassment and stalking.

Reviewing court records for IO applications against juvenile defendants in the Children's Court therefore provides an avenue to examine the nature of stalking by children and adolescents. Using archival data of applications for an IO in the Melbourne Children's Court, the aims of this study were:

1. to examine the nature of juvenile stalking, including the characteristics of juvenile perpetrators and their victims, and whether the motivations for stalking observed in adults operate among juveniles;
2. to examine factors that differentiate whether IO applications are granted against juvenile defendants (including the presence of associated threats or physical violence and the nature of the prior relationship between victim and perpetrator);
3. to evaluate the effectiveness of IOs in reducing stalking recidivism among juveniles.

PROCEDURE

The sample was obtained by an archival search of the court records of consecutive applications for an IO against a juvenile aged 18 years or less in the Melbourne Children's Court in the Australian state of Victoria between January 1, 2004 and November 30, 2006. A person can apply to the Children's Court for an IO against a family member (which falls under the "Family Violence" section of the Victorian Crimes Act, 1987) or, if allegations of stalking are being made, against any person (which is brought under the "Victims of Stalking" section of the Crimes Act, 1958). An application for an IO may be made in the Children's Court when either party (eg. the family member/victim of stalking, or the defendant) is a child or young person. An adult may also make an application on behalf of a minor and police officers can make applications on behalf of adults, usually in emergency situations, or in cases where the victim is reluctant to initiate the process. Cases which involved an adult accused of family violence or stalking against a child were not included in this study.

Data from the court documents was systematically recorded onto data extraction forms by a Research Assistant (RA) who was a clinical psychologist with doctoral qualifications. The court documents in all cases contained the gender and date of birth (DOB) of the defendant, as well as a victim statement indicating their own demographic characteristics (gender, DOB) and the grounds and context for seeking the IO, which in most instances provided information regarding the nature of the prior relationship with the defendant, the methods and duration of the unwanted behaviours and the motivations or precipitants that gave rise to the behaviour. Witness statements and police reports could also be included and where available, provided additional sources of information. In cases where the defendant had been referred by the Magistrate for psychological or psychiatric assessment at the co-located Children's Court Clinic, data regarding mental health status was also available.

The RA was trained in the coding of study variables, including the characteristics of the victim and perpetrator, the methods of stalking, the motivation for the perpetrator's behaviour, information regarding the application itself (eg. whether it was filed by the victim or another person acting on their behalf, and under which legislation the application was filed); whether the order was granted, and if yes, whether it was subsequently breached. Where there were multiple applications against the same defendant, these were entered as a single case, with past applications recorded as a separate variable. Inter-coder reliability ratings between the first author (RP) and the RA were calculated during the piloting of the data extraction form using a random selection of 50 files for the following key variables: stalking motivation (coded as rejection; intimacy seeking/infatuation; bullying; retaliation/resentment; sexually predatory; other; unknown); prior relationship between victim and stalker (coded as ex-intimate partner; estranged friend; school peer; casual acquaintance; neighbour; stranger; other); total number of stalking methods (range 0-13); duration of stalking behaviours (calculated according to the approximate total number of days); and the presence of mental illness and/or substance use in the perpetrator (yes/no). The inter-coder reliability scores ranged between 0.96-0.75, being highest for the prior

While hard copies of IO applications lodged at the Melbourne Children's Court are stored on-site, information regarding charges of breaching an IO are stored on electronic recording systems at the court where the breach was processed. Therefore data regarding breaches of IOs were collected separately. A file containing the full name, DOB and file number for each case in which an IO application was granted in the Melbourne Children's Court was assembled. Both the name and DOB of the defendant were necessary as the spelling of the defendant's name may have been inaccurate in cases where the information was provided by the applicant. A Melbourne Children's Court staff member accessed the Victorian Courts' electronic recording systems to link the data sources. The matching of the datasets was performed in April 2007. Information regarding the date and nature of the breach were unable to be provided (eg. whether a threat or assault accompanied the breach), however the legal consequences of the breach were recorded.

Once retrieved, the breach data was then entered into the data extraction forms. When the data form for each case was verified as complete, the detachable cover sheet recording the defendant's name, DOB and case file number was detached and destroyed, ensuring no personal details could be identified.

Ethics Approval

The study was conducted with the approval of the Human Ethics Committee at Monash University and the Victorian Government's Department of Justice.

Definitions

Initial analysis indicated that the majority of IO applications were lodged under the Family Violence provision of the Crimes Act (58%), with 42% under the Victim of Stalking provision. Examination of the data indicated however that most applicants who were an ex-intimate partner of the juvenile defendant were typically filed as an 'aggrieved family member' under the Family Violence provision (83%), rather than as a stalking victim. Defining an ex-intimate partner as a family member may have relevance in adult courts, where the ex-intimate may be a former spouse or de-facto of the defendant, however this is harder to justify in a juvenile context where few (if any) protagonists are married or cohabitating. Therefore for the purposes of this study, irrespective of the provision under which the application was lodged, a *family violence* case was categorised as an application in which the applicant and defendant were related (e.g. parent, sibling, grandparent, cousin). A *stalking* case was categorised as an application in which a non-related person reported being subjected to multiple unwanted intrusive behaviours for a period of two weeks or more. While definitions of stalking also usually require that the unwanted contact produce fear in the victim, this criterion was not used in this study as IO applications do not systematically enquire about fear, nor is fear a requirement of the Victorian anti-stalking law (Crimes (Stalking) Act, 1958).

Furthermore, for the purposes of this study, a distinction was drawn between bullying and bullying involving stalking behaviours, on the basis of where the behaviours occurred. Stalking essentially involves forcing oneself on the attentions of another in a context where you have no legitimate right to be (Mullen et al, 2008). Approaches, notes, spoken provocations and even following which occurred entirely within the premises of a school or public institution which both victim and defendant were legitimately attending were classified here as bullying but not stalking. When such behaviours extended beyond the school or shared institution into the victim's domestic and social life in the wider community, this was classified as stalking.

Data Analysis

Data were entered into a statistical software package (SPSS, Version 15). Discrete variables were analysed using chi-square and continuous variables were compared between groups using independent t-tests or analysis of variance. In those instances where the assumptions for parametric statistics were violated, non-parametric tests were employed. To best predict variables associated with the successful granting of an IO application, binary logistic regression was used. In order to minimise Type I error associated with multiple comparisons, the error rate required to demonstrate significance was set at 0.01.

RESULTS

Intervention Order Applications

Between January 1 2004 and November 30 2006, a total of 1951 applications for intervention orders were processed in the Melbourne Children's Court (2004=651; 2005=641; 2006=659). Of these, 928 applications involved a juvenile defendant aged 18 years or less (2004=307; 2005=302; 2006=319). After removal of simultaneous applications against the same defendant (n=22), the total number of discrete cases was 906. Of these 906, 33.1% (299) met the study criteria for stalking and 48.3% (n=438) for family violence. The remaining cases involved isolated instances of threats and/or assault between non-related parties (15.2%; 138) and 31 cases (3.4%) of bullying that occurred only within the school setting.

While the purpose of this study was to examine cases of juvenile stalking via analysis of IO applications, given the unexpected frequency of family violence cases identified, these applications were also considered in the analysis. The stalking and family violence cases were compared on shared key variables (including the characteristics of the perpetrators, the rates of threats and assault, and the granting of IO applications). The cases involving isolated threats and assaults, and bullying were not analysed.

Juvenile Stalking Cases

Defendant Characteristics

Of the 299 cases that met the study criteria for juvenile stalking, the majority of defendants were male (64%;191), although a significant minority were female (36%;108). The mean age of this group was 15.4 years (SD=1.8; range: 9-18 years). Where their educational or employment status was able to be established from the court records (45%;134), the majority were attending secondary school (79%;106) with 8% (11) attending primary school. In 41 cases, the court records indicated that a previous IO application had been sought against the defendant.

