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Research Article

STALKER HARASSMENT; CASE REPORT

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ABSTRACT

Stalking is defined as the act of determining the person as a target and following and communicating with the person repeatedly without his/her consent, creating concern for her safety. Compared to forensic medicine applications, it's a group that is relatively common in the field of psychiatry, and reporting the results of forensic medical evaluation is rarely done in this respect. The case applied to the clinic with the allegation of mobbing, and besides it's a rare case in forensic medicine practice due to the characteristics of the event she experienced, it was aimed to discuss the evaluation to be made in such cases in terms of stalking.

The 33-year-old female case, working in a company as senior manager, stated that she didn't accept the proposal of a male employee in another city and in the same position as her, to be her girlfriend and she was verbally threatened by this person afterwards, wandered around her workplace and home and followed her for a long time. In her mental evaluation; It was found that the person was subjected to psychological violence and stalking harassment; the verbal threats and behaviors of the aggressor had a traumatic effect on her mental health for a long time and the action she was exposed to permanently deteriorated the mental health of the person.

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Stalking is addressed in different areas within the framework of mobbing or violence against women. Considering that in cases of stalking harassment, which doesn't have a specific legal provision, it may result in the most severe form of violence against women due to its consequences, besides studies on prevention and legal regulation, as highlighted in the case presented, the identification of trauma and forensic medical documentation and also the need for psychiatric follow-up and support in terms of treatment should be considered.

Keywords: Stalking harasser, Stalking, Mental trauma, Forensics.

1. INTRODUCTION

Stalking, a relatively recent term in the literature, is defined as the behavior of a person following another person without their consent, in a way that make them worry about their security and creates fear, and communicates both personally and through various communication tools (phone, letter, internet, etc.) (Türkoğlu et al, 2019; Pathe and Mullen, 1997; Mester and Mirger, 2006). Here, the person who is stalking puts the victim under both physical and psychological pressure and causes intense feelings of distress, fear and helplessness (Akduman et al, 2006). Stalking includes a wide range of behaviors ranging from a romantic pattern of behavior to sexual harassment, from an innocent behavior to a brutal murder (Akduman et al, 2006; Cailleau et al, 2018). According to the National Violence Against Women Survey collected and reported by U.S. Department of Justice, 8% of women and 2% of men had been stalked at some point in their lives (Logan and Walker, 2009; Tjaden and Thoennes, 1998). Furthermore, more recent data which is obtained from the National Intimate Partner and Sexual Violence Survey from the US indicates that, approximately 15.2% of women and 5.7% of men have experienced stalking in their lifetimes (Black et al, 2011; Breiding et al, 2014). Among men, homosexuals are frequently being stalked at a higher rate (Akduman et al, 2006; Bağ, 2012).

On the other hand, some recent studies offer no significant gender differences (Thompson et al, 2012).

Interestingly, Thompson and colleagues (2012) report that males and females engage in violent stalking acts at similar rates. In some cases, including female stalker and male target, male victims' complaints are often underestimated or ignored because those men are told that being chased by a woman should be flattering (Mullen et al, 2009). Moreover, it is also suggested that female stalking might be underrepresented because women usually do not evoke much fear or anxiety as male stalkers (Cupach and Spitzberg, 2004; Sinclair and Frieze, 2001).

Purcell, Pathé, and Mullen (2001) found that, female stalkers also use similar stalking tactics as their male counterparts to intimidate their victims (Purcell et al, 2001). Even though women use similar rates of threats as men, they are less likely to threaten their victims as Meloy and Boyd claim (Meloy and Boyd, 2003).

Although stalking is a new concept, this behavior style was defined as Clerambault Syndrome (erotomanic delusion) 100 years ago (Dressing et al, 2002). With the murder of a famous actor by a stalker in the USA in the 1980s, it has started to be discussed more in the medical and legal field in the world. Although there is no accepted equivalent of "stalking" and "stalker" in Turkish yet, in this study, We will use the term "stalker", which Psych. İrem Akduman et al. used before (Akduman et al, 2006).

