Stalking, Intimate Partner Abuse, and the Police

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Abstract: Stalking and intimate partner abuse (IPA) are two criminal problems that often come to the attention of the police. While there are many similarities between intimate partner stalking and IPA and many refer to intimate partner stalking as a variant of IPA (Logan, Leukefeld, and Walker, 2000), there may be differences in these cases, particularly at the point that they come to the attention of the police. These differences may have important implications for how the police respond and/or are able to respond. Using a sample of 1440 domestic disturbance reports from a large police department in the western United States, this study explores the differences and similarities between these two populations including a discussion of how these problems impact arrest with an end goal of aiding police in the appropriate response to these two criminal problems and adding to the literature on stalking in the context of intimate partner abuse and intimate partner abuse. Ultimately, both differences and similarities were found. Implications are discussed.

INTRODUCTION

Stalking and intimate partner abuse (IPA) are two criminal problems that often come to the attention of the police. Stalking and IPA are highly correlated (Coleman, 1997) and when it is, is often referred to as stalking in the context of IPA. While stalking is a criminal problem in its own right with anti-stalking statutes in most jurisdictions, in many places the criminal justice response to stalking in the context of IPA is to treat it as IPA (Melton, 2004; Tjaden and Thoennes, 2000). While there are many similarities between intimate partner stalking and IPA and many refer to intimate partner stalking as a variant of IPA (Logan, Leukefeld, and Walker, 2000), there may be differences in these cases, particularly at the point that they come to the attention of the police. These differences may have important implications for how the police respond and/or are able to respond. In an effort to aid police in their response to these two criminal problems, these differences in this particular population (i.e. cases coming to police attention) must be known. Additionally, the impact these two problems have on police response needs to be explored. Finally, little research explores the criminal justice response to stalking in the context of IPA. This study adds to this little research, specifically exploring the police. Thus, this research will describe these differences and discuss the implications for police response to intimate partner stalking and IPA.

Research on Stalking and It Relationship to IPA

Stalking refers to the willful, repeated, and malicious following, harassing, or threatening of another person (Coleman, 1997). Estimates of stalking range from 200,000

to 1.4 million victims annually (Roberts and Dziegielewski, 1996; Tjaden , 1997; Tjaden and Thoennes, 1998; USDOJ, 1998). The majority of stalking incidents involve individuals who are or were intimates or acquainted, and a high correlation exists between stalking and intimate partner abuse. Some estimate that as many of 80% of all stalking cases involve people who are or were intimately involved (Coleman, 1997; Roberts and Dziegielewski, 1996). Previous research has indicated a significant relationship between stalking and intimate partner abuse (see Coleman, 1997; Davis and Frieze, 2000; Logan, Leukefeld, and Walker, 2000; Mac Farlane, Campbell, Wilt, Sachs, and Xu, 1999; Mechanic, Uhlmansiek, Weaver, and Resick, 2000; Mechanic, Weaver, and Resick, 2000; Melton, 2007; Tjaden and Thoennes, 2000; White, Kowalski, Lydon, and Valentine, 2000). For example, Tjaden and Thoennes (1998) reported that 80% of the victims of stalking in their study reported having been physically assaulted by the partner that later stalked them. Some estimate that between 29% and 54% of all female murder victims are battered women, and in 90% of these cases stalking preceded the murder (Guy, 1993; USDOJ, 1998). Melton (2007) found that over 90% of the battered women in her study had experienced some stalking behaviors in addition to physical abuse. These and other findings have lead many researchers to conclude that stalking when it occurs in this context is a variant of intimate partner abuse (Logan, Leukefeld, and Walker, 2000).

Research on the Criminal Justice Response

IPA

Historically, intimate partner abuse was viewed as a private matter in which the criminal justice system had little interest and took little action unless the violence resulted in serious injury or death (Brown, 1984; Dutton, 1995). Thus, the policy of both law enforcement and court-processing was one in which IPA was largely ignored (Friedman and Shulman, 1990). In the 1970s and 1980s, amidst pressure from

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battered women's advocates and feminist proponents for the criminalization of this problem; in response to numerous law-suits that held the police legally liable for inaction in IPA cases; and in response to research being conducted that appeared to advocate for the full criminalization of the problem of IPA; many criminologists, criminal justice personnel, and politicians began to advocate for arrest as the appropriate response to cases of IPA. Today, the majority of jurisdictions in the United States have some form of presumptive or mandatory arrest law in which officers called to IPA incidents must arrest someone if they have probable cause (Melton, 1999). Regardless, police still maintain some discretion over who to arrest and many IPA incidents that come to police attention do not end up in an arrest (Dichter, Marcus, Morabito, and Rhodes, 2011).

