



Patterns of Pursuit: Identifying and Responding to Stalking

3rd Annual Choctaw Nation's
Violence Against Women Act Training
November 19, 2025

OVW Funding

This project was supported by Grant No. 15JOVW-24-GK-03011-MUMU awarded by the Office on Violence Against Women, U.S. Department of Justice. The opinions, findings, conclusions, and recommendations expressed in this program are those of the author(s) and do not necessarily reflect the views of the Department of Justice.

www.StalkingAwareness.org



- Practitioner guides
- Training modules
- Victim resources
- Webinars

Sign up for our Newsletter!



@FollowUsLegally

What is Stalking?

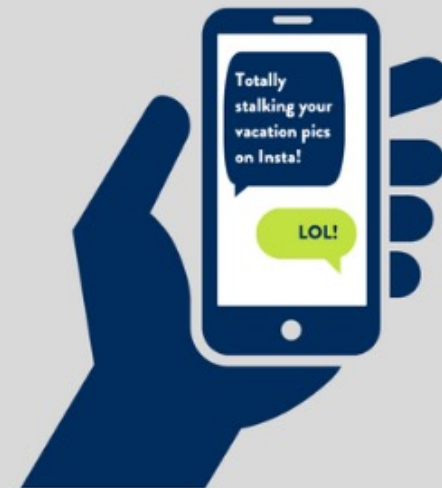


You may think of stranger danger.



You may think it only happens to celebrities.

You may think of romance.



Or maybe it's not that big of a deal.

Stalking Prevalence

NEARLY
1 in 3 women



&

NEARLY
1 in 6 men



experience **stalking** in their lifetimes.

Smith, S.G., Basile, K.C., & Kresnow, M. (2022). The National Intimate Partner and Sexual Violence Survey (NISVS): 2016/2017 Report on Stalking. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease control and Prevention.

STALKING IS:



CRIMINAL



TRAUMATIC



DANGEROUS



CRIMINAL

FEDERAL LEVEL

50 STATES, D.C., U.S. TERRITORIES

TRIBAL CODES

UNIFORM CODE OF MILITARY JUSTICE

CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

A. Any person who willfully, maliciously, and repeatedly follows or harasses another person in a manner that:

1. Would cause a reasonable person or a member of the immediate family of that person as defined in subsection F of this section to feel frightened, intimidated, threatened, harassed, or molested; and
2. Actually causes the person being followed or harassed to feel terrorized, frightened, intimidated, threatened, harassed, or molested, upon conviction, shall be guilty of the crime of stalking, which is a misdemeanor punishable by imprisonment for not more than one (1) year or by a fine of not more than One Thousand Dollars (\$1,000.00), or by both such fine and imprisonment.

CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

B. Any person who violates the provisions of subsection A of this section when:

1. There is a permanent or temporary restraining order, a protective order, an emergency ex parte protective order, or an injunction in effect prohibiting the behavior described in subsection A of this section against the same party, when the person violating the Page 219 provisions of subsection A of this section has actual notice of the issuance of such order or injunction; or
2. Said person is on probation or parole, a condition of which prohibits the behavior described in subsection A of this section against the same party or under the conditions of a community or alternative punishment; or

CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

3. Said person, within ten (10) years preceding the violation of subsection A of this section, completed the execution of sentence for a conviction of a crime involving the use or threat of violence against the same party, or against any member of the immediate family of such party, upon conviction, shall be guilty of a felony punishable by imprisonment for a term not exceeding three (3) years or by a fine of not more than Five Thousand Dollars (\$5,000.00), or by both such fine and imprisonment.

CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

C. Evidence that the defendant continued to engage in a course of conduct involving repeated unconsented contact, as defined in subsection D of this section, with the victim after having been requested by the victim to discontinue the same or any other form of unconsented contact, and to refrain from any further unconsented contact with the victim, shall give rise to a rebuttable presumption that the continuation of the course of conduct caused the victim to feel terrorized, frightened, intimidated, threatened, harassed, or molested.

CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

4. “Unconsented contact” means any contact with another individual that is initiated or continued without the consent of the individual, or in disregard of that individual’s expressed desire that the contact be avoided or discontinued. Constitutionally protected activity is not included within the meaning of unconsented contact. Unconsented contact includes but is not limited to any of the following:

- a. following or appearing within the sight of that individual,
- b. approaching or confronting that individual in a public place or on private property,

CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

- c. appearing at the workplace or residence of that individual,
- d. entering onto or remaining on property owned, leased, or occupied by that individual,
- e. contacting that individual by telephone,
- f. sending mail or electronic communications to that individual, and
- g. placing an object on, or delivering an object to, property owned, leased, or occupied by that individual;

A pattern of behavior...

- Not a single incident or “one-off” event
- Called a “course of conduct” in most statutes



CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

A. Any person who willfully, maliciously, and **repeatedly follows or harasses** another person in a manner that:

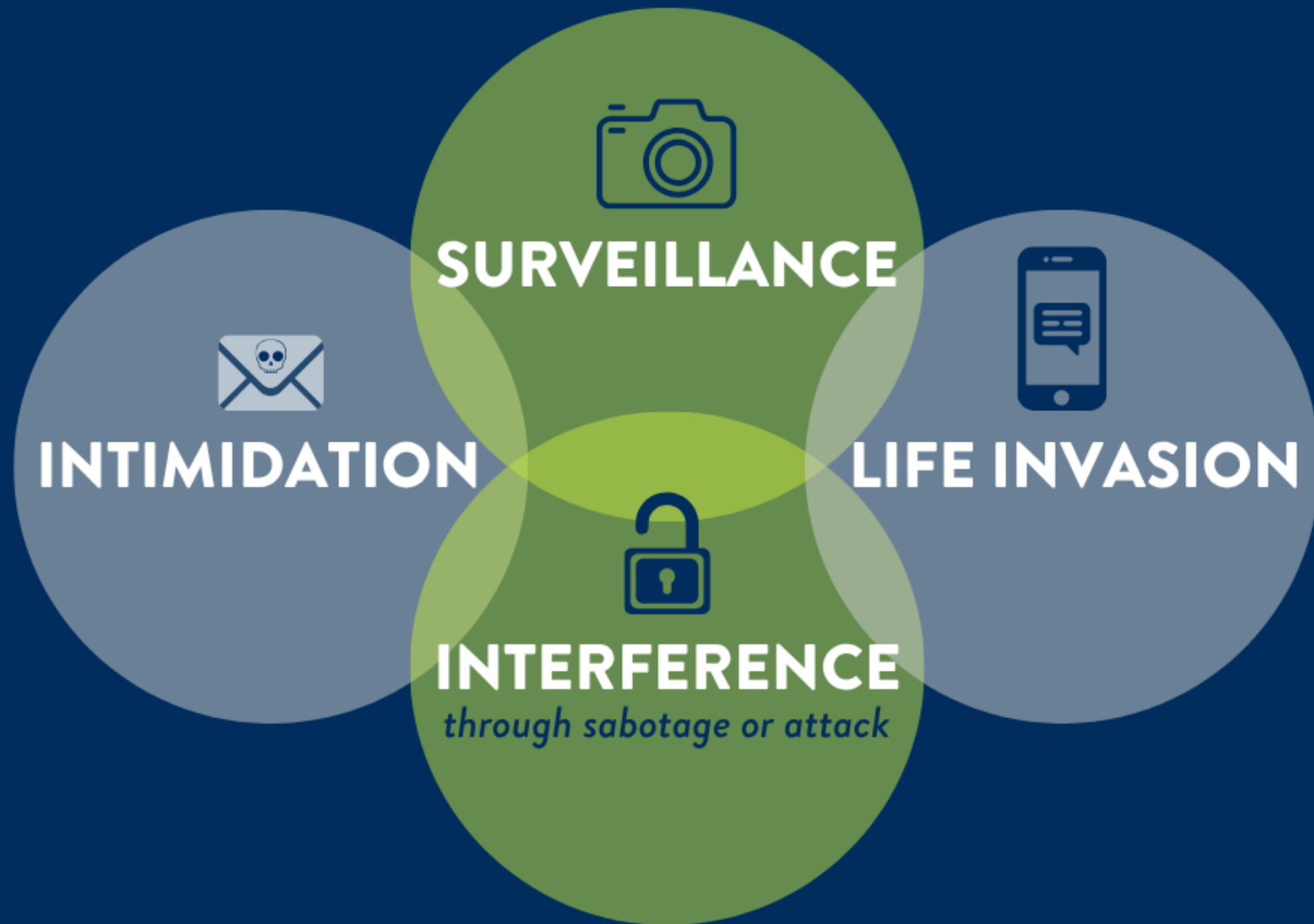
1. Would cause a reasonable person or a member of the immediate family of that person as defined in subsection F of this section to feel frightened, intimidated, threatened, harassed, or molested; and
2. Actually causes the person being followed or harassed to feel terrorized, frightened, intimidated, threatened, harassed, or molested, upon conviction, shall be guilty of the crime of stalking, which is a misdemeanor punishable by imprisonment for not more than one (1) year or by a fine of not more than One Thousand Dollars (\$1,000.00), or by both such fine and imprisonment.

CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

D. For purposes of this section:

1. “Harasses” means a pattern or course of conduct directed toward another individual that includes, but is not limited to, repeated or continuing unconsented contact, that would cause a reasonable person to suffer emotional distress, and that actually causes emotional distress to the victim. Harassment shall include harassing or obscene phone calls as prohibited by Section 1172 of this code and conduct prohibited by Section 850 of this title. Harassment does not include constitutionally protected activity or conduct that serves a legitimate purpose;

SLII Framework



Logan, TK, & Walker, R. (2017). Stalking: A Multidimensional Framework for Assessment and Safety Planning, *Trauma, Violence and Abuse* 18(2), 200-222.



SURVEILLANCE

- Follow
- Watch
- Wait
- Show up
- Tracking software
- Obtain information about victim
- Proxy stalking

LIFE INVASION



- **Unwanted contact at home, work, etc.**
- **Showing up**
- **Phone calls**
- **Property invasion**
- **Public humiliation**
- **Harass friends/family**

INTIMIDATION



- **Threats**
- **Property damage**
- **Symbolic violence**
- **Forced confrontations**
- **Threaten or actually harm self**
- **Threats to victim about harming others**



INTERFERENCE

THROUGH SABOTAGE OR ATTACK

- **Financial and work sabotage**
- **Ruining reputation**
- **Custody interference**
- **Keep from leaving**
- **Road rage**
- **Attack family/friends/pets**
- **Physical/sexual attack**

Screening for Stalking

Has the Offender...

been tracking, following, or monitoring Victim in any way?



repeatedly invaded Victim's life/privacy by initiating unwanted contact with Victim?

significantly and directly interfered with Victim's life?

- > physically/sexually assaulted Victim during course of conduct?
- > forcibly kept Victim from leaving, held against will, caused serious accident, assaulted others, or seriously attacked Victim?



more than one time, intimidated or scared Victim through threats, property damage, threatening or actual harming of pets, or other means?

Logan, TK, & Walker, R. (2017). Stalking: A Multidimensional Framework for Assessment and Safety Planning, *Trauma, Violence and Abuse* 18(2), 200-222.

...directed at a specific person...



CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

A. Any person who willfully, maliciously, and repeatedly follows or harasses **another person** in a manner that:

1. Would cause a reasonable person or a member of the immediate family of that person as defined in subsection F of this section to feel frightened, intimidated, threatened, harassed, or molested; and
2. Actually causes the person being followed or harassed to feel terrorized, frightened, intimidated, threatened, harassed, or molested, upon conviction, shall be guilty of the crime of stalking, which is a misdemeanor punishable by imprisonment for not more than one (1) year or by a fine of not more than One Thousand Dollars (\$1,000.00), or by both such fine and imprisonment.