As information regarding the defendant's characteristics was available in many instances only via the victim's or witnesses' statement, rates of substance use and mental illness could only be established where this information was mentioned spontaneously. Substance use was reported in 21 cases, usually involving alcohol or cannabis. Eight defendants were reported to have a diagnosed mental illness, namely psychosis (3, including one case involving erotomanic delusions), mood disorder (2), personality disorder (2) and adjustment disorder (1). Possible mental disorder, intellectually disability and autism spectrum disorders, however were suggested by the case notes in a substantial minority. Despite this, only one case was referred to the co-located Children's Court Clinic for evaluation.

Victim Characteristics

The majority of victims were female (69%;206) and the mean age was 18.8 years (SD=11.3, range: 5-77). Available data from the court records (62%;187) indicated that the majority

were attending secondary school (71%;133) or primary school (12%;23), with 11% (20) in paid employment. In 44% (132) the primary victim applied for the IO, while in the remaining cases (167) an adult bought the application on the victim’s behalf. This was more common when the victim was a child (97%) or adolescent (61%), rather than another adult (15%; $\chi^2=66.2, df=2, p<.001$).

Nature of the Prior Relationship between Victim and Defendant

The overwhelming majority of victims knew the defendant (98%;293), with only 2% (6) stalked by a stranger. The prior relationship involved a current or ex-school peer in 24% (73), a family or peer acquaintance in 23% (70), an ex-intimate partner in 21% (62), an estranged friend in 15% (45) and a neighbour in 14% (43). In 57% (170) of cases overall, the victim and defendant were the same gender, however analysis indicated that female defendants were significantly more likely than their male counterparts to engage in same gender stalking (86% vs 40%; $\chi^2=58.9, df=1, p<.001$).

Methods and Duration of Stalking Behaviours

Juvenile defendants typically subjected their victims to unwanted approaches, phone calls, text messaging and following (see Table 1). The mean number of stalking methods was 2.1 (SD=0.96; range 1-5). The duration of the unwanted conduct ranged from 16 days to 6 years, with a median of 120 days.

Table 1 Frequency of Stalking Behaviours

	% (n)
Unwanted approaches	76 (227)
Unwanted telephone calls	42 (127)
Unwanted text messaging	15 (47)
Following	16 (48)
Cyberstalking*	11 (34)
Loitering	10 (29)
Spreading malicious gossip	7 (22)
Maintaining surveillance	2 (7)
Unwanted letters	2 (5)
Unwanted gifts/material	1 (3)
Ordering or cancelling goods	1 (3)

* Cyberstalking included online harassment via instant messaging, email harassment and posting malicious content about the victim on websites

The term “stalking by proxy” has been coined to describe stalking activities that are perpetrated by others on the stalker’s behalf, either knowingly or unwittingly (Mullen et al, 2008). In 30% (77) of cases overall, a friend or associate of the defendant was recruited to

assist in the stalking of the victim. This tactic was utilized significantly more frequently by female defendants compared to males (42% vs 23% $\chi^2=10.9$, $df=1$, $p=.001$).

Threats and Assaults

Overall, 75% (239) of victims reported being threatened by the defendant and 15% (46) reported threats against a secondary target, usually a relative or friend. Threats ranged from the veiled (e.g. “watch your back”, “you’re going to get it”) to explicit threats to harm, rape or kill. Physical assaults by the defendant were reported by 54% (161) of victims. Cuts and bruises were common injuries from being punched, kicked and slapped by the defendant, although several victims lost consciousness after being strangled or suffering head injuries (in one case, the defendant smashed the victim’s head into the footpath). Serious sexual assaults were disclosed by five victims, including a 14 year old girl who was raped by her 15 year old ex-boyfriend on school premises.

Context and Motivations for the Defendants’ Behaviour

The motivation for the defendant’s behaviour and the context in which the stalking emerged were used to construct categories of stalking. All but six cases contained sufficient information to be categorized. The motivational categories significantly differentiated both aspects of the defendants’ characteristics and their methods of stalking (see Table 2). Six broad types of stalking were identified:-

(a) Stalking as an extension of bullying

This was the most common form of stalking (28%; $n=84$), which usually commenced in the school setting, but in all cases, extended beyond the school boundaries. No clear precipitant for the behaviour could be discerned other than the defendant’s apparent desire to persecute and torment the victim. The defendants commonly resorted to unwanted approaches, threats and assault. There was a single victim, usually a school peer (56%) or an estranged friend (21%). Males and females were equally represented as defendants and victims. Same gender stalking was most likely to occur in this context and it was relatively common for the defendant to engage others in stalking by proxy (see Table 2). In the most extreme example, a group of 40 school peers descended on the victim’s home and screamed abuse, before destroying the terrified family’s garden. It was common in this stalking context for a concerned parent to file the IO application on their child’s behalf (68%).

(b) Retaliating Stalkers

Retaliation for a perceived injury or slight motivated the stalking in 22% (65). Retaliatory cases were distinguished from bullying in that a precipitating incident or grievance could be identified in each instance. Males and females were equally represented among the defendants, who fixated their animus toward acquaintances (48%) and estranged friends (29%) and to a lesser extent school peers (17%). The stalking consisted mainly of unwanted approaches (82%) and telephone calls (55%). Threats were common, though comparatively few assaults were committed (see Table 2).

(c) Rejected Stalkers

Stalking following the termination of an intimate or dating relationship occurred in 22% (64). This usually, but not exclusively, involved a male defendant harassing and intruding upon a female, peer-aged victim (86% of cases). The victim and defendant had frequently attended the same school. Rejected defendants subjected the victim to unwanted approaches at multiple venues (73%), inundated them with phone calls (66%) and made threats. Interestingly, the median duration of stalking (2 months) was shortest among the rejected group (see Table 2). Third parties were often targeted by rejected

stalkers, typically the victim's parent(s) or new romantic interest. Threats were common and physical assaults occurred in 44% of cases (see Table 2).

(d) *Disorganized and Disturbed Stalkers*

In 20% (58) the defendant harassed a number of people at the same time, often with few, if any, obvious links between them. No clear precipitant for the behaviour could be discerned, other than defendant's frequently noted "longstanding" conduct problems. This group constituted a mixed bag of unhappy, angry and delinquent young people who appeared at war with their environment. They targeted multiple victims and in contrast to bullying, the stalking emerged outside the school context, usually involving prolonged harassment of neighbours (47%) and acquaintances (22%). The behaviour was largely confined to unwanted approaches (76%), threats and property damage, though assaults also occurred (Table 2). These defendants were the most likely to target adult victims (50%) and a number had previously come to the attention of the Children's Courts for unrelated offences.

(e) *Predatory Stalkers*

In 5% (16) of cases the defendant's behaviour was predatory, being aimed at imposing unwanted sexual contact on the victim. Most of these defendants were male, although one female exhibited this behaviour. The target was usually a younger child (31%) or an age-peer (62%). This group limited their behaviours to directly approaching the victim (56%) and making threats, usually to comply with their sexual demands. The rate of assault, often sexual, was higher in this group than any other category (13;81%; Table 2).

(f) *Intimacy Seeking Stalkers*

Few juveniles in this series were motivated by infatuation, or the desire to establish intimacy with the victim (6;2%). All but one of the defendants was a male pursuing a female, usually an acquaintance or school peer. While small in number, this group was notable for a longer duration of pursuit than all other groups and a greater number of harassment methods, being one of the few to maintain surveillance (50%) and loiter (33%). Threats and assault were comparatively rare (Table 2).

