**Coercion in the Digital Sphere: Sextortion and the Need for Comprehensive Cross-Border Cybercrime Legislation**

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**Abstract**

Sextortion, a rapidly evolving cybercrime that involves the exploitation of victims through threats of disseminating explicit material, presents significant challenges for legal systems worldwide. This paper aims to examine the underlying issues of defining, recognising and legislating sextortion through a comparative law and policy approach. It is focused on two of the most prominent systems of common law traditions - the United States and the United Kingdom. Despite their advanced legal frameworks, policy-makers in both jurisdictions and international organs of justice have failed to provide a proper solution that would meet the victims of the cybercrime with legal certainty, consistency and continuity. While the situation is far from ideal, the proposed Michigan House Bill, also known as Jordan D's Law, provides a realistic step toward codifying and addressing sextortion comprehensively.

Keywords: *sextortion*, *cybercrime*, *exploitation*, *Jordan D's Law*, *The King v. McCartney [2024]*, *international justice*

1. Introduction

With each major technological advancement, concerns about cybersecurity and cybercrime weigh more heavily on daily life. Both citizens and policy-makers of modern societies continuously strive to grasp applicable ways to redefine privacy and protection methods. The difficulty of that task shall not at any point be overlooked considering that as soon as a recent problem gets solved and regulated a new variant of that same problem takes shape, leading policy-makers into a never-ending loop. The expansion of human life from the analogue into both the analogue and digital spheres made it inevitable for the said new variants of crime to emerge and take on roles once held exclusively by analogue criminal experiences. A prime example of such a variant is ‘sextortion’. Issues related to the recognition and regulation of 'sextortion' in modern legal systems arise as soon as the need to define it emerges. This paper is intended to examine the different issues legislators and legal professionals face when tackling sextortion cases, given through examples of different practices in two of the most influential common law traditions — the United States of America and the United Kingdom.

*1.1 Differentiation of sextortion from other cyber sex-crimes*

Having the fundamental human right to privacy recognised and enforced is an essential pillar of a peaceful and dignified life. The ability to autonomously make decisions about one’s own body, sexual engagements and interactions is a vital component of this extra-patrimonial right; therefore, the development of an understanding of sexual freedoms and limitations on the internet was deemed necessary from the very start. The legal viewpoint on this matter aims to define different kinds of sexual crime and violence in order for policies and regulations to be specific enough to be enforceable.

While there is no one clear definition of sextortion, the term refers to scenarios where offenders threaten to reveal sexual images to blackmail victims into providing more pictures, participating in sexual acts, or complying with other demands. It is a phenomenon practised exclusively online and it is a great concern for cybersecurity and the safety of people. As emphasised by Wolak, Finkelhor, Walsh and Treitman[[1]](#footnote-0), the difference between similar digital sexual privacy-invading acts (sexting, non-consensual pornography, revenge pornography) and sextortion is that sextortion must involve the element of an explicit threat. In sextortion cases, perpetrators not only obtain sexually explicit content of the victims — either through hacking, catfishing, or other forms of deception — but also threaten to release this content publicly or send it to the victim’s family, friends, or colleagues, unless their demands are met. These threats can take various forms, such as the immediate risk of exposure or the use of escalating threats over time, creating psychological coercion. The demands are either sexual (e.g., requesting more photos, videos, or even in-person sexual favours) or financial in nature.

While the ‘common sense’ principle of ignoring such situations and hoping they would go away might suffice in some cases, specific groups and communities suffer great damages from the lack of regulation of these situations and are disproportionately targeted due to their vulnerability. This digital form of sexual exploitation at times leads to a form of slavery which is, again, more likely to happen to members of underprivileged communities of the society and the two predominant types of slavery are sexual and financial (financial entails both due to the nature of the phenomenon).

It is important to note that the word ‘sextortion’ is not used in a sense that is laid out in some earlier works of the United Nations – for example, the International Association of Women Judges defined sextortion as the abuse of power to obtain a sexual benefit or advantage in a 2012 toolkit[[2]](#footnote-1). The sextortion referred to in this paper is the aforementioned cybercrime (threat of disseminating pornographic content) and should not be mixed up with the sextortion used in IAWJ’s toolkit (abusing power for sexual favours).

2. The issue of defining sextortion

The root of the problem of defining and regulating sextortion is its international nature. Acts committed online, utilising a globalised network that the internet is, inherently include cross-border cases. Many sextortion cases remain unresolved because the perpetrator and the victim are not in the same country, and applicable laws differ (if any are in place). Most systems do not recognise sextortion in their legislation and rely on criminal and other cyber legislation or precedent when resolving such cases while some do not even recognise sextortion as a term. The word is usually used colloquially to further describe a case in everyday speech, jurisprudence, obiter dicta, etc.   
 The way that systems treat sextortion (if they do) is often in conflict with jurisprudence as they usually see extortion as a child exploitation matter rather than violence against people from all walks of life. A good example of this is Benjamin Wittes’s critique of the U.S. Justice Department’s approach[[3]](#footnote-2), arguing it is primarily an issue of violence against women. At the time of the work of Mr. Wittes on the matter, that statement could make logical -sense yet with the development of sextortion cases, it has been established that the target group are teenage boys. A similar approach to one of the US institutions is the one of the European Union Agency for Law Enforcement Cooperation (EUROPOL) which argues that while sextortion can be financial and sexual it only regards children. Furthermore, EUROPOL even goes so far as to recommend the term ‘sextortion’ be changed for ‘online sexual coercion and extortion of children’[[4]](#footnote-3). The situation in the United Kingdom is diametrically opposite to the one in the EU – it concerns people of all ages yet it only narrows the term down to ‘Financially Motivated Sexual Extortion’. Due to the overarching differences in the definition of the act and the difference in the legislation (usually a lack thereof), resolving a sextortion case committed by someone in North Macedonia to someone in Paraguay is virtually impossible yet the case remains very real and likely represents an agony to the sextorted party.