When compared to forensic practices, stalking is a relatively common group in the field of psychiatry, and cases are rarely reported as a result of forensic medical evaluation. The case applied to the outpatient clinic with the allegation of mobbing, and it was aimed to discuss

stalking in terms of the evaluation to be made in mobbing cases because it is a rare case in forensic medicine practices due to the characteristics of the incident.

2. CASE

The case is a 33-year-old a university graduate single woman, who applied to the Istanbul University Istanbul Medical Faculty Forensic Medicine Polyclinic with the allegation of mobbing.

The case stated that she met a male employee of the same position in another city at the company she worked as a senior manager when she was 28 years old, they talked and he offered him to be his girlfriend, and she did not accept this. That person said, "If I don't exist, you won't be able to stay here for a minute, you will be fired, I have known everywhere." and after a meeting he took his arm and said, "You have to tell me if you're with someone else." She stated that he sent e-mails to those she worked with about how bad she was, threatened and insulted her with e-mails. She stated that he started to physically wander around her workplace, around her house and waited, that the person bought a house from the same neighborhood and saw her own bedroom, and followed her by car. She stated that she could not go to meetings alone after these events, that she could not open the curtains at home, she had difficulty in going out alone, she had difficulty in looking at her e-mails, she was unable to look at her work-related mails, she had difficulty in looking at the messages when she received a message on her phone, she had difficulty in falling asleep, she was restless and anxious. She stated that she started to experience headaches and neck pain a few days a week with the effects of the events, it was understood that she had arrhythmias from time to time, that the incident came to his mind frequently after the incident, that she wanted to talk to his friends less, she was startled with a small voice and the victim brought the case to the court and the follower was punished.

In the mental state examination performed by a psychiatrist; Her mood was euthymic, her affect was tearful, there were no psychopathological findings that disrupted her evaluation of reality, she had repeated experiences in her thought content, had thoughts of helplessness and pessimism, her first psychiatric evaluation was treated with antidepression / anxiety medication (Lustral 50 mg / day) in differential diagnosis; the person is exposed to psychological violence, stalking and these behaviors and attitudes have traumatically affected mental health for a long time, being watched traumatically feels anxiety to be at all times, avoids thinking or talking about the event, has difficulty in sleeping, energy is constantly reduced. From the scales evaluating the psychological effects of traumatic experiences, she was diagnosed with "Post-Traumatic Stress Disorder" according to the classification in the Diagnostic and Statistical Manual of Mental Disorders (DSM-IV) and she received a total of 62 (intrusion: 18, avoidance: 22, excessive arousal: 22) points from the Life Events Evaluation Scale. As a result; the patient is diagnosed with Post-Traumatic Stress Disorder, which is reported to have developed after the event during the examination, with the presence of symptoms seen in traumatized people, the stalking and mental problems have been chronic, the treatment is started with the diagnosis of chronic PTSD, the treatment must be continued, It has been concluded that stalking, which affects their own areas of action, restricts the area of acting independently and creates anxiety, still continues, and in this case, the failure to ensure the safety of the case continues to negatively affect the mental health.

From the examination of the correspondence made on the internet; It was understood that there was a large number of correspondence over the last 4 years, and in these correspondence, there were no emotional correspondences in the e-mails other than the work-related correspondence of the victim. However, apart from the business correspondence of the stalker, there are a lot of long, frequent and many emotional e-mails that the stalker's feelings are not mutual, the stalker therefore contains some threatening content in the following e-mails,

which will negatively affect the work of the victim. It was understood that the correspondence he sent with the victim's sister and mutual friends also supports this.