...that would cause a
reasonable person to feel

FEAR

for their safety or the safety
of others; or suffer substantial
emotional distress.

CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

A. Any person who willfully, maliciously, and repeatedly follows or harasses another person in a manner that:

1. Would cause a **reasonable person** or a member of the immediate family of that person as defined in subsection F of this section to feel frightened, intimidated, threatened, harassed, or molested; and
2. Actually causes the person being followed or harassed to feel terrorized, frightened, intimidated, threatened, harassed, or molested, upon conviction, shall be guilty of the crime of stalking, which is a misdemeanor punishable by imprisonment for not more than one (1) year or by a fine of not more than One Thousand Dollars (\$1,000.00), or by both such fine and imprisonment.



CONTEXT IS CRITICAL
in stalking cases.

CONTEXT IS CRITICAL



- Something may be frightening to the victim but not to you
- Stalking behaviors often have specific meanings
- Stalking criminalizes otherwise non-criminal behavior



**...that would cause a
reasonable person to feel**

FEAR

**for their safety or the safety
of others; or suffer substantial
emotional distress.**

CHOCTAW NATION SECTION 1173. STALKING - PENALTIES

A. Any person who willfully, maliciously, and repeatedly follows or harasses another person in a manner that:

1. Would cause a reasonable person or a member of the immediate family of that person as defined in subsection F of this section to feel frightened, intimidated, threatened, harassed, or molested; and
2. **Actually causes the person** being followed or harassed to **feel terrorized, frightened, intimidated, threatened, harassed, or molested**, upon conviction, shall be guilty of the crime of stalking, which is a misdemeanor punishable by imprisonment for not more than one (1) year or by a fine of not more than One Thousand Dollars (\$1,000.00), or by both such fine and imprisonment.

Screening for Stalking

If YES to any of the previous, during the actions mentioned above...

Did these actions make Victim afraid or concerned for safety or safety of children, family, and/or coworkers?

Did Victim make significant life changes for safety reasons because of these actions? (Change day-to-day routines, spend money on home safety, took time off work?)

Did these actions make Victim afraid or concerned about significant financial or social impact? (Loss of job, loss of housing, financial harm?)

NOT AT ALL?

SOMEWHAT?

EXTREMELY?

Logan, TK, & Walker, R. (2017). Stalking: A Multidimensional Framework for Assessment and Safety Planning, Trauma, Violence and Abuse 18(2), 200-222.

Reasonable Fear: Evidence

Describe victim statements of fear

- Describe any accommodations made for safety

Document evidence of accommodations and/or safety measures taken:

- Time spent obtaining PO, relocation, efforts to keep address or location secret



SUBSTANTIAL EMOTIONAL DISTRESS MAY PRESENT AS:

Changing routine/appearance

Frustration, irritability,
hopelessness

Adopting self-protective behaviors

Academic/workplace
performance issues

Seeking professional help

Increased substance misuse

Issues with physical health

Nervousness, feeling
"on guard"

Increased anxiety,
depression, suicidal ideation

Difficulty eating or sleeping



Discuss: Is this stalking?

1. A student peeks into the women's locker room to watch the women undress.
2. An ex-partner repeatedly spreads vicious rumors about their former partner on social media.
3. A supervisor regularly asks her employee personal questions, mocks him in meetings, sends e-mails at odd hours and is verbally abusive when he doesn't respond right away.



TRAUMATIC

Many stalking victims:

- Experience mental health issues
- Lose time from work
 - 1 in 8 employed stalking victims lose time from work.
- Relocate
 - 1 in 7 stalking victims move.

Baum, K., Catalano, S., Rand, M. (2009). Stalking Victimization in the United States. Washington, DC: Bureau of Justice Statistics.
Blaauw, E., Arensman, E., Winkel, F.W., Freeve, A., & Sheridan, L. (2002). The Toll of Stalking. Journal of Interpersonal Violence 17(1): 50-63.