Table 2 Defendant and Victim Characteristics and Stalking Behaviour according to Motive

<i>Variable</i>	<i>Organised Bullying (n=82)</i>	<i>Retaliation (n=65)</i>	<i>Rejection (n=64)</i>	<i>Disorganised Harassment (n=58)</i>	<i>Predatory (n=16)</i>	<i>Infatuated (n=6)</i>	<i>Significance Test</i>
Gender (% Male)	51%	49%	86%	67%	94%	83%	$\chi^2=32.9, p<.001$
Perpetrator Mean Age (SD)	14.7 (2.0)	15.6 (1.5)	16.5 (1.2)	15.0 (1.5)	15.7 (1.9)	16.0 (1.9)	F=10.5, p<.001
Victim Mean Age (SD)	14.8 (3.9)	19.6 (11.1)	16.2 (1.8)	28.6 (18.6)	12.5 (1.9)	16.2 (1.8)	F=15.7, p<.001
Same Gender Stalking	84%	77%	3%	69%	19%	0	$\chi^2=131.3, p<.001$
Stalking by Proxy	42%	24%	27%	26%	20%	0	$\chi^2=9.5, p=.09$
Mean (SD) Stalking Methods	1.9 (0.8)	2.3 (1.6)	2.3 (1.1)	1.9 (0.7)	2.0 (0.8)	3.1 (1.1)	F=4.7, p<.001
Median (Range) Duration of Stalking (Months)*	6 (1-73)	5 (1-219)	2 (1-60)	6 (0.5-60)	6 (0.5-24)	12 (2-12)	$\chi^2=16.6, p=.005$
Damaged Property	22%	25%	28%	52%	6%	0	$\chi^2=23.8, p<.001$
Threatened Victim	77%	83%	70%	79%	87%	33%	$\chi^2=10.6, p=.06$
Assaulted Victim	66%	46%	44%	38%	81%	17%	$\chi^2=21.8, p<.001$

* non-parametric Kruskal Wallis

The Impacts of Juvenile Stalking on Victims

Victim statements provided an account of the impacts of the stalking, chief among them anxiety and pervasive fear that the defendant would “make good” on threats. Students subjected to stalking by peers and ex-partners attending the same school frequently indicated being unable to concentrate in class and fearing for their physical safety, both at school and in transit to and from school. Absenteeism and a decline in school performance were commonly reported. Severe depression or suicidal ideation was spontaneously reported in 32 cases, with one victim requiring hospitalization for severe depression and perilous weight loss. Similar levels of distress were reported by parents who filed applications on their child’s behalf, several indicating being so “sick with fear” for their child’s safety that they accompanied their children to and from school, often compromising their own job performance. In 14 cases, parents specifically indicated having removed their child from school or relocated home at considerable financial cost.

Outcomes of Intervention Order Applications in Juvenile Stalking Cases

In 48% (145) of cases, the IO application was granted, however a significant proportion were not (52%;154). Of those applications not granted, 46% (71) of victims discontinued the application prior to a formal court hearing, 23% (36) did not attend the hearing and in 31% (47) the case was struck out by the Magistrate (the reasons for striking out cases were not provided in the court records).

Binary logistic regression was used to examine whether hypothesised key variables predicted the granting of the IO applications. The following independent variables were entered step-wise in one block into the model: perpetrator gender, victim gender, stalking motive, the presence of threats and the presence of assault. The model failed to significantly predict the granting of the IO applications (omnibus $\chi^2=6.1$, $df=5$, $p=.29$).

Of the 145 applications granted, nine defendants (6%) were subsequently charged with breaching an IO in the Children’s Court. Four breaches involved rejected stalkers and two retaliatory perpetrators. The legal outcomes of the breaches involved a good behaviour bond in 2 cases, and probation in 2 cases, as well as a warrant to arrest, a fine and a youth supervision order. In the remaining 2 cases, the charges were dismissed by the Magistrate.

Family Violence Cases

Defendant Characteristics

The majority of family violence cases involved a male defendant (303;69%), with females accounting for 31% (135). The mean age was 15.6 years (SD=1.30, range 12-18 years). The educational status of the defendants was only able to be discerned from the court records in 24% of cases (n=107), however where this information was available, the majority were attending secondary school (57%;61), with 18 employed (17%) and 17 unemployed (16%). Three had been expelled from school and in one case the defendant was attending primary school. In 99 cases, a previous application for an IO had been sought against the defendant and in 13 cases, a history of prior criminal offending by the defendant was referred to in the court record, in most instances involving assault.

Like the juvenile stalking cases, information regarding the defendant’s rates of substance use and mental health problems could only be established where this information was spontaneously mentioned in the court records. In 70 cases, problematic substance use was

noted, most commonly involving alcohol (n=17) and cannabis (n=14), as well as chroming (4), amphetamines (1) and ecstasy use (1). Polysubstance use was reported in 17 cases, and in the remaining cases the nature of the substance use was not specified. Reference to the defendant experiencing a mental health problem occurred in 58 cases, most commonly involved attention deficit hyperactivity disorder (ADHD; n=17) and mood disorder (6). Conduct disorder (4), autism spectrum disorder (3) and adjustment disorder (3) was also noted, and in 17 cases, multiple conditions were reported. Two defendants were reported to have an intellectual disability. In total, 26 defendants (6%) were referred to the Children’s Court Clinic for psychiatric assessment.

As Table 3 demonstrates, the defendant’s living arrangements when the IO application was sought were able to be identified in 87% of cases (n=382), with most residing in a single parent home. While the data did not indicate which parent the defendant was living with in these cases, analysis indicated that the overwhelming majority of IO applicants were mothers (78%; 199) with only 11% (27) involving the father as an applicant. In contrast, when the defendant was residing with both parents, the mother was likely to be the applicant in 51% of cases (39) and the father in 29% (22).

Table 3 Living Arrangements of Defendants in Family Violence Cases

	% (n)
Living with One Parent	57.8 (253)
Living with Both Parents	17.4 (76)
Living with One Parent and their Partner	4.8 (21)
Living with Other Relative	4.1 (18)
Living in Residential Accommodation	2.5 (11)
Other	0.7 (3)
Unknown	12.8 (56)
Total	382

Victim Characteristics

The majority of victims were female (77%;338), with 23% (100) male. The mean age was 40.1 years (SD=12.1, range: 5-78). The victims of juvenile family violence were most likely to be the defendant’s parents (79%; 346, consisting of the mother in 279 cases and the father in 60 cases), or a sibling (11%;48). In 2 cases the victim was the defendant’s grandparent and in 7 instances a step-parent.

The Nature of Family Violence

Threats, assault and property damage were the most common forms of unwanted behaviour reported in the IO applications. Victims reported being threatened by the defendant in 53% of cases (231) and indicated threats against other family members in 10% (43). One 14 year old defendant threatened to kill his grandmother, who had intervened in a fight with his parents, if she called the police. The incident ended with the boy punching and kicking his grandmother. A minority of defendants threatened their victims with weapons, including knives, bottles or sporting equipment. Physical assaults against the victim occurred in 59% of cases (256) and against a third party in 12% (51). In one case a defendant broke his mother's nose, and a father was hospitalised after being assaulted by his 14 year old son following a (regular) argument over pocket money and homework. Property damage occurred in 62% of cases (268), consisting mainly of broken furniture, windows and possessions, and car vandalism. Few cases involved harassing behaviours, although 11% (47) of victims reported unwanted approaches by the defendant and 22 cases (5%) unwanted phone calls.

The modal duration of the unwanted behaviour was 1 day, although the maximum was reportedly 14 years (median=5 months).

Context of Family Violence IO Applications

In 94% of cases (n=410), the broad context in which the family violence occurred was able to be discerned from the court records. In the remaining 28 cases (6%) the context was unknown due to insufficient information. The latter cases either involved a one-off, and uncharacteristic, incident of property damage or assault by the defendant, or cases where a police officer applied for the IO on behalf of a reluctant victim (usually the defendant's parent) who refused to make a statement regarding the defendant's behaviour.