3. DISCUSSION AND CONCLUSION

Stalking can be accepted as a relatively new concept in the literature and it is being defined as a form of violence in terms of both legal, clinical and psychological standpoints (18). Stalking is defined as repetitive actions that are experienced as unpleasant intrusive, cause anxiety, and can be understood as a reason for being afraid by an ordinary person (male or female) (19). Stalker behavior typically involves aggressive follow of the victim. The attacker can do this by standing in front of the victim's house, or he can come to private property at an unexpected moment. Stalkers distress their victims mostly by making unwanted communication (4,20). When these behaviors are considered alone, they may seem harmless, but as they are repeated, this unwanted attention may cause difficulties for the victim (21). In some cases, behaviors such as following the victim secretly without communicating, disturbing his / her business life, gossiping about, ordering a good or service on behalf of the victim and putting it on his account, making false advertisements or announcements, filing meaningless lawsuits, damaging or changing his property, threatening or attacking with violence can be observed (3,4,20). In distinguishing stalking from other types of harassment, three main characteristics should be taken into account: The behavior should be repeated at least ten times and again for at least four weeks, it should be perceived as an undesirable and violating behavior, and should cause fear and anxiety (10). In Fisher, Cullen, and Turner's (2000) study, 13% of female college victims were subjected to stalking between 1 and 6 times during 9 months, 80% of victims knew their stalkers, and 3 out of 10 women in the study had emotional problems due to stalking and they were also found to be psychologically injured (22).

In the study conducted with 82 women who were subjected to stalking in our country, the rate of the participants to know their stalkers is 57.3%. People specified by those who know the stalker; 34% of those who have met at one time in their life, 25.5% of their ex-spouse / partner, 23.4% of their friend / colleague, 8.5% of their spouse / partner or family member stalked them and of the participants stalked 25.3% appearing near their work or home, 23.6% follow-up only, 19.2% phone calls, 13.7% e-mails, 9.9% send unsolicited gifts, 5.5% have any belongings or damage to property, 2.7% were reported to be harassed by letters. 50% of the participants who have been stalked have stated that they have been stalked for less than 1 year, 42.7% for 1 - 3 years, and 7.3% for more than 3 years. It was stated that 38.6% of the participants received declaration of love, 17.5% threatened and imposed their desire to be together, 14.1% insulted, and 12.3% received unwanted messages with sexual content (22).

Dreßing et al. conducted a survey in 2003 and 2018, on a random population sample in Germany, evaluating the frequency of stalking and its psychological effects. In both surveys, (ex-)partner stalking was the main type of stalking, on the other hand the rate of people stalking by a colleague was 3.8% in 2003 and 4.2% in 2018. In 2018, there was an increase in the number of people receiving psychiatric support compared to 2003, and maybe depending on this support, the rate of individuals with psychiatric complaints was relatively lower in 2018 (23).

In the case, it was determined that the stalker was a colleague and this stalking took 4 years. It was stated that the stalker sent e-mails to the people with whom the case was working with about how bad she was, sent threats, insults and emotional e-mails to the case, began to walk around physically, wandered around the workplace, around her home and waited. It was stated that the stalker bought a house from the same neighborhood and saw the patient's bedroom. In addition, the stalker followed the case by car. It was determined that those who have been subjected to stalking stated that they shared this situation with relatives of 25%,

friends at 17.3%, spouse / partner at 9.6%, police at 14.4%, workplace management at 12.5%, applied to the school administration at %1,9 (22). It was determined that the case first reported the incident that she was subjected to to her family, then applied to the police because the stalking continued, and that the stalker was fined and suspended by court decision.

It has been determined that 87% of the stalkers are male and most of them are 35-40 years old and the average age is 36.5 (7, 24-26). Similarly, in another study, it was found that the majority of stalkers were male and their age was higher than other criminal groups (4,27). In many studies, it was stated that the majority of those who behave in this type do not work in any job during their actions (2). Compared to other types of aggressors, it has been determined that stalking offenders are more educated and have higher intelligence levels than others, most of them have committed a similar crime before and have received psychiatric treatment in the past (4,28,29). It was found that the stalker in the case started stalking at the age of 36, was a university graduate and single, and was consistent with the literature.