91%
OF FEMALE
STALKING
VICTIMS

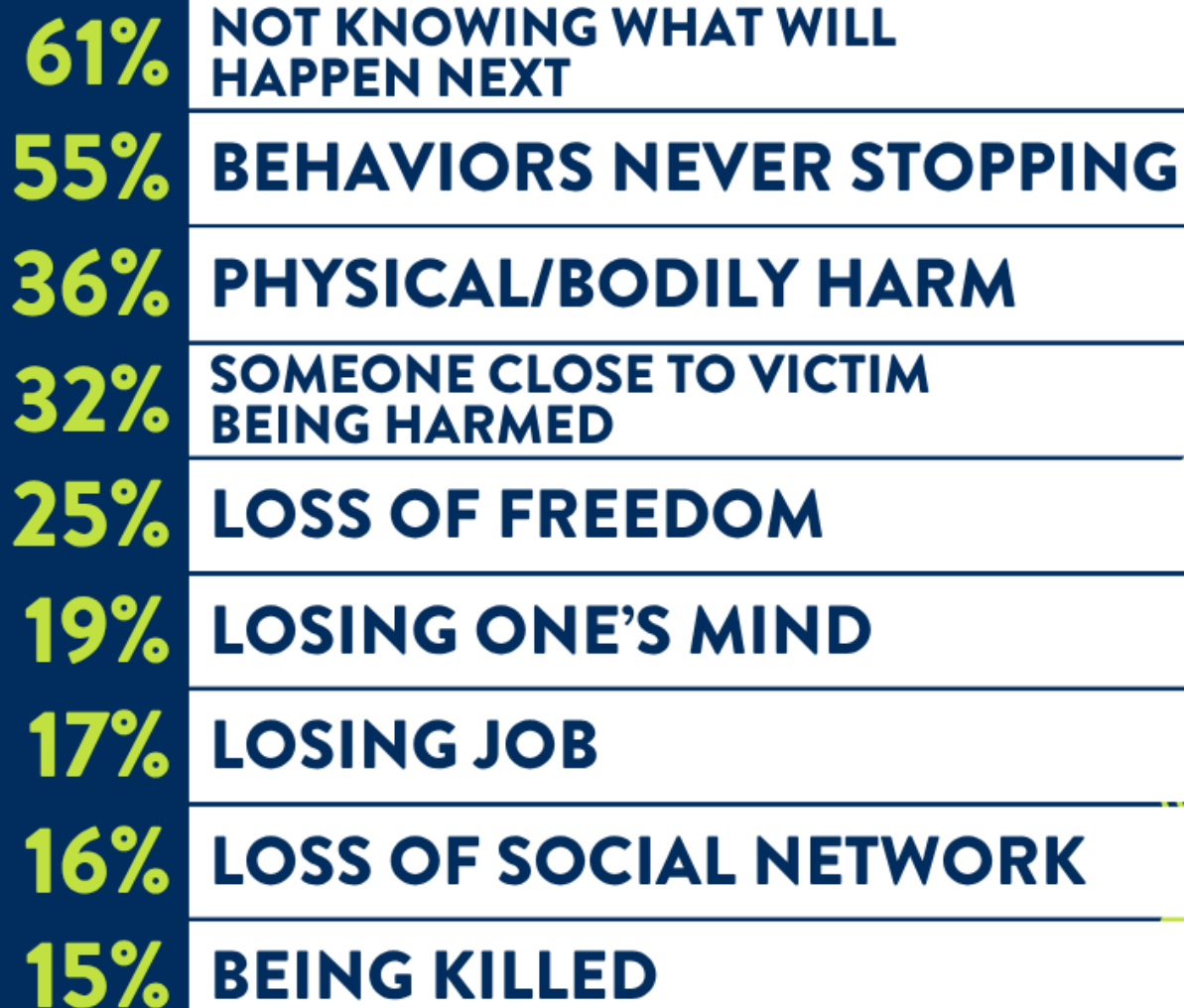
70%
OF MALE
STALKING
VICTIMS



FELT
FEARFUL,
THREATENED, OR
CONCERNED FOR SAFETY

Smith, S.G., Basile, K.C., & Kresnow, M. (2022). The National Intimate Partner and Sexual Violence Survey (NISVS): 2016/2017 Report on Stalking. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease control and Prevention.

STALKING VICTIM FEARS



Truman, J.L., & Morgan, R.E. (2022). Stalking Victimization, 2019. Washington, DC: US DOJ, Bureau of Justice Statistics, Special Report.

STALKING DURATION

**ALL STALKING VICTIMS*



18% **< 1 Month**

44% **1 Month to < 1 Year**

13% **1 Year to < 2 Years**

24% **2 Years or More**

2% **Unknown**

Truman, J.L., & Morgan, R.E. (2022). Stalking Victimization, 2019. Washington, DC: US DOJ, Bureau of Justice Statistics, Special Report.

Pattern of Behavior

$\frac{2}{3}$ of stalkers pursue their victim
at least once per week

$\frac{3}{4}$ of stalkers use more than one
means of approach

How do Stalking Victims Cope?

Move
INWARD



Move
AWAY



Move
TOWARDS



Move
AGAINST



Move
OUTWARD



Spitzberg, B.H. & Cupach, W. (2007) The State of the Art of Stalking: Taking Stock of the Emerging Literature. *Aggression and Violent Behavior* 12(1): 64-86.

“

It's not easy to describe the fear you have when you see the stalker, or signs of the stalker, everywhere you go.

**I have given up all hopes
of ever having a safe life.**

For the rest of my life, I will be looking over my shoulder, expecting to see him there.

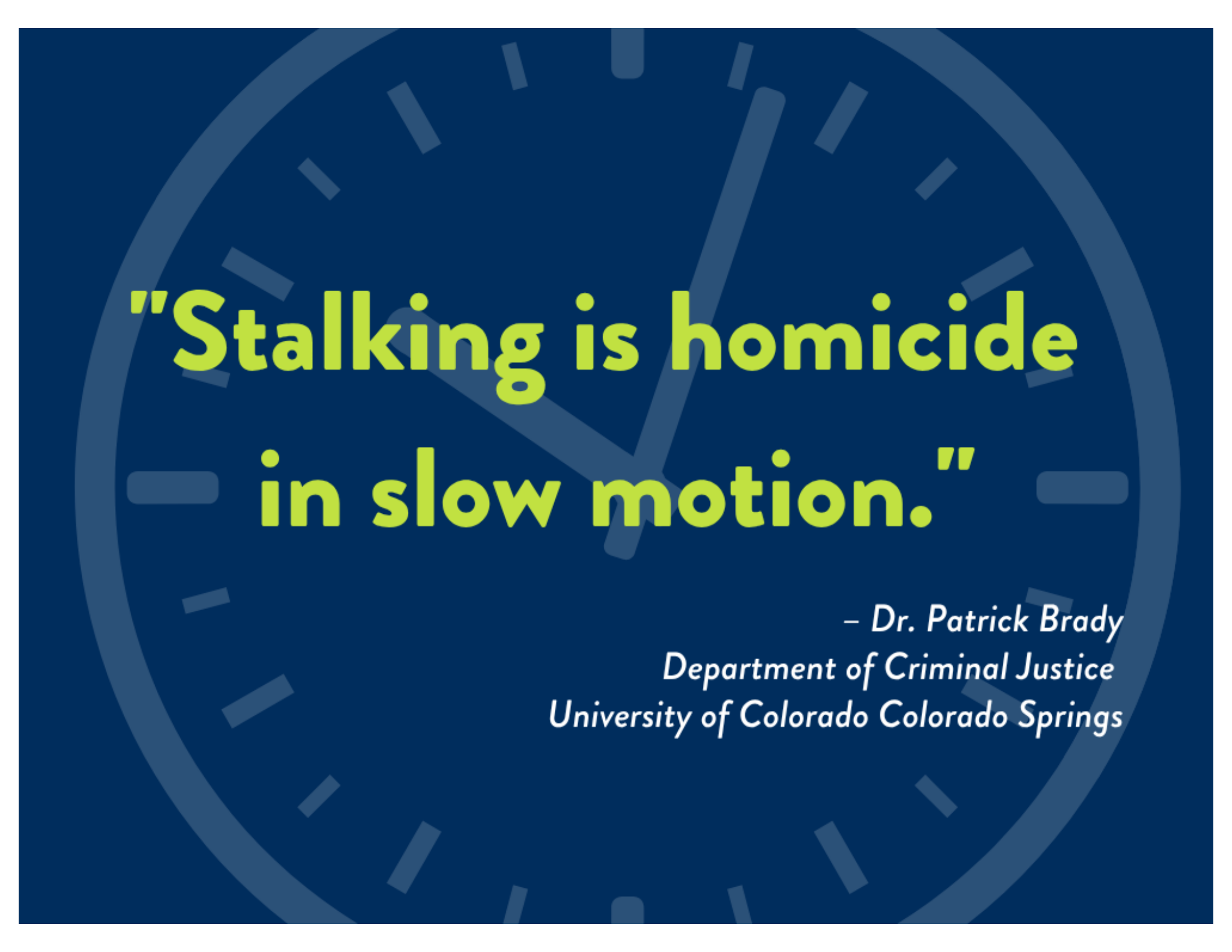
”