Certainly much research in the area of IPA and the police response has focused on what predicts the police response. Most studies have confirmed that incident-level factors appear to have the most impact on police response. Specifically, the more severe the violence, if there are injuries, and if there is a weapon present (Bachman & Coker, 1995; Belknap, 1995; Eitle, 2005). Other studies have found conflicting findings on extralegal factors influencing police arrest. For example, some studies have found victim-offender relationship being important (i.e. more likely to arrest if they are not married (Belknap, 1995), while other studies have found the opposite (Dichter, Marcus, Morabito, and Rhodes, 2011). Other studies have focused on police organizational factors (Chappell, MacDonald, & Manz, 2006; Eitle, 2005; Finn, Blackwell, Stalans, Studdard, & Dugan, 2004) and community factors (Logan, Walker, and Leukefeld, 2001).

Stalking

The criminal justice response and understanding of the criminal problem of stalking has been even more recent. In response in part to a series of homicides of women that were all preceded by the stalking of the victims, the first anti-stalking statute was implemented in California in 1990 (Guy, 1993). Today, all states and the District of Columbia have anti-stalking statutes on their books (USDOJ, 1998). Little research has explored the criminal justice response to stalking. Even less has looked specifically at the criminal justice response to stalking in the context of IPA. As stated previously, while stalking is a criminal problem in its own right with anti-stalking statutes in most jurisdictions, in many places the criminal justice response to stalking in the context of IPA is to treat it as IPA (Melton, 2004; Jordan, Logan, Walker, and Nigoff, 2003; Tjaden and Thoennes, 2000). For example, Tjaden and Thoennes (2000) in a review of domestic violence police reports, 1 in 6 showed evidence of stalking, yet only 1 of the 1,785 reported cases carried the charge of stalking. The rest were charged as domestic violence (Tjaden and Thoennes, 2000). Moreover, many victims of stalking are encouraged to deal with the problem civilly rather than criminally by being encouraged to file for and obtain protective orders against their stalkers.

One study that specifically examined this population of stalking victims with experience with IPA as well (Melton, 2004) found that intervention in IPA did not necessarily impact future stalking, victims who experienced both stalking and IPA were more likely to state that they would use the

system in the future than victims of IPA alone, and that most victims of stalking and IPA were unsatisfied with how the criminal justice system dealt with their cases of stalking. Brewster (2001) found that former intimate partner victims of stalking typically tried extralegal solutions to deal with their stalking before contacting the police, however, eventually most contacted the police. Of the victims who contacted the police, the police did not make an arrest in the majority of the cases. Of those that contacted the police, most ended up filing protective orders against their stalkers. Victims were more likely to contact the police, the older they were, the higher their education, and if there was violence or the threat of violence. In more than half of the cases where protective orders were sought, the stalking did not diminish. And, finally, the majority of the victims were frustrated with the police response to their stalking, particularly with POs from other jurisdictions and the advice they were given to adjust their lives as opposed to actively pursuing their stalker (Brewster, 2001). Finally, Reynes and Englebrecht (2010) comparing stalkers known to the victim to those unknown to the victim and the criminal justice response found that victims who knew their victims were much less likely to contact the police (unless in cases of cyberstalking). Little research has explored what predicts arrest in cases of stalking in the context of IPA.

This study attempts to describe and analyze this population of stalking victims (i.e. victims with experiences with stalking and IPA that come to the attention of the police) and compare them to victims who just experience IPA. Considering that both of these populations come to the attention of the police, the differences and similarities between them must be explored. Moreover, it is pertinent that police be fully aware of the differences and similarities between these groups in order to aid them in employing the appropriate response. Additional emphasis will be placed on exploring the impact these two problems have on police action (i.e. how are violence and stalking are related to whether or not the police arrest in cases involving intimate partners).