Stalking threatens the victim in two ways. First, the stalking behavior undermines the victim's basic sense of security and privacy. Secondly, the victim of stalking may find it difficult to establish a close relationship, because someone attacked his or her identity and / or physical integrity in order to or in response to intimacy (4,30). It was determined that 22% of the people stalked were exposed to physical violence and 23.2% to sexual harassment during the stalking period. The type of sexual harassment these people were exposed to was reported to be talking with sexual content at a rate of 39.1%, hand harassment and receiving e-mails / letters with sexual content at a rate of 26.1%, and forced sexual intercourse at a rate of 8.7% (22). In the literature, it has been shown that the stalking behavior of former partners involves more violence than the stalking behavior of foreigners (31). Studies have found that stalking cases result in violence as high as 21-46%. The case, on the other hand, stated that she was not exposed to physical and sexual abuse but forced her to be his girlfriend and received emails with emotional content. It was determined that the case was exposed to psychological violence, stalking and that these behaviors and attitudes had a traumatic effect on her mental health for a long time, being traumatically experienced was anxious to be seen at all times, avoided thinking or talking about the event, had difficulty in sleeping, her energy was constantly decreased and she felt anxious, could not leave the house because she was afraid, and moved away from people. Many victims make significant changes in their lives by having to adjust their day-today work to stalking. There can be big changes in every aspect of a person's life, such as moving away from social activities, changing phone numbers, leaving work or school, increasing security measures, moving to a new home, and changing appearance. All of these will affect the person's mental state (4,32). 75.6% of 128 people who stated that they were the victim of stalking reported a negative emotional experience. At this point, the feeling of anger comes first with 58.6%. It is followed by sleep disorders (29.7%), lack of concentration (26.7%), fear of being alone with 25%, and feelings of helplessness (24.2%) (33). Although Post Traumatic Stress Disorder is the most common, other anxiety disorders and depression are also common (4,10). In a study involving 232 women victims of cyber stalking, post-traumatic stress disorder, depression, anxiety and panic attack symptoms were found in most of the women, while another study found that alcohol use increased in 20% of the victims and sleep disorders developed in 74% (34,35). Long-term stalking is associated with more psychiatric morbidity compared to short-term (4,34). The clinician should intervene in anxiety, depression, or other mental illnesses. In particular, the possibility of suicide should be evaluated regularly (4). As a result of the verbal threats and behaviors of the aggressor's affecting mental health for a long time, the case was diagnosed as "Chronic Post Traumatic Stress Disorder". As a result of forensic medical evaluation; It was determined that the case, who applied with the allegation of mobbing, was subjected to stalking in a four-year period and that her mental health was permanently adversely affected.

The first and most important intervention that should be done to people who are subjected to stalking is to provide security (4,30). It is not always possible to stop stalking completely. This process can take a long time. However, there are basic rules to help the victim of stalking. These include avoiding contact with the stalker, making himself invisible by eliminating the situations of meeting with the stalker, documenting the stalking cases in detail, recording the names of the witnesses, announcing the stalking to the family, the immediate environment and the law enforcement in the region, changing the locks for security, lighting the house, having a mobile phone always, leaving the e-mails from the stalker unanswered (10). It is also very important to inform about current legal practices (4,36). Article 34 of the Istanbul Convention (Council of Europe Convention on Prevention and Combating Violence Against Women and Domestic Violence) recognizes stalking as a form of violence against women (1,37,38).

Although there is no legal regulation defining "stalking" directly in our country, some of the disturbing behaviors that are revealed in stalking are included in the Turkish Penal Code No. 5237 as a criminal act in separate articles. These are briefly sexual harassment (Article 105), threat (Article 106), deprivation of liberty (Article 109), disturbing the peace and tranquility of individuals (Article 123), insulting (Article 125), damaging property (151 Article), libel (Article 267) and creating crime (Article 271) (1). In the Law No. 6284 on the Protection of Family and Prevention of Violence Against Women dated 2012, it was regulated under the name of "unilateral stalking" and took its place in our legislation (39). It has been stated that one of the aims of this regulation is to protect the victims of unilateral stalking, and the victims have been given the opportunity to resort to various measures included in the law. However, a detailed discussion of this type of violence, which can lead to severe traumatic consequences, both psychologically and physically, with its legal aspect as well as its medical evaluation, will bring new perspectives on prevention to the agenda.