(i) Behavioural Problems

The majority of family violence applications involved a defendant with longstanding behavioural problems (49%;216). The majority of victims were a parent (85%), in three-quarters a mother, who reported being subjected to threatening and violent behaviour usually by a male offspring (69%). These defendants were reported to have been engaging in such conduct for months or even years prior to the IO application being sought. These cases were characterised by a defendant who failed to respect the victim's authority and attempts to limit or discipline behaviour, usually in relation to violent temper outbursts or general disobedience, as well as school refusal and substance abuse. One father had previously lodged two IO applications against his 14 year old son who repeatedly threatened to assault him and burn down the house if he didn't furnish him with money and alcohol. Property damage was common (67%), half the defendants threatened the victim and 62% committed an assault (one mother sustained serious facial injuries when her 16 year old daughter threw a lamp at her). Male and female defendants in this group did not differ according to the frequency with which they resorted to threats, assaults or property damage, and the duration of their unwanted behaviour was equivalent. It was not uncommon for the victims in this category to state that they were at their "wits end" or could no longer cope with managing the defendant's behaviour, and many indicated that they were fearful of living in the same house.

(ii) Intimidation

In 12% (53) of cases, the defendant's behaviours were designed to intimidate the victim, either with the apparent sole intention to create fear (usually in a sibling, who accounted for 17% of

victims), or to also achieve some end, such as obtaining money or alcohol, from a parent (who comprised 69% of victims). These defendants were male in 66%, and the victims predominantly female (85%). Defendants were frequently described as being 'menacing' and the behaviour had the desired effect of inducing a high degree of fear, with victims not uncommonly indicating in their statement that they "feared for their life" or that of their other children.

Other Contexts

In 8% of cases (34), the primary context involved *retaliation*. The majority of these defendants were male (75%) and the victims female (79%). In these cases, the precipitating event typically involved an argument or physical altercation between the defendant and the applicant, who was usually a parent (82%) or sibling (15%). In these cases, parents often acknowledged their own provocative behaviour in the situation, for example, 'man-handling' the defendant, or instructing the defendant to leave or move out of the home (one mother admitted to having slapped her teenage daughter across the face prior to the girl smashing several windows in the house with bricks). They nonetheless sought the assistance of the police or courts in response to the defendant's threats (44%), assault (62%) or property damage (61%). It was not uncommon in these cases for the police to apply for the IO on the behalf of a reluctant parent, given concerns for the victim's safety and welfare.

In 9.5% of cases (39), the defendant's unwanted behaviour occurred in the context of *family problems*, including shared custody arrangements between warring parents, recent upheaval due to parental separation or divorce, or blended families. In 6% (25), the defendant's violence occurred in the context of an established or an emerging *mental health problem*. In these cases, victims frequently reported concern regarding the defendant's worsening mental state, noting that violence usually 'erupted' when the defendant was subject to stress or affected by drugs and alcohol. In a further 8% (34) the defendant's violence was largely motivated by *drug-related issues*, with property damage the most frequent outcome of the defendant's attempts to steal the victim's money, jewellery or other possessions to fuel their addiction. It was not unusual in these three contexts for the victim to express regret in their application that an IO was necessary to manage the defendant's behaviour, but most reported feeling that they had 'no other option'.

Finally, 9 family violence cases (2%) involved allegations of *sexually predatory behaviour* by the defendant against another relative, including nieces, cousins, step-sisters, step-cousins and half-sisters. All but one case involved a male defendant and the victim was a female in 7 cases. Allegations of completed sexual assaults and molestation were present in 8 of the cases, and an attempted assault was reported in the other case. Most victims were younger than the defendant (including two 5-year old victims), with only one case targeting an older victim.

Outcomes of Intervention Order Applications in Family Violence Cases

Of the 438 family violence cases, 43% (189) resulted in the IO application being granted, although the majority were not (54%;238). Of the applications not granted, 52% (125) of victims discontinued the application prior to a formal court hearing, 18% (44) did not attend the hearing and in 28% (66) the case was struck out by the Magistrate (the reasons for striking out cases were not provided in the court records). In 3 cases the application was adjourned. Interestingly, analysis indicated that 'non-appearance' was significantly more likely to occur when the applicant was the primary victim (75%), as opposed to an(other) adult acting on their behalf (25%; $\chi^2=14.5$, $df=3$, $p=.002$).

Binary logistic regression was used to examine whether key variables predicted the granting of the IO applications. The following independent variables were entered step-wise in one block into the model: defendant gender, victim gender, the presence of threats and the presence of an assault. The model failed to significantly predict the granting of the IO applications (omnibus $\chi^2=8.9$, $df=4$, $p=.06$), although a trend level difference was observed. Post-hoc analysis indicated that only the defendant's gender significantly predicted whether the IO was granted ($p=0.005$), with orders more likely to be granted if the defendant was a male (49%) than a female (34%).

Of the 189 applications granted, 35 defendants (18.5%) were subsequently charged with breaching an IO. The legal outcomes of the breaches involved probation in 8 cases, a good behaviour bond (6), a fine (3), a youth supervision order (2) or youth attendance order (3), with 1 case ordered to detention in a youth training facility. In 9 cases, the charges were subsequently dismissed by the Magistrate and in 3 cases the outcome had not been finalised by the court.

Comparison between Stalking and Family Violence Cases

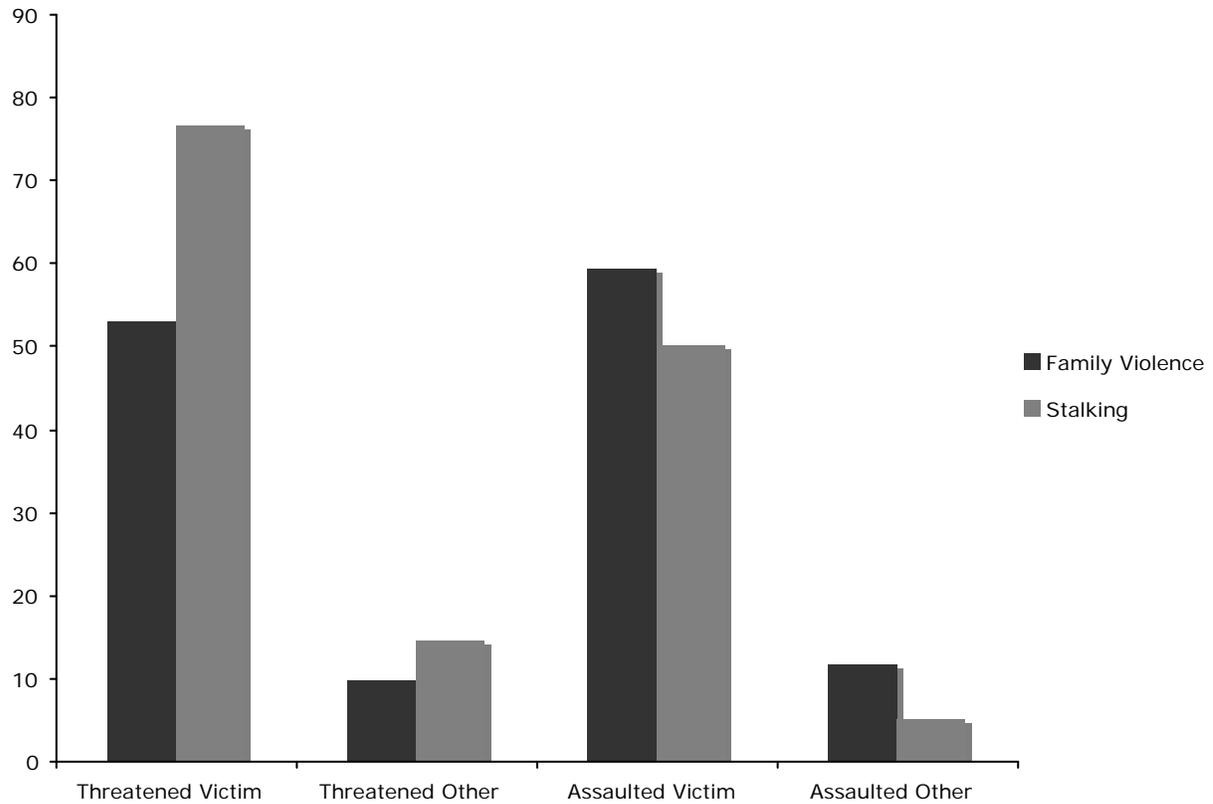
The gender of the defendants did not differ between the stalking and family violence cases, with an equivalent proportion of males in each group (64% vs. 69% respectively; $\chi^2=2.25$, $df=1$, $p=.13$), nor did the mean age of the defendants ($t(735)=1.4$, $p=.16$). In terms of the victims' characteristics, there was a trend for a higher proportion of female victims in the family violence group (77%) compared to the stalking group (69%; $\chi^2=5.8$, $df=1$, $p=.02$), and the mean age of the family violence victims was significantly older than the stalking group (40.1 years vs. 18.7 years; $t(734)=24.1$, $p<.001$).