METHODOLOGY

The data used were a combination of quantitative and qualitative data from a police department in a large, western metropolitan area. Included are all police-classified domestic relation incidents reported to the police in 2003. Only cases where the offender and the victim were involved in a current or former heterosexual relationship were included (thus child-parent, parent-child, sibling, roommates, and same-sex relationships were excluded)[1]. The final study sample was composed of 1440 domestic disturbance cases.

As stated above, both quantitative and qualitative data was used. This includes data entered by the police into check boxes at the time of the report as well as the qualitative narrative reported by the police at the scene. This narrative was combined with the already supplied quantitative data and recoded by trained researchers into the data set[2]. The research-

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[1] IRB (#12110) approval was granted to study those over 18.
[2] Over the course of the study, ten researchers/coders were involved in the coding of the qualitative data. Each coder received extensive training and a detailed codebook, including a modified CTS and SBC scales. Moreover, the coders met weekly to discuss cases and issues and were in constant contact via email. The author closely supervised and checked the coders work to ensure inter-coder reliability.

ers read the narrative and determined the victim-offender relationship, the types of behaviors in the incident, whether or not children were present or witness were present, and so on. Variables recoded in this manner and used in this analysis include: victim-offender relationship, threats, evidence of verbal abuse, evidence of prior violence (i.e. if any prior incidents were mentioned by the parties involved or the police at this incident), alcohol or drugs present, victim scared for safety, offender present when police arrived, presence of and type of violence (using a modified conflict tactics scale—Straus, 1979), presence of and type of stalking (using the Stalking Behavior Checklist, SBC), (Coleman, 1997) and whether or not the offender was arrested or issued a warrant for their arrest. Each of these variables were coded (0) for no and (1) for yes. Variables included in the quantitative data provided by the police include gender and age of the offender.

Descriptive statistics on this population of IPA and/or stalking victims are provided. Additional multivariate analysis (logistic regression) was conducted with whether or not there is stalking and whether or not the offender was arrested as the dependent variables in the models.

Numerous limitations of this data must be addressed. The major limitation is that data is dependent not only on *what* gets reported to the police (i.e. much domestic violence is never reported), but also on *how* it gets reported by the responding officer. For example, some reports are much more detailed than others. This does not necessarily mean that certain behaviors did not occur in the incident. It may just mean that certain police officers did not ask about them. One example would be drug or alcohol use present at the scene. The data is dependent upon officer's making note of this. This may only happen if it is obvious or if one of the parties interviewed mentions it, but that does not necessarily mean that it was not present. Moreover, the data are dependent on how they were *classified* by responding officers. In other words, the data depend on how the officer report "offender," "victim" or other classifications. Moreover, it should be noted that many variables are missing from the police data (i.e. offender/victim race/ethnicity, income, employment, etc…). Thus, these variables are not included in the analysis. However, while this is a limitation, there is so little research on this topic that it is important to study regardless. Issues of inter-coder reliability might be raised. A number of people were involved with the coding of the data so some caution should be used. However, multiple steps were used to insure that this data is valid. The coders had regular meetings, daily contact, and an extensive codebook and instruction book. Lastly, while the topic for this study is stalking, the stalking variable is limited. Given the data covers incidents reported the police, only what occurred in this incident are known. Thus, stalking is said to be occurring if only one stalking behavior is present at this incident. This is better measure of stalking behaviors rather than stalking since stalking by its very definition must be repeated in order to be classified as stalking. However, once again this is still important to explore since these are the cases (and how they come) that receive police attention. Most often the police response is based on what specifically happened in this once incident, so

it is important that the characteristics of these incidents are known and explored. In spite of these limitations, police data continue to be an important data source; they are a good source for understanding cases that come to the attention of the police, how police view and report cases, and the actions that police take in dealing with domestic disputes. Given the paucity of research on this specific topic, this study should be seen as a starting point to guide future research in much greater detail and in more nuanced ways than was possible with this data.

RESULTS

Table **1** presents the overall sample and incident characteristics. The majority of the offenders are male with an average age of 41.8 years old and in an intimate relationship with the victim at the time of the incident. In over one third of the incidents, children were mentioned, witnesses were present, and the offender was present when the police arrived. Over half of the cases had evidence of verbal abuse. In around 1/4th of the cases, reports mentioned that the victim was scared. Threats and drugs and/or alcohol were apparent in over 17% of the cases. There was evidence of prior violence in over one third of the cases. There was violence in over 39% of the cases (of those almost half involved injury) and there was evidence of at least one stalking behavior in over one-fourth of the incidents. The police arrested offenders in 11.6% of the incidents.