REFERENCES

- TÜRKOĞLU S., 2019, Türk Ceza Hukuku Açısından Israrlı Takip. Master Thesis, Galatasaray University Institute of Social Sciences Department of Public Law.
- PATHE M., MULLEN P.E., 1997, The impact of stalkers on their victims, *Br J Psychiatry*, 170 (1), 12-17.
- MESTER R., MİRGER MARGOLİN J., 2006, Stalking. *Isr J Psychiatry Relat Sci*, 43(2), 102-111.
- AKDUMAN İ., ÜNSALVER B., CAVLAK M., ORAL G., CANSUNAR F.N., 2006, Takipçi Tacizcilik, *Adli Psikiyatri Dergisi*, 3(3-4), 25-33.
- CAİLLEAU V., HARİKA-GERMANEAU G., DELBREİL A., JAAFARİ N., 2018, Stalking: From "romantic pursuit" to sexual predation, *Presse Med.*, 47(6),510-518.
- LOGAN T.K., WALKER R., 2009, Partner stalking: Psychological dominanceor "business as usual"? *Trauma, Violence, & Abuse*, 10 (3), 247-270.

- TJADEN P., THOENNES N.,1998, Stalking In America: Findings From the National Violence Against Women Survey. (No. NCJ 169592). Washington, DC: National Institute of Justice, Office of Justice Programs, U.S. Department of Justice, and the Centers for Disease Control and Prevention.
- BLACK M, BASİLE K, BREİDİNG M, et al, 2011, National intimate partner and sexual violence survey: 2010 summary report
- Breiding MJ. Simith S.G., Basile C.K., 2014, Prevalence and characteristics of sexual violence, stalking, and intimate partner violence victimization—National Intimate Partner and Sexual Violence Survey, United States, 2011. *Morbidity and mortality weekly report*. Surveillance summaries, 63(SS08),1-18.
- BAĞ B., 2012, Bir Şiddet Türü Olarak Saplantılı Takip Etme Hali, ZfWT, 4(1),165-182.
- THOMPSON CM., DENNİSON SM., STEWART A., 2012, Are female stalkers more violent than male stalkers? Understanding gender differences in stalking violence using contemporary sociocultural beliefs, *Sex Roles*, 66 (5-6), 351-365.
- MULLEN PE., PATHÉ M., PURCELL R., 2009, Stalkers and their victims (2nd ed.). Cambridge University Press.
- CUPACH WR., SPİTZBERG BH., 2004, The dark side of relationship pursuit: From attraction to obsession and stalking. Mahwah, New Jersey: Lawrence Erlbaum Associates.
- SİNCLAİR HC., FRİEZE IH., 2001, Initial courtship behavior and stalking: How should we draw the line. In Davis, K. E., Frieze, I. H., Maiuro, R. D. (Eds.), Stalking: Perspectives on victims and perpetrators, 186-211. New York, NY: Springer Publishing Company.
- PURCELL R., PATHÉ M., MULLEN P. E., 2001, A study of women who stalk, *American Journal of Psychiatry*, 158, 2056–2060.
- MELOY JR., BOYD C.,2003, Female stalkers and their victims. *Journal of the American Academy of Psychiatry and Law*, 31, 211–219.
- DRESSİNG H., HENN. FA. AND GASS P., 2002, Stalking behaviour an overview of the problem and a case report of male-to-male stalking during delusional disorder. *Psychopathology*, 35(5), 313–318.
- BAŞAR D., 2019, Stalking as a new form of violence: Its relationship with ambivalent sexism, Honor endorsement and gender-based violence attitudes, Master Thesis, The graduate School Of Social Sciences Of Middle East Technical University.
- PRABHU M., DEBRA A. PİNALS D.A., BAHEKAR P., 2019, Document on stalking, Intrusive Behaviors and Related Phenomena by patient APA Resource Document Approved by the Joint Reference Committee, https://www.psychiatry.org/psychiatrists/search-directories-databases/library-and-archive/resource-documents.
- KAMPHUİS JH, EMMELKAMP PMG., 2000, Stalking a contemporary challenge for forensic and clinical psychiatry. *Br J Psychiatry*; 176(3), 206-209.
- PURCELL R, PATHE M, MULLEN PE., 2004, Stalking: Defining and prosecuting a new category of offending. *Int J of Law and Psychiatry*. 27(2), 157-169.
- GÜRGEZOĞLU E., 2010, Takip/İzlemeye İlişkin Algının İncelenmesi Ve Mağdur Olan/Olmayanların Kaygı Düzeylerinin karşılaştırılması, Master Thesis, Maltepe University, Institute of Social Sciences, Department of Psychology.