DANGEROUS

- Stalking often co-occurs with physical assault and sexual violence, including rape.
- 20% of stalkers use weapons to threaten or harm victims.
- 76% of intimate partner femicides included stalking in the year prior.

McFarlane, J., Campbell, J.C., Wilt, S., Ulrich, Y., & Xu, X. (1999). Stalking and Intimate Partner Femicide. *Homicide Studies* 3(4), 300-316.
Mohandie, K., Meloy, J.R., McGowan, M.G., & Williams, J. (2006). The RECON Typology of Stalking: Reliability and Validity Based upon a Large Sample of North American Stalkers. *Journal of Forensic Sciences*, 51(1), 147-155.



**"Stalking is homicide
in slow motion."**

*– Dr. Patrick Brady
Department of Criminal Justice
University of Colorado Colorado Springs*

Stalking & Dangerousness

IN ADDITION TO INTIMATE PARTNER HOMICIDE,
STALKING IS ASSOCIATED WITH:



PHYSICAL ASSAULT

SEXUAL ASSAULT

EXPLICIT THREATS

PROPERTY DAMAGE

THREATS WITH A
WEAPON

Logan, TK & Walker, R. (2017). Stalking: A Multidimensional Framework for Assessment and Safety Planning. *Trauma, Violence & Abuse*, 18(2), 200-222.

Intimate partner stalkers are more likely to:

physically approach the victim

be interfering, insulting, and threatening

use weapons

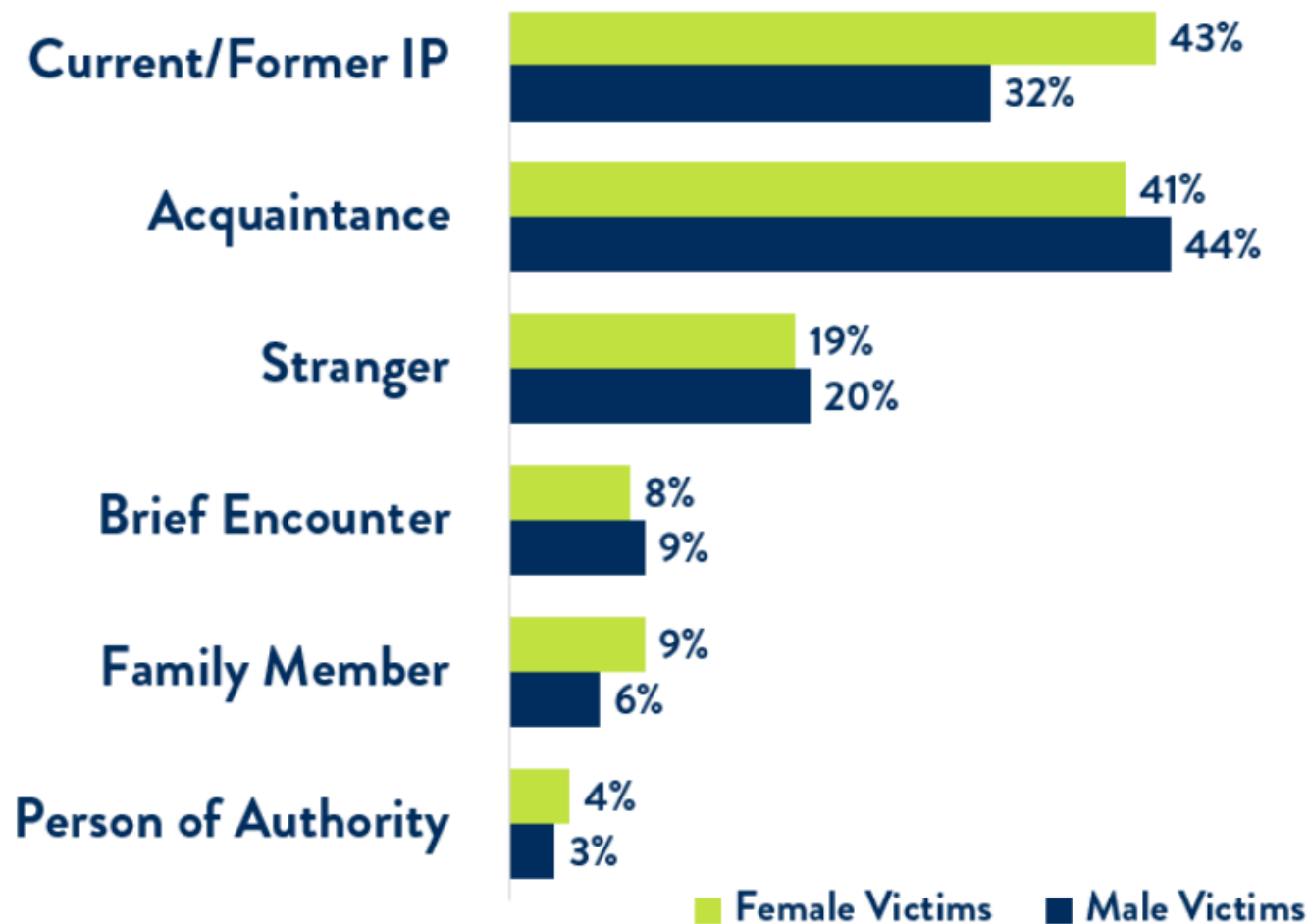
escalate behaviors quickly

re-offend

Mohandie, K., Meloy, J.R., McGowan, M.G., & Williams, J. (2006). The RECON Typology of Stalking: Reliability and Validity Based upon a Large Sample of North American Stalkers. *Journal of Forensic Sciences*, 51 (1), 147-155.

When Stalking Co-occurs with Other Victimizations

Victim and Offender Relationships



Smith, S.G., Basile, K.C., & Kresnow, M. (2022). The National Intimate Partner and Sexual Violence Survey (NISVS): 2016/2017 Report on Stalking. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention.

Co-Victimizations: Stalking & Sexual Violence

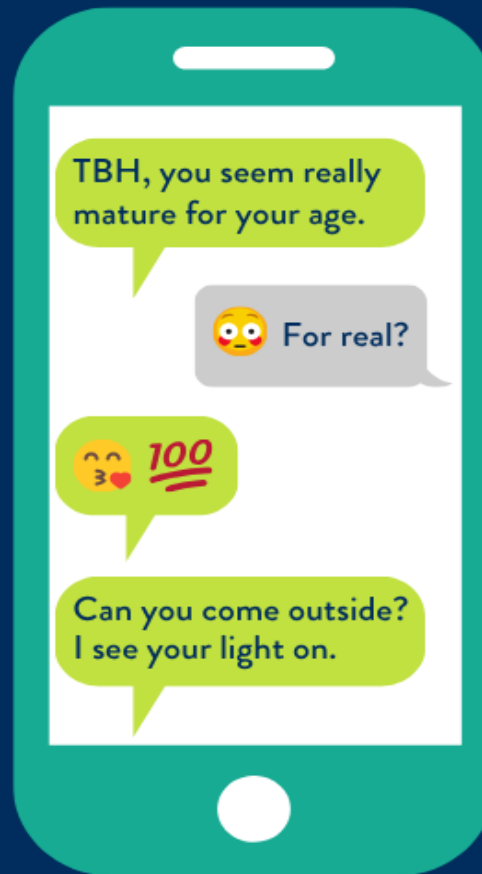
Intersections of Stalking & Sexual Violence

Stalker threatens/plans sexual violence.

Stalker attempts to get someone else to be sexually violent towards the victim.

Stalker commits sexual violence.

Stalker contacts the victim after sexual violence.



Some offenders use **stalking** strategies
to groom for sexual violence.

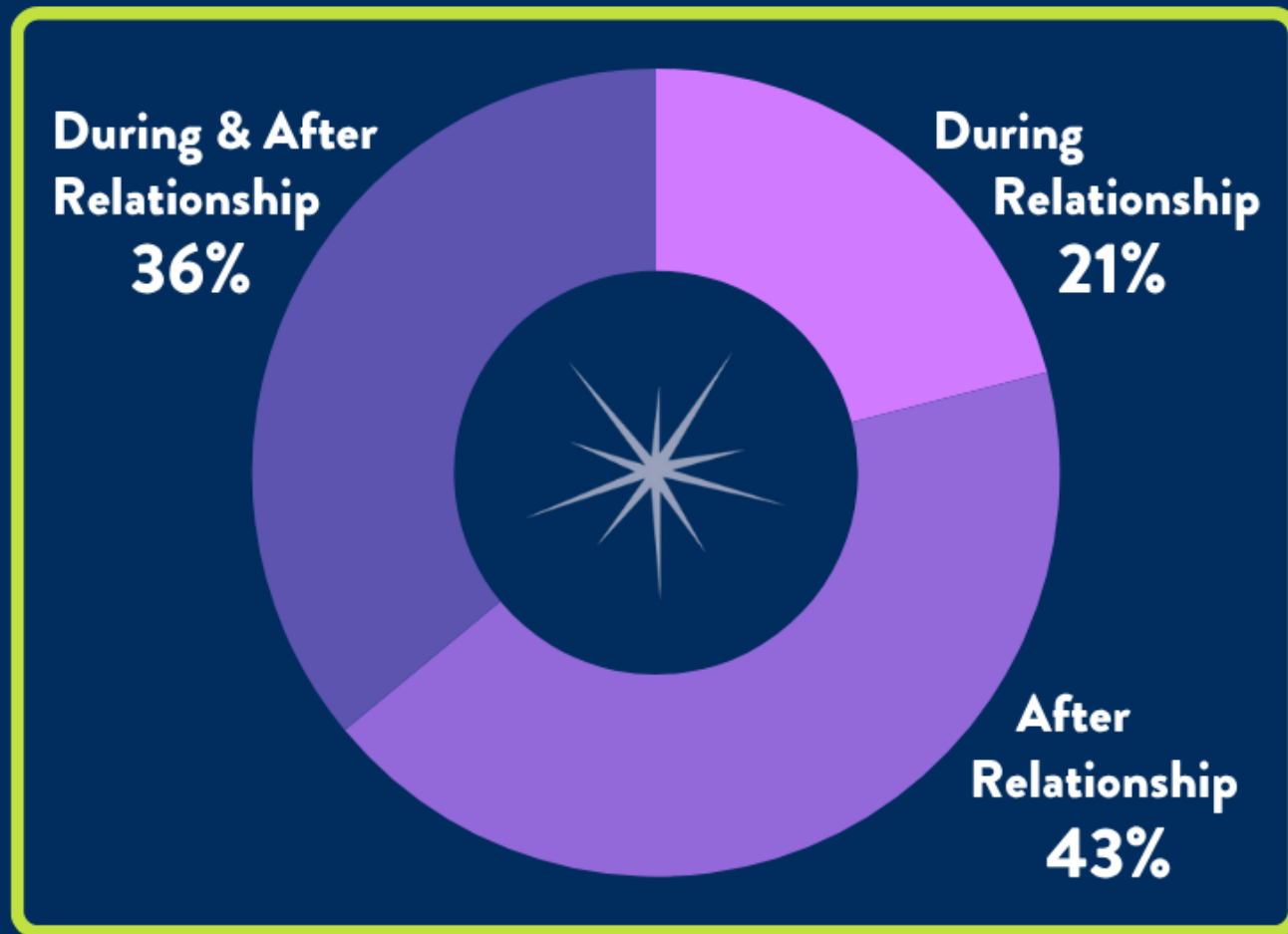
Co-victimizations: Stalking & Human Trafficking