Table 1.   Sample and Incident Characteristics

Variables		n (%)
Gender	N=820	
Male		709 (86.4%)
Female		111 (13.5%)
Relationship Status	N=1440	923 (64.1%)
Age		19-87 (41.8 mean)
Children		559 (38.8%)
Witnesses		582 (40.4%)
Offender Present		550 (38.2%)
Drugs/Alcohol		247 (17.2%)
Victim Scared		355 (24.7%)
Threats		257 (17.8%)
Verbal Abuse		782 (54.3%)
Prior Violence		506 (35.1%)
Violence		570 (39.6%)
Injuries	N=570	279 (48.9%)
Stalking Behaviors		402 (27.9%)
P.O. Broken		252 (17.5%)
Police Arrest		167 (11.6%)

Table **2** presents the findings on the specific incidents of stalking and violence. As stated above, over 1/4th (27.9%) of the respondents experienced some stalking behavior. By far the most common was unwanted calls (46.5%). The next most common was experiencing the offender coming unwanted (40.3%). Others experienced other stalking behaviors (20.6%) that could not be classified on the SBC; received unwanted messages (15.9%); were followed or watched (11.4%); had their car or home broken into (7.5%), and had a new partner threatened or harmed (5.0%). Very few were checked up on (3.7%), received unwanted email (2.5%) or had their mail stole or read (0.2%). In terms of violence, 39.6% of the sample experienced some violence. The most common violent behavior was pushed or shoved (34.7%), hit with a fist (25.4), grabbed (23.7%), or slapped (13.5%).

Table **3** shows results from logistic regression analyses with whether or not there was stalking at the incident as the dependent variable. To summarize, in terms of whether or not there is stalking at the incident, there is significantly more likely to be stalking at the incident if there is evidence of prior violence, threats being made and if the parties are no longer in a relationship. There is significantly less likely to be stalking if the offender is present when the police arrive, there are drugs or alcohol present at the incident, if the victim is scared, if there is verbal abuse, or if there was violence at the incident. Thus, some important differences between the population that experiences IPA and stalking and the population that just experiences IPA emerged.

Table **4** shows the logistic regression results predicting arrest for cases involving violence and for cases involving stalking, separately and together. In cases where there is violence at the incident (Model 1), the chances of an arrest are increased if the offender is present, if drugs and alcohol are present, if there are injuries, and if there is evidence of stalking at this incident. In terms of cases involving stalking at the incident in which the police were called (Model 2), the odds of an arrest occurring increase if the offender is present, drugs and alcohol are present, and if there is evidence of prior violence. Interestingly, violence does not impact the odds of arrest. Finally, including stalking and violence (Model 3), the odds of an arrest occurring increase if the offender is present, there are drugs and alcohol present, there is evidence of prior violence, there are injuries, and there is stalking. When controlling for other variables, violence does not increase the odds of an arrest occurring.

DISCUSSION

Some significant differences between the incidents of intimate partner stalking and IPA that come to the attention of the police were found. First, it should be noted that more cases came to police attention that involved violence than stalking. This continues to be an important variable that predicts police involvement in these cases. While prior research has indicated that stalking victims are willing to call the police (Brewster, 2001; Melton, 2004), experiencing violence or the threat of violence may still be an important impetus for women seeking legal intervention (Brewster, 2001). It should also be noted that the majority of the cases involved either violence or stalking behaviors, not both. Once again, this illustrates that the police need all the information at their disposal in order to make informed decisions on how to re-