- DREBİNG H, GASS P, SCHULTZ K, KUEHNER C., 2020, The Prevalence and Effects of Stalking, *Dtsch Arztebl Int*, 117(20), 347–353.
- MOHANDİE K., MELOY R., MCGOWAN M.G., İLLİAMS J., 2006, The RECON Typology of Stalking: Reliability and Validity Based Upon a Large Sample of North American Stalkers, *J Forensic Sci*, 51(1) 147-155.
- Wondrak Isabel (2004):Auswirkungen von Stalking aus Sicht der Betroffenen". In: Bettermann, Julia/ Feenders, Moetje (Hg.): Stalking Möglichkeiten und Grenzen der Intervention. Frankfurt/Main: Verlag für Polizeiwissenschaft. 21-35.
- James D.V., Farnham F.R., 2003, Stalking and Serious Violence. *J Am Acad Psychiatry Law*. 31,432-439.
- HALL D.M. The Victims of Stalking. In Meloy JR, editör, 1998, The Psychology of Stalking: Clinical and Forensic Perspectives. London: Academic Press, Elsevier.
- HARMON R.B., ROSNER R., OWENS H., 1995, Obsessional Harrassment and Erotomania in a Criminal Court Population, *J Forensic Sci*, 40 (2),188-196.
- MELOY JR. The Psychology of stalking. In Meloy JR, editör, 1998, The Psychology of Stalking: Clinical and Forensic Perspectives. London: Academic Press, Elsevier.
- MULLEN PE., PATHE M, PURCELL R.,2002, Stalkers and their Victims. Cambridge: Cambridge University Press.
- SHERİDAN L, ROBERTS K., 2011, Key questions to consider in stalking cases, *Behavioral Sciences and Law*, 29(2), 255-270.
- PATHE M, MULLEN PE, PURCELL R, 1999, Stalking: false claims of victimisation. *Br J Psychiatry*, 174 (8),170-172.
- KERCHER G., JOHNSON M., 2006, Stalking In Texas. Crime Victim's Intitute.
- WESTRUP D., FREMOUW W.J., THOMPSON R.N., LEWİS, S.F., 1999, The Psychological Impact of Stalking in Female Undergraduates. *Journal of Forensic Sciences*, 44(3), 554-557.
- MULLEN PE., PATHE M., PURCELL R., STUART GW.,1999, Study of Stalkers. *The American Journal of Psychiatry*, 156(8), 1244-1249.
- ABRAMS KM, ROBİNSON GE., 1998, Stalking. Part II: Victims problems with the legal system and therapeutic considerations, *Can J Psychiatry*, 43 (5), 477-481.
- Van Der Aa S., 2012, Stalking as a Form of (Domestic) Violence Against Women, *Rassegna Italiana di Criminologia*, 3, 174-187.
- Kadına Yönelik Şiddet ve Aile İçi Şiddetin Önlenmesi ve Bunlarla Mücadeleye Dair Avrupa Konseyi Sözleşmesi (İstanbul Sözleşmesi), Resmi Gazete 08.03.2012/28227, https://pure.uvt.nl/ws/portalfiles/portal/1446939/Stalking_as_a_form_of_domestic_vio_lence.pdf, For the Turkish translation see: https://rm.coe.int/1680462545, (Erişim Tarihi:17.03.2020), https://www.resmigazete.gov.tr/eskiler/2012/03/20120308M1-1.htm.
- <u>Ailenin Korunması ve Kadına Karşı Şiddetin Önlenmesine Dair Kanun</u> 6284, Resmi Gazete 20.03.2012/28239, https://www.resmigazete.gov.tr/eskiler/2012/03/20120320.htm.

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