Stalking & Trafficking

- Human trafficking often involves co-occurring stalking behaviors
 - To coerce or isolate the victim
 - To intimidate the victim or witness
- History and course of conduct
- Opportunity and motive to engage in repetitive acts in the course of targeting or maintaining control

Co-victimizations: Stalking & Domestic Violence

When does **STALKING** take place in an abusive intimate partner relationship?



Tjaden, P. & Thoennes, N. (1998). Stalking in America: Findings from the national violence against women survey (NCJ#169592). Washington, DC: National Institute of Justice CDC.

On average, intimate partner stalkers
pose the greatest threats to their victims.

WHY?





In **85%** of attempted
and **76%** of completed
intimate partner femicides,
stalking occurred in the year
prior to the attack.

Stalking via the Court System

How Offenders Use Courts to Stalk

Frivolous lawsuits	Prolonging cases	Disruption to delay	Extended proceeding	Access through filings
Abuse of system	Exposing victim	False allegations	Increasing cost	Intentional misfiling
Court applications	Repetitive filings	Surveilling victim	Intimidating victim	Access to victim

How can we help?



BEFORE
COURT

DURING
COURT

AFTER
COURT

Before Court

Determine when
victim presence is
necessary

Motions to exclude
irrelevant evidence

Objections to
continuances

Prepare victim for
proceeding with
detailed explanation

Protect victim from
abusive contact from
defense

Research and collect
alternative testimony
sources

During Court

Safe space to wait

Be prepared to hold
offender accountable

Consider ways to
leverage court room
setup

On-site advocate/
support person

Open
communication with
court officers

After Court

Consider exit plan for
victim

Consider possibilities
of sanctions or
ethical violations

Warm hand-off to
supportive services

Follow up with victim
regarding court
orders

Consider other areas
of legal relief for
victim

How Do We Identify?

VICTIM ADVISED ON TODAY'S DATE AT APPROXIMATELY 0800 HOURS WHEN SHE GOT INTO HER CAR TO HEAD TO WORK, HER CAR DOORS WERE LOCKED AND ON THE DRIVER'S SEAT WAS A CORONA BEER BOTTLE CAP.

She called the police because of a beer cap?

VICTIM ADVISED ON TODAY'S DATE AT APPROXIMATELY 0800 HOURS WHEN SHE GOT INTO HER CAR TO HEAD TO WORK, HER CAR DOORS WERE LOCKED AND ON THE DRIVER'S SEAT WAS A CORONA BEER BOTTLE CAP.

VICTIM STATED YESTERDAY SHE CELEBRATED HER TWO-YEAR ANNIVERSARY OF BEING SOBER AND SHE HAD RECEIVED MESSAGES FROM PEOPLE IN HER AA GROUP CONGRATULATING HER ON HER TWO-YEAR SOBRIETY. SHE BELIEVES THAT **SUSPECT** PLACED THE BEER CAP IN HER CAR TO MESS WITH HER EMOTIONALLY AS SEEING ANYTHING RELATED TO ALCOHOL IS A TRIGGER TO HER. SHE BELIEVES THAT **SUSPECT** IS MONITORING HER MESSAGES AS THAT IS THE ONLY WAY **SUSPECT** WOULD KNOW ABOUT THE ANNIVERSARY.

Why Name Stalking?

Charging & Prosecution

Safety Planning

Victim Empowerment

CCR Strategies



Focus on risk

> Stalking & Harassment Assessment & Risk Profile (SHARP)

Frequent multi-disciplinary case review



Comprehensive and integrated approaches

Supervision strategies (restrictions, monitoring)

> Guide for Corrections & Probation Officers



Victim safety planning

> Safety Planning Strategies guides

CCR Response

TRAINING



- SPARC training request form
- SPARC training archives

POLICIES & PROCEDURES

- SPARC guides
 - victim services
 - judicial officers
 - prosecution
 - corrections
 - law enforcement
- Individualized technical assistance