Table 2.   Specifics on Stalking and Violence at Incident

	N(%)
Stalking	**402 (27.9%)**
Broke into Home or Car	30 (7.5%)
Stole/Read Mail	1 (0.2%)
Came Unwanted	162 (40.3%)
Threatened/Harmed New Partner	20 (5.0%)
Made Unwanted Calls	187 (46.5%)
Left Unwanted Messages	64 (15.9%)
Sent Unwanted Email	10 (2.5%)
Sent Unwanted Gifts, Photos, or Letters	7 (1.7%)
Checked Up On	15 (3.7%)
Followed or Watched	46 (11.4%)
Other Stalking Behaviors	83 (20.6%)
Violence	**570 (39.6%)**
Tore	24 (4.2%)
Pushed or Shoved	198 (34.7%)
Grabbed	128 (23.7%)
Slapped	77 (13.5%)
Pulled Hair	36 (6.3%)
Bit	15 (2.6%)
Hit with Fist	145 (25.4%)
Kicked	34 (5.9%)
Threw Something	51 (8.9%)
Hit with Object	36 (6.3 %)
Tried to Hit with Object	20 (2.5%)
Twist Arm or Leg	8 (1.4%)
Drove Recklessly	12 (2.1%)
Choked	45 (7.8%)
Burned	0 (0)
Tied Up	5 (0.8%)
Beat Up	29 (5.0%)
Raped	2 (0.3%)
Threatened with a Knife	12 (2.1%)
Threatened with a Gun	2 (0.3%)
Stabbed	4 (0.7%)
Shot	0 (0)
Other Violence	164 (28.7%)

Table 3.   Logistic Regression with Whether or Not There was Stalking at the Incident as Dependent Variable

	Model 1	
	B	**S.E.**
Relationship Status	-1.411	0.212***
Offender Age	0.011	0.010
Children	-0.017	0.218
Witnesses	0.211	0.220
Offender Present	-1.048	0.268***
Drugs/Alcohol	-0.895	0.341**
Victim Scared	-0.645	0.244**
Threats	0.601	0.257*
Verbal Abuse	-0.879	0.229***
Prior Violence	0.842	0.222***
Violence	-2.352	0.279***
Injuries	-0.370	0.369
Pseudo R Squared		0.447

*p≤. 05, **p≤.01, ***p≤.001

spond to these two problems, particularly if the traditional response has been to respond to stalking in the context of IPA in the same way as IPA. Moreover, this is more potential evidence that stalking is a variant of IPA that typically occurs after the violence has stopped (Logan, Leukefeld, and Walker, 2000).

In terms of the differences found through logistic regression, stalking cases were significantly more likely to involve threats, people no longer in relationships, and people with a history of prior violence. These findings potentially have important implications based on findings from other studies. For example, given that stalking is more likely to occur among people who are no longer together and who have a history of violence, this is more potential evidence that stalking is a variant or continuation of IPA once the relationship has ended (Logan, Leukefeld, and Walker, 2000). Indicating, in turn, the import of being able to predict which relationships are those that are most likely to end up in a continuation of the IPA through stalking. The ability to do this would greatly add in the ability to effectively engage in prevention and intervention strategies. Moreover, these findings indicate that more research is needed on these two important topics. For example, the finding about alcohol/drugs being more prevalent in IPA relationships as opposed to stalking IPA relationships is in contrast to prior research on these two problems (Melton, 2007).

In terms of the police action, this study found that the biggest predictor of whether or not the police arrested was whether or not the offender was present when the police arrived on the scene. Neither violent offenders nor stalking offenders were likely to be present. Given that this is to be likely with this type of crime, police must be trained to take other factors into consideration when deciding what action to take. Moreover, the very nature of stalking (i.e. many cases involve harassment over the phone, etc…) implies that most often offenders are not going to be present. This means that

Table 4.   Logistic Regression with Arrest as the Dependent Variable

	Model 1 Violence		Model 2 Stalking		Model 3 Both	
	B	**S.E.**	**B**	**S.E.**	**B**	**S.E.**
Relationship Status	0.085	0.437	0.210	0.246	0.176	0.208
Offender Age	-0.006	0.016	0.022	0.019	-0.003	0.011
Children	-0.102	0.355	-0.667	0.405	-0.405	0.244
Witnesses	0.175	0.345	0.051	0.380	0.326	0.234
Offender Present	2.898	0.377***	3.718	0.530***	3.049	0.286***
Drugs/Alcohol	0.809	0.351*	1.954	0.666**	1.025	0.286***
Victim Scared	0.182	0.387	-0.507	0.446	0.106	0.265
Threats	-0.289	0.424	0.019	0.476	-0.198	0.296
Verbal Abuse	0.233	0.381	-0.517	0.405*	-0.140	0.265
Prior Violence	0.563	0.383	1.007	0.434*	0.780	0.258*
Injuries	1.232	0.363**	0.550	0.945	1.316	0.344***
Stalking Behaviors	2.165	0.548***			1.952	0.354***
Violence			0.880	0.720	-0.084	0.342
Pseudo R Squared		0.217		0.262		0.207