As previously noted, the reporting of being in fear for one's safety as a result of the defendant's conduct is not a prerequisite for obtaining an IO (or for invoking anti-stalking legislation) in the State of Victoria. Nonetheless, the reported rates of fear were significantly higher in the stalking group (65%) compared to the family violence group (39%; $\chi^2=47.1$, $df=1$, $p<.001$). However there was a significantly greater frequency of 'out of hours' applications for an IO (suggestive of an emergency situation) in the family violence cases (29%) compared to the stalking cases (3%; $\chi^2=77.4$, $df=1$, $p<.001$).

Threats and Assaults

The frequency of making threats differed significantly between the groups, being higher in the stalking than family violence cases (76% vs. 53%; $\chi^2=42.2$, $df=1$, $p<.001$). Threats against third parties were also elevated in the stalking group (15%) compared to the family violence cases (10%), although this failed to reach statistical significance ($\chi^2=4.0$, $df=1$, $p=.04$). The rates of physical assault against the victim however was higher in the family violence cases (59% vs. 50%; $\chi^2=6.1$, $df=1$, $p=.01$), as were the rates of assault against others (12% vs. 5%; $\chi^2=9.5$, $df=1$, $p=.002$; see Figure 1). The rates of property damage were also significantly higher in the family violence group (62%) compared to the stalking cases (22%; $\chi^2=79.7$, $df=1$, $p<.001$).

Figure 1 Rates of Threats and Assault according to Stalking and Family Violence Cases



Outcomes of Intervention Order Applications

The proportion of IO applications granted did not differ according to group ($\chi^2=0.98$, $df=1$, $p=.32$), nor did the reasons for not granting the order ($\chi^2=2.6$, $df=1$, $p=.44$). However intervention orders were significantly more likely to be breached in family violence cases (18.5%) compared to the stalking category (6%; $\chi^2=10.4$, $df=1$, $p<.001$). Overall, charges of breaching an IO were associated with the nature of the prior relationship between the defendant and victim ($\chi^2=19.8$, $df=7$, $p<.01$), with breaches most frequently reported by parents (62%;30) and ex-intimate partners (12%;6) and rarely by acquaintances (2%;1). There were no significant associations between charges of breaching an IO and the defendant's gender, or the reporting of either threats or assaults.

DISCUSSION

Despite almost a decade and a half of research on stalking, this is the first empirical study to systematically examine this behaviour in young perpetrators. The study was designed to explore the nature of stalking among juvenile perpetrators, to identify contexts in which stalking emerges in this population and to assess the utility of intervention orders for managing this form of offending. While the results provide the first comprehensive account of the motivations for, and patterns of, stalking in juveniles, it also unexpectedly provides an insight into the nature

of family violence involving young perpetrators. These two forms of juvenile violence will be discussed, along with the practical and clinical implications of this research. The report concludes with recommendations and proposals for future research.

Juvenile Stalkers

Stalking by children and adolescents has been labelled 'relatively rare' or 'uncommon' (Scott et al, 2007), despite there being no prevalence studies of stalking in this age group. Even when stalking behaviours are recognised in young perpetrators, they are all too commonly trivialised as harmless or inoffensive. Patterns of rejected stalking in this age group are often framed as merely the 'throes of a broken heart', and infatuation commonly conceived as representing little more than a crush or 'puppy love' (see Brewster, 2003). There is no doubt that a continuum of behaviour exists here, from the valid but misguided attempts to rekindle a terminated relationship, and the inept efforts to establish a relationship, through to the damaging forms of protracted pursuit that clearly constitute stalking. The reluctance of many researchers and clinicians to acknowledge stalking behaviour in juveniles is arguably driven - not unreasonably - by a desire to avoid pathologising normal and commonplace behaviours in young people, such as the phenomena of the crush. Nonetheless, as the results of this study demonstrate, juveniles do engage in stalking, the consequences of which may be devastating to many young victims. There is no reason why the seriousness that is afforded to adult forms of stalking should not equally apply to juveniles.

In this study, 33% of all applications for an intervention order against a juvenile perpetrator met the study criteria for stalking, the behaviour involving multiple intrusions against a non-relative which persisted for two weeks or more. It is not immediately apparent to whom this population of juvenile stalkers should be compared. Had most of the subjects been adults they would, on the basis of their behaviour, most likely have been charged with criminal offences, rather than be left to the civil jurisdiction. This is appropriate given the policy in Australia to avoid bringing juveniles into the adult criminal justice system whenever possible. It suggests however that the proper comparisons are to forensic rather than community samples of adult stalkers.

The picture of juvenile stalking that emerges in this study differs to that observed in adults. In contrast to adult stalkers, who typically utilise a broad repertoire of intrusive behaviour, including relatively covert forms of harassment such as loitering nearby and maintaining surveillance (e.g. Harmon et al, 1998; Mullen et al, 1999), juvenile stalkers in this sample favoured *immediate and direct* means of contact, mostly via unwanted approaches and phone calls or text messaging. Interestingly the rates of threats (72%) and assault (51%) in these juvenile stalkers is notably higher than those reported in adult samples, where the overall frequency of threats range between 30-60% and assaults between 25-35% (see McEwan et al, 2007). The extent to which this reflects an age-crime curve, or other stalking-specific influences warrants further attention. For example, in adult forensic samples, the lowest rate of violence is found among those who pursue strangers (McEwan et al, 2007). That there were only six perpetrators in this study who pursued strangers may explain part of the relative increase in the rates of violence. Poor impulse control is also probably a greater factor together with generally higher rates of interpersonal aggression in this age group.

Also notable in this sample was a greater involvement of female perpetrators. Females were mainly encountered in the contexts of bullying and retaliation, and typically focused their harassment on a victim of the same gender. Like their adult counterparts, juvenile female stalkers did not differ from males in the persistence or intrusiveness of their unwanted conduct

(Purcell, Pathé & Mullen, 2001; Meloy & Boyd, 2003). They did, however, more frequently recruit others to their efforts to harass the victim. For example, one 14 year old female commenced a campaign of harassment against an estranged friend and schoolmate whom she accused of “ruining” her birthday party (on the basis that the victim’s outfit upstaged her own). The defendant used text messages to spread false and malicious rumours about the victim’s sexual history and recruited friends to harass the victim, and her family, in shopping centres and other public venues. The volume of nuisance and hang-up calls made to the victim’s home by this group was sufficient for the family to change their telephone number. When the defendant self-inflicted wounds and made false claims of assault against the applicant, the family finally sought, and obtained, an intervention order. Interestingly, McCann (2001) argued that the involvement of a group disqualifies the behaviour as stalking, as, in his opinion, only individuals stalk. In his view, group harassment can only be construed as bullying. This ignores the tactic of stalking by proxy (Mullen et al, 2008), which at this early stage of enquiry appears to be a more common feature of juvenile than adult stalking and perhaps reflects (female) adolescents’ propensity to offend within the context of a peer group rather than as isolated individuals.