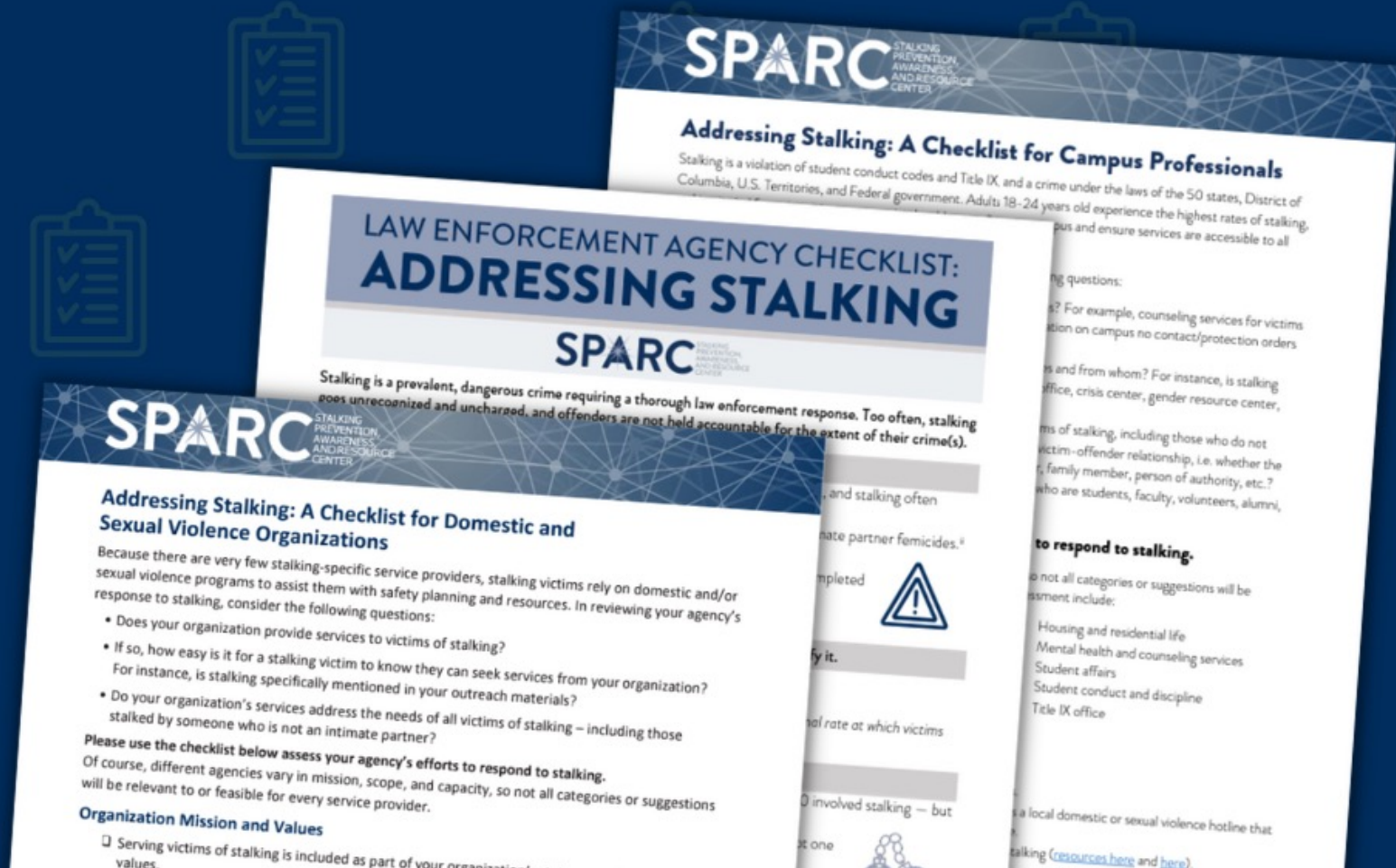
PRACTICES



- SPARC checklists
 - victim services
 - law enforcement
 - campus professionals

STALKING RESPONSE CHECKLISTS

ASSESS YOUR EFFORTS & CONSIDER NEW IDEAS



JUDICIAL OFFICER BENCH CARD: STALKING

SPARC NIWAP WASHINGTON
COLLEGE OF LAW NCJFCI

PROSECUTOR'S GUIDE TO STALKING

SPARC

STALKING
PREVENTION,
AWARENESS,
AND RESOURCE
CENTER

Stalking Safety Strategies

Stalkers can be unpredictable and dangerous. Whether in-person or through the use of technology, stalkers use a variety of strategies to invade the lives of their victims. Stalkers use multiple tactics and can escalate their behavior over time. Although the use of technology, stalkers use multiple tactics and can escalate their behavior over time. Although the use of technology, stalkers use multiple tactics and can escalate their behavior over time.

RESPONDING TO STALKING

A GUIDE FOR COMMUNITY CORRECTIONS OFFICERS

COULD THIS BE A STALKING CASE?: IDENTIFYING STALKING ON CALLS FOR SERVICE

SUPERVISING OFFENDERS: SLII BEHAVIORS



SURVEILLANCE

SURVEILLANCE is the most commonly identified stalking tactic and includes watching and gathering information about the victim, in-person or through technology.

ASK: Did the offender ever track, follow, or monitor the victim in any way?
In-person or using technology?

Surveillance behaviors include:

- ☐ Watching them from a distance
- ☐ Waiting for them outside their office, home, or another location

This can be done:

- ☐ In person
- ☐ Online
- ☐ With smart home devices
- ☐ With tracking software or GPS devices

LIFE INVASION

LIFE INVASION describes ways that the offender invades the victim's life without the victim's consent, in-person or through technology.

ASK: Has the offender repeatedly invaded the victim's privacy by initiating unwanted contact?

Life Invasion behaviors include:

- ☐ Repeated unwanted contact (phone calls, texts, messages, emails)
- ☐ Sending or leaving unwanted gifts, objects, items
- ☐ Initiating contact through third parties

STALKING CASES: LAW ENFORCEMENT INVESTIGATIONS AND REPORT WRITING

INVESTIGATING STALKING SLII BEHAVIORS

Stalking is a prevalent and dangerous crime that requires thorough investigation and documentation for all of their crimes. Victims of stalking often go unrecognized, uncharged, and/or unprosecuted for all of their crimes. Victims of stalking often go unrecognized, uncharged, and/or unprosecuted for all of their crimes.

www.StalkingAwareness.org



- Practitioner guides
- Training modules
- Victim resources
- Webinars

Sign up for our Newsletter!



@FollowUsLegally

Natalie Ivey J.D.

Training & Criminal Justice Specialist



202-815-8371



NIvey@StalkingAwareness.org



StalkingAwareness.org

Training Evaluation



SPARC STALKING
PREVENTION,
AWARENESS,
AND RESOURCE
CENTER



@FollowUsLegally