*p≤. 05, **p≤.01, ***p≤.001

police must take extra steps to ensure that they are imple-menting the most appropriate response. Ultimately, because of the nature of stalking in the context of IPA this could have serious implications. For police "inaction" in these cases could have serious consequences for victim's safety and per-ception of and satisfaction with the police. This is important because if victims are not satisfied with how the police re-spond in their cases, they may be less likely to use the police in the future. Police were significantly likely to arrest if ei-ther violence or stalking was present, but they were slightly more likely to arrest with stalking present. They were more likely to arrest when alcohol/drug abuse is present (supports prior research, see Dichter, Marcus, Morabito, and Rhodes, 2011) and if there was evidence of prior violence. Interest-ingly, each of of these variables is associated with *either* violence *or* stalking, typically not both. Moreover, they were significantly more likely to arrest is there were injuries re-ported. This has clear implications for stalking cases given that those cases are less likely to involve violence and thus less likely to end up with an injury. This research indicates that police are taking at least some of the incident character-istics into account, supporting some prior research. Finally, the victim-offender relationship did not have any significant relationship with whether or not the police arrested. This contradicts some prior research (Belknap, 1995; Dichter, Marcus, Morabito, and Rhodes, 2011) and indicates that per-haps police are receiving more training concerning some of the dynamics involved in these relationships. However, as prior studies have indicated the import of victim-offender relationship in police decision making, the fact that there were differences between these two groups regarding victim-offender relationship (i.e. in cases involving stalking the par-ties more likely to no longer be in a relationship) could con-tinue to have implications for the police response and should continue to be explored.

Arrest was additionally looked at separately for cases that involved violence at this incident or cases that involved stalking at the incident. While some similar variables pre-dicted arrest in each case (i.e. whether or not the offender and drugs/alcohol were present), some important differences emerged. While whether or not stalking behaviors were pre-sent in cases involving violence increased the chance of an arrest taking place for cases involving violence, violence at the incident did not increase the chance of an arrest occur-ring in cases involving stalking. Prior violence, however, did. While not specifically testing the import of protective orders, the finding that evidence of prior violence increases the odds of arrest in incidents involving stalking indicates that police may be more likely to treat more seriously cases where this is some history of violence, something that would be important in the enforcement of protective orders. This potentially indicates the import of continuing to encourage victims of stalking in the context of IPA to obtain restraining orders. Interestingly, verbal abuse present in incidents in-volving stalking decreased the odds of an arrest occurring. While this could be for many reasons and must be explored in more detail, it could potentially present evidence of police "downgrading" stalking cases to a mere non-criminal verbal argument. Once again, this response to this problem could have serious implications for victims of stalking. If their needs are not being meet by the police, then they may be

much less likely to utilize them the next time they need them, which could potentially have life- threatening conse-quences. Thus, police must receive better training about the dynamics of these two serious criminal problems in order to ensure they are implementing the most appropriate response. As stated previously, very little research has explored predic-tors of arrest in cases involving stalking in the context of IPA. This adds to the little research available on this topic and the differences suggest the import of studying it sepa-rately from cases involving actual violence.

CONCLUSION

Police need to understand these differences in order to implement the most appropriate response in these cases and to understand what obstacles they may face when responding either to intimate partner stalking or IPA. Police need more and better training in the dynamics of these two problems. For example, cases involving either violence or stalking should potentially have arrest as an appropriate response and the presence of one or the other should not necessarily be a factor. Police must be encouraged to take situational charac-teristics into consideration in arrest decisions as opposed to basing their decision on the presence or lack of presence of the offender at the scene and then be given the resources to be able to do this. Finally, more research is needed that ex-plores these issues and thus enable police to be more effec-tive at both prevention and intervention in these cases. As found, a large number of these cases included repeat victim and offenders. Thus, if the police had knowledge and re-sources to help predict which of the cases they see are likely to end of continued violence or stalking, they would be much more effective. Failure of the police to employ adequate re-sponses to these two problems can have very detrimental effects on those victims experiencing IPA and/or stalking in the context of IPA. In conclusion, while the data used here do have some limitations and caution should be advised in generalizing the results, this is an important topic with clear policy implications and this article should serve as a guide for future research examining cases involving IPA alone versus IPA with stalking that come to the attention of the police.

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