When it comes to the impact of the behaviour on victims, however, the parallels with adult victims are clear.

The impacts of the stalking in this sample closely resembles that reported by adult victims (Pathé & Mullen, 1997; Kamphuis & Emmelkamp, 2001; Purcell et al, 2005), with anxiety and pronounced fear prominent. Given that most victims were themselves juveniles at a critical phase in their psychosocial development, the long term effects may well be even more serious than in most adult victims. This data argues not just for recognizing the seriousness of juvenile stalking, but for establishing appropriate support and treatment services for these young and often vulnerable victims.

The Motivations for Juvenile Stalking

The motivations that gave rise to the stalking in this juvenile sample differed somewhat from those seen in adults. Stalking by ex-partners was less frequent than in adult cohorts (Meloy & Gothard, 1995; Harmon et al, 1998; Mullen et al, 1999; Palarea et al, 1999), though still made a substantial contribution. Stalking as an extension of bullying was the most common form, which is not surprising. What was unexpected was the frequency of stalking related to retaliation and a non-specific pattern of disorganized harassment usually directed at multiple targets, the latter form being rarely encountered among adults. There was an almost total absence of stalking related to infatuation or attempts to impose an unwanted relationship by repeated advances, except in the context of sexual predation.

In the only other case study of juvenile stalkers (McCann, 2000) the primary motivation for pursuing the victim was the desire to establish intimacy. However only 3% of cases in the current study were motivated by infatuation. This difference is likely related to sampling issues. For example, McCann (2000) drew several of his cases from mental health evaluations, some of whom displayed erotomania. In contrast, the data in this study pertains to individuals who were sufficiently persistent and disturbing to bring their victims, or a parent, to take civil action. It is probable that relationship intrusions even in their more extreme manifestations are regarded by their targets as within the range of normal, if unpleasant, experiences of adolescence. Even though such relationship intrusions involve stalking-like behaviours, because they tend to be normalized they are likely to evoke irritation rather than fear (Sinclair & Frieze, 2000; 2005; Spitzberg & Cupach, 2003) and hence not precipitate legal intervention.

Contrary to McCann's case series (2000), where only one juvenile stalker pursued an ex-intimate partner, rejected stalking following a relationship breakdown was more common in this sample. Consistent with patterns of rejected stalking in adults (Mullen et al, 1999), this behaviour was usually perpetrated by a young male against a female ex-intimate. The victims frequently alluded in their IO applications to strong themes of possessiveness, entitlement and intense jealousy among these defendants, who were unwilling to accept their partner's decision to terminate the relationship. It was not possible to establish from the file review how many of these relationships were sexually intimate, although by juvenile standards a significant proportion were long-term (e.g. 12 months or more).

Like their adult counterparts, rejected juveniles drew on a greater repertoire of stalking behaviours, including intrusive approaches and phone calls, spreading malicious rumours, property damage, threats and violence (see Mullen et al, 1999; Harmon et al, 1998; Palarea et al, 1999). One 14 year old girl who ended a relationship with her 15 year old boyfriend on the basis of her unwillingness to acquiesce to his demands for sex, was stalked and raped by the defendant, subsequently requiring a pregnancy termination. Rejected juveniles not only focussed their violent intentions towards their ex-partner, but were the most likely group to target secondary victims, usually the victim's parents or friends. The school environment was the most common backdrop for rejected juvenile stalking – if not the venue where the defendant and victim met, then one of the forums where the offending occurred. It is the combination of the high degree of threatening behaviour and the physical setting of the stalking that increases the risk to the victim of the rejected juvenile. Young victims frequently reported feeling vulnerable to ongoing intrusions and assaults at school, as well as in transit to and from school. School absenteeism and a decline in academic performance in this context was frequently reported in the victim's IO applications.

Such rejected patterns of stalking in juveniles should not be unexpected. Dating violence is one of the most common forms of violence reported by young people (Carolyn Olson, Rickert & Davidson, 2004; Howard, Qiu & Boekeloo, 2003; Kreiter et al, 1999). In Australia, the median age of first vaginal intercourse for both males and females is 16 years (Rissel et al, 2003). Juveniles may be *physically* capable of sexual intimacy, however developmental variations in emotional and cognitive maturity likely contribute to problems managing experiences such as rejection.

Not surprisingly, stalking as an extension of bullying was the most common context in which stalking arose in this sample. What was unexpected was the school's response to this in a number of cases. While IO applications were no more likely to be granted in the bullying context compared to the other motivational categories, the file review revealed that in several cases involving extreme bullying by a school peer, the application was not granted following correspondence to the Magistrate by school authorities that enforcement of the IO would be "untenable". As intervention orders commonly prohibit the defendant from harassing, threatening or assaulting the applicant (as opposed to maintaining a specified physical distance from the victim), it is unclear why enforcing such behaviour would be considered "untenable" in a school (it being safe to assume that protecting students from such violence is exactly the responsibility of educators). Schools undoubtedly face dilemmas responding to, and resolving cases of stalking which involve students. The cases in this study certainly attest that schools encounter a range of problematic behaviours involving students, some of which are frivolous or outright vexatious claims of victimisation, and some which would meet the criteria for criminal behaviour (e.g. stalking, assault or threats to kill). Given the frequency of this form of stalking in

juveniles schools must develop, articulate and implement policies for effectively managing stalking behaviour by students, with a concomitant emphasis on protecting vulnerable victims.

Finally, the presence of a subgroup of 16 predatory stalkers in this sample was concerning. Most of these subjects would on the basis of the complaints have been charged in an adult court with serious sexual offences. These were not over-eager or insensitive approaches, but persistent patterns of following culminating in sexual assaults or intimidation aimed at obtaining sexual contract. How appropriate a civil order is in such cases must be questioned.

Family Violence

An unanticipated aspect of this study was the frequency with which intervention orders were sought against juveniles by their relatives, predominantly parents. Family violence applications accounted for almost half of all IO applications in the Melbourne Children's Court during the study period.

The majority of these cases emerged in the context of an adolescent offspring with reportedly long-standing behavioural problems subjecting his or her parents, and to a lesser extent siblings, to abuse and intimidation via property damage, threats and physical assaults. The majority of these defendants were male, although almost a third were female. Most applicants were females, usually the defendant's mother. Perhaps the most striking observation in these applications was the frequency with which this behaviour emerged in a single parent household (58%). Indeed, only 17% of defendants in this group resided with both parents. The overall impression from the file review was of parents struggling with a lack of authority and/or skills to adequately discipline and communicate with an angry or volatile child. In many cases, police assistance was reluctantly sought as a 'last resort' after an particularly dramatic incident of property damage or assault, and often motivated by the desire to protect younger children from witnessing further violence. However in a minority of cases the parent's intention was clear. They were seeking the order to prohibit their child from approaching them, and as a consequence, residing any longer in the family home.

The temptation to label much of the behaviour in the family violence applications as 'family dysfunction' is unjustified as it fails to reflect the severity, and in some cases brutality, of the defendants' conduct. Over 60% of juvenile defendants assaulted the victim, and while most cases resulted in only minor injuries, several parents and siblings were hospitalized for broken limbs or loss of consciousness. Eight victims however, reported being subjected to sexual assaults or molestation by a sexually predatory juvenile relative (and a further case involved attempted sexual assault). Several dozen parents indicated in their applications "living in fear" of the defendant, if not for their own sake, then the safety and wellbeing of their other children. In this context, the decision to obtain an intervention order against their child prohibiting further violence is not unreasonable. It is the significant challenges of *enforcing* such an order when the defendant and applicant continue to cohabit that make this remedy more questionable.

The results demonstrated that 39% of family violence applications were discontinued by the victim prior to the court hearing, and a further 14% were struck out by the Magistrate. The study was unable to determine *why* these cases were abandoned, although it is optimistic given the reported longevity of the defendant's behaviour to assume that the process of applying for an IO had the desired effect of stemming the unwanted conduct. Almost one out of five intervention orders granted in the family violence context were reported as having been breached by the defendant. It is unknown how many orders were breached but not reported

due to a parent's reluctance to potentially expose their (however aggressive or violent) child to criminal prosecution.

The Utility of Intervention Orders for Managing Juvenile Stalking and Family Violence

As previously noted, intervention orders are commonly recommended as a first line response to managing stalking, since anti-stalking legislation in many jurisdictions requires proof that the perpetrator's behaviour is intentional (Purcell et al, 2004a). In the cases of family violence, such orders offer a potential remedy to the behaviour, without having to resort to pressing criminal charges of assault, threats or property damage against a child or sibling.

While IOs are commonly utilised to curtail stalking and family violence, their effectiveness is yet to be established. Clinical evidence suggests that IOs are unlikely to be effective against two classes of stalker in particular: (1) ex-intimate partners, many of whom have invested too much emotionally in the relationship that they all too often become humiliated and enraged if the victim attempts to legally prohibit further contact, and (2) mentally ill (particularly delusional) stalkers, whose attachment to the victim is based on a fantasised and idealised relationship, such that legal orders are entirely irrelevant (Orion, 1997; Mullen et al, 2000). De Becker (1997) also queried the effectiveness of IOs against certain categories of stalkers, arguing that they are most likely to be effective against a reasonable person who has limited emotional investment in his or her relationship with the victim, and no history of violence.

To date, only two studies have examined the effectiveness of IOs in adult stalkers. In a small Finnish sample, Hakkanen and colleagues (2003) reported that 35% of stalkers were reported for breaching their order, which is considerably lower than the 80% in a large Australian forensic sample of stalkers (McKenzie, unpublished thesis). The current results indicated that, overall, charges of breaching an IO occurred in 19% of cases during the study period. Breaches were significantly more likely to be reported however in cases of family violence than stalking. The rate of breaches within the family violence context is arguably likely to be an underestimate, given the dilemma parents face in reporting their child for a breach. Nonetheless, on the basis of these preliminary figures, intervention orders may be effective in managing cases of juvenile stalking, with the exception of ex-intimate partners.

The optimism of a 19% breach rate overall should be tempered however by the finding that the majority of IO applications were not granted, predominantly due to the applicant failing to proceed with their case. As previously indicated, this research was unable to determine why applicants discontinued or failed to appear at the court hearing, an issue that warrants further investigation (e.g. whether the applicant was fearful of proceeding, or whether the interim order was perceived as futile or effective by the time of the Court hearing). The frequency with which IO applications against a juvenile were discontinued likely represents a costly exercise for the courts. The only variable that *increased* the likelihood that applications would proceed to hearing was whether another adult sought the order on the victim's behalf (this was relevant only in the family violence cases). Encouraging applicants to access and utilise social support throughout the process of applying for an intervention order may be a salient influence in this regard.

Interestingly, the only factor that predicted whether an IO application was granted by the Magistrate was the defendant's gender in the family violence cases. Orders were significantly more likely to be granted against young males than females. This result is curious, since females, when they did engage in family violence, were as persistent, intrusive, threatening and assaultive as their male counterparts. Applications for intervention orders should ideally be

adjudicated on the severity and seriousness of each case, not the gender (and outdated role stereotypes) of the perpetrator.

Study Limitations

The study data was derived from a retrospective audit of consecutive applications for an IO against a juvenile, rather than a prospective study of juveniles charged with criminal stalking. In the absence of psychological assessments in most cases, there were gaps in the data relating to the perpetrators' characteristics, particularly their mental health and substance use. Further information regarding these variables at the time of the offending would have been desirable, as they have been shown to be important mediators of offending in other populations. Given the study time frame, the 'opportunity' for defendants to have contravened their intervention orders ranged from five to 39 months. A longer duration of follow-up would be advantageous to not only consider charges of breaching the IO, but other criminal charges, such as stalking, uttering threats or assault. Furthermore, while the results indicate the frequency of reported breaches of an intervention order, this study cannot definitively address whether or not IOs are *effective* in managing stalking and family violence, since not all victims report breaches to police, and not all reports of breaches result in formal charges. Despite these limitations, the large sample able to be assembled in this study affords a strong degree of confidence in the representativeness of the IO applications reviewed and therefore the generalisability of the findings.

Conclusions

The neglect of juvenile stalking is striking when one considers the crucial stage at which this behaviour occurs in both the victim's and perpetrator's social, emotional and vocational development. Qualitative data in this study indicates that being stalked during adolescence not only compromises the victim's emotional well-being, but in cases where the protagonists continue to interact at school, can significantly interfere with their educational functioning, the consequences of which may echo into future employment or higher education opportunities. The developing personality of the young victim may also be influenced by the experience of being stalked, such that prominent themes of fear and mistrust are incorporated, to the potential detriment of their social and interpersonal functioning.

While the potential impacts on the victim (and perpetrator) are cause enough for greater attention to juvenile stalking, it is the opportunity for prevention - or at least early intervention - with this group of offenders that makes the issue so especially relevant. Intervening at the first signs of stalking behaviours offers the best chance to reduce stalking recidivism in the perpetrator, and arguably to stem any progression to more entrenched or serious forms of interpersonal violence in later life, including domestic abuse or sexual assault. Regrettably, early intervention in juvenile justice and adolescent forensic mental health is sorely lacking, if not absent, in most countries. Reform is urgently needed to both promote the *functional* recovery of young offenders, and to move to a more preventative approach in the management of offenders and offending. Only the most obvious cases of psychiatric illness are referred for court mandated clinical assessment; in this sample, only one juvenile with obvious erotomaniac delusions. Given the lack of evidence for the effectiveness of primary crime prevention programs in young people (eg. Mytton et al, 2006), at this stage of research, identifying relevant risk factors for stalking among juveniles (eg. attitudinal or environmental experiences) and developmental trajectories of this behaviour will be valuable to informing prevention programs which target those at heightened risk for stalking.

Recommendations

In light of the findings from this study, a number of recommendations are offered.

Further research

7. Based on the qualitative reports of the impacts of juvenile stalking in this sample, systematic research into the mental health, social and vocational impacts of stalking in juvenile victims is required.
8. Given the rates of applicant withdrawal of IO applications and non-appearance, research into the reasons for applicant discontinuation is warranted, along with examination of how these factors can be addressed (e.g. the provision of court support for IO applicants in the Children's' Court).
9. Longitudinal follow-up of samples of juvenile stalkers and family violence offenders in order to ascertain their rates of offending in adulthood
10. Additional research to compare (a) recidivism rates amongst defendants who receive a IO and those who do not and (b) investigation of the impact of legal consequences for breaching an IO (eg. probation or a good behaviour bond) on recidivism rates.

Policy Implications

11. Given the frequency with which juvenile stalking emerges or occurs within the school environment, there is a need for greater awareness in schools of the seriousness and potential impacts of this behaviour, and the development and implementation of policies for effectively managing this conduct.
12. Development of an early intervention paradigm in the clinical and judicial management of juvenile stalkers and family violence offenders

References

- Australian Bureau of Statistics. *Women's Safety, Australia, 1996*. Canberra: Commonwealth of Australia, 1996.
- Australian Bureau of Statistics. *Personal Safety Survey 2005*. Canberra, Commonwealth of Australia, 2005.
- Brewster M. Children and stalking. In M Brewster, ed. *Stalking: Psychology, Risk Factors, Intervention and Law*. New York: Civil Research Institute, 2003
- Budd T, Mattinson J. *The Extent and Nature of Stalking: Findings from the 1998 British Crime Survey*. London: Home Office Research, Development and Statistics Directorate, 2000
- Carolyn Olson E, Rickert VI, Davidson LL. Identifying and supporting young women experiencing dating violence: what health practitioners should be doing NOW. *J Pediatr Adolesc Gynecol* 2004; 17:131-6.
- Cupach WR, Spitzberg BH. Obsessive relational intrusion and stalking, in *The Dark Side of Close Relationships*. Edited by Spitzberg BH, Cupach WR. New Jersey, Lawrence Erlbaum Associates, 1998, pp 233-263
- De Becker, G. (1997) *The Gift of Fear: Survival Signals that Protect us from Violence*. London: Bloomsbury
- Emerson RM, Ferris KO, Gardner CB. On being stalked. *Social Problems* 1998; 45:289-314
- Farnham FR., James DV, Cantrell P. Association between violence, psychosis and the relationship to victim in stalkers. *Lancet* 2000; 355:199
- Hall DM. The victims of stalking. In: Meloy JR, ed. *The Psychology of Stalking: Clinical and Forensic Perspectives*. San Diego, CA: Academic Press, 1998:113-137.
- Hakkanen H, Hagelstam C, Santtila P. Stalking actions, prior offender-victim relationships and issuing of restraining orders in a Finnish sample of stalkers: *Legal and Criminological Psychology* 2003; 8:189-206
- Harmon RB, Rosner R, Owens H. Sex and violence in a forensic population of obsessional harassers. *Psychology, Public Policy, and Law* 1998; 4:236-249
- Haugaard JJ, Seri, LG. Stalking and other forms of intrusive contact after the dissolution of adolescent dating or romantic relationships. *Violence and Victims* 2003;18: 279-297
- Howard D, Qiu Y, & Boekeloo B. Personal and social contextual correlates of adolescent dating violence. *J Adolesc Health* 2003; 33(1), 9-17.
- Jason LA, Reichler A, Easton J, et al. Female harassment after ending a relationship: A preliminary study. *Alternative Lifestyles* 1984; 6:259-269
- Kamphuis JH, Emmelkamp PMG. Traumatic distress among support-seeking female victims of stalking. *Am J Psychiatry* 2001; 158:795-798
- Kreiter SR, Krowchuk DP, Woods CR, Sinal SH, Lawless MR, & DuRant RH. Gender differences in risk behaviors among adolescents who experience date fighting. *Pediatrics* 1999; 104(6), 1286-1292.

- Langhinrichsen-Rohling J, Palarea RE, Cohen J, Rohling ML. Breaking up is hard to do: Unwanted pursuit behaviours following dissolution of a romantic relationship. *Violence and Victims* 2000; 15:73-90
- McCann, JT. A descriptive study of child and adolescent obsessional followers. *J Forensic Sciences* 2000; 45:195-199
- McCann, JT. *Stalking in Children and Adolescents: The Primitive Bond*. Washington DC, American Psychological Association, 2001
- McEwan T, Mullen PE, Purcell R. Identifying risk factors in stalking: A review of current research. *International Journal of Law and Psychiatry* 2007, 30: 1-9
- Meloy JR., Gothard S. A demographic and clinical comparison of obsessional followers and offenders with mental disorders. *Am J Psychiatry* 1995; 152:258-263
- Meloy JR & Boyd C. Female stalkers and their victims. *Journal of the American Academy of Psychiatry and the Law* 2003; 31, 211-9.
- Mullen PE, Pathé M, Purcell R, Stuart GW. A study of stalkers. *Am J Psychiatry* 1999; 156: 1244-1249
- Mullen PE, Pathé M, Purcell R. *Stalkers and their Victims* (2nd Edition). Cambridge: Cambridge University Press 2008
- Mytton J, DiGuseppi C, Gough D, Taylor R, Logan S. School-based secondary prevention programmes for preventing violence. *Cochrane Database of Systematic Reviews* 2006, Issue 3. Art. No.: CD004606. DOI: 10.1002/14651858.CD004606.pub
- Orion D. *I Know You Really Love Me: A Psychiatrist's Journal of Erotomania, Stalking, and Obsessive Love*. New York: Macmillan 1997
- Palarea RE, Zona MA, Lane JC, Langhinrichsen-Rohling J. The dangerous nature of intimate relationship stalking: threats, violence, and associated risk factors. *Behavioral Sciences and the Law* 1999; 17:269-28
- Pathé M, Mullen PE. The impact of stalkers on their victims. *Brit J Psychiatry* 1997; 170:12-17
- Purcell R, Pathé M, Mullen PE. A study of women who stalk. *Am J Psychiatry* 2001; 158: 2056-2060
- Purcell R, Pathé M, Mullen PE. The prevalence and nature of stalking in the Australian community. *Aust NZ J Psychiatry* 2002; 36:114-120
- Purcell R, Pathé M, Mullen PE. Stalking: defining and prosecuting a new category of offending. *International J Law and Psychiatry* 2004a; 27: 157-169
- Purcell R, Pathé M, Mullen PE. Editorial: When do repeated intrusions become stalking? *Journal of Forensic Psychiatry and Psychology*, 2004b; 15 (4); 571-583
- Purcell R, Pathé M, Mullen PE. The association between stalking victimization and psychiatric morbidity in a random community sample, *British Journal of Psychiatry* 2005; 187: 416-420
- Rissel CE, Richters J, Grulich AE, de Visser RO, Smith AM. Sex in Australia: First experiences of vaginal intercourse and oral sex among a representative sample of adults. *Aust & NZ J Public Health* 2003; 27:131-137

- Saunders R. The legal perspective on stalking. In J.R. Meloy (Ed.) *The Psychology of Stalking: Clinical and Forensic Perspectives* (pp. 28-48). San Diego: Academic Press, 1998
- Schwartz-Watts D, Morgan DW. Violent versus non-violent stalkers. *J Am Acad Psychiatry and Law*, 1998; 26:241-245
- Scott CL. Juvenile violence. *Psychiatric Clinics of North American* 1999; 22:71-9
- Scott CL, Ash P, Elwyn T. Juvenile Aspects of Stalking. In *Stalking: Psychiatric Perspectives and Practical Approaches* (D.A. Pinals, Ed) (pp. 195-211), Oxford, Oxford University Press, 2007
- Sinclair HC, Frieze IH. Initial courtship behaviour and stalking: How should we draw the line. *Violence and Victims* 2000; 15: 23-40
- Sinclair HC, Frieze IH. When courtship persistence becomes intrusive pursuit. *Sex Roles* 2005; 52: 839-852
- Spitzberg BH, Cupach WR. What mad pursuit? Obsessive relational intrusion and stalking related phenomena. *Aggression and Violent Behaviour* 2003; 8: 345-375
- Tjaden P, Thoennes N. *Stalking in America: Findings from the National Violence against Women Survey*. Washington, DC, National Institute of Justice and Centers for Disease Control and Prevention, 1998
- Urbach JR, Khalily C, Mitchell PP. Erotomania in an adolescent. Clinical and theoretical considerations. *Journal of Adolescence* 1992, 15:231-240