3. Sextortion across jurisdictions

Comprehending the complexities, similarities and differences in treating sextortion cases would be more plausible in the case of a deeper comparison of legal systems being made. Therefore, examining the mechanisms of the US legal system with those of the United Kingdom shall suffice in answering the question of differences in treatment internationally. To clarify, the different jurisdictions within the UK will be considered collectively in this context because of the substantial similarities and overlaps among them, the cross-border nature of sexual extortion, and the current global scarcity of relevant legislation. This approach will allow for a more cohesive analysis while addressing the shared legal principles and frameworks present in these jurisdictions. The comparative analysis is conducted to shed light on the differences – good practices and inefficient ones. Due to the nature of the matter, international policy-making and cooperation on all levels can be deemed inevitable from the very start and, per that, this analysis should also outline possible framework for international policies.

*3.1 Executive’s report on sextortion in the United Kingdom*

In a report from 29 April 2024, The National Crime Agency of the United Kingdom (NCA)[[5]](#footnote-4) has issued an urgent warning about a sharp increase in sextortion cases, once again defining sextortion as individuals being blackmailed and threatened with sexual images to meet certain demands for money, limiting sextortion to sexual extortion for financial gain. Consistency in the definition continued as the report stated that both men and women of all ages were targeted. Victims were urged not to pay or engage further with the scammers but to report the crime and seek support and the importance of maintaining privacy settings on social media and being cautious when interacting online was reiterated. As the warning was issued to educational professionals, it is clear that the United Kingdom government has realised the importance of spreading awareness on the matter. The report stipulated both that the number of reported cases increased by approximately 149% from 2022 to 2023 and that 91% of the victims were males aged 14 to 18. British authorities also expressed consciousness of the fact that these cases transcend borders – the report stated that such crimes are often perpetrated by groups from West Africa and Southeast Asia).   
 Through a single report, the UK has expressed alertness, recognition of internationalism of the issue, guidelines for citizens, and understanding of the vulnerable group and the broader scope of people affected on the one hand. By issuing the warning to educational professionals, the Kingdom opened the door to the idea of educational clauses in prospective attempts at enacting legislation. On the other hand, it remained silent on how cooperation with West African and Southeast Asian countries would be of help in resolving cross-border cases and how not all cases of sextortion are financially motivated. As it is a warning, it cannot be expected of it to include information about how the country is working to resolve the issue, yet the said warning is basically the only form of communication between organs of the government and the people on this matter.

*3.2 Executive’s report on sextortion in the United States*

In a warning issued by the FBI Sacramento Press Office on 17 January 2024[[6]](#footnote-5), parents, caregivers and education workers were warned about sextortion as ‘a growing threat preying upon the nation’s teens’. The reports are, indeed, similar and have almost the same approach – both reports lead to the same conclusion: sextortion disproportionately affects young people, specifically young men aged 14 to 17. It has been reported that 20 suicides were committed by sextortion victims between October 2021 and March 2023 which led Democrats in Michigan to propose some of the most important US sextortion legislation which is a remarkable improvement in recognition of different types of cybercrimes. While financial sexual extortion is considered the most prevalent type, this report and most U.S. reports and legislation do not limit sextortion to purely financial exploitation, as is the case in the UK. The awareness of different types of sextortion in the States is also clear due to the fact that the FBI offers access to different resources for financial and non-financial sextortion. A similar pattern to the one seen in the United Kingdom was established in the States when it came to the areas of the world from which perpetrators usually operate – West Africa and Southeast Asia lead in organised crime groups committing privacy-invading cyber crimes. Finally, an important problem (that the proposed legislation in the State of Michigan is currently trying to target) is the age of the victims. Even though progress is being made and sextortion is a directly recognised cybercrime, in order for the said cybercrime to be considered sextortion, the victim generally needs to be a minor. All resources address the sextortion of minors but tend to ignore the possibility of persons over the age of majority experiencing the same thing.

*3.3 Legislative and practical approach in the UK*

A UK-based Non-Governmental Organisation, SafeGuarding Hub, in its attempt to support this cybercrime as a topic of conversation within the nation’s civil society also pointed out the legal mechanisms lawyers use when trying to tackle cases of sextortion. This paragraph heavily relies on their analysis[[7]](#footnote-6) of the current legal landscape and the Acts mentioned on their website. Section 21 of The Theft Act 1968 covers the issue of blackmail with the intent of financial gain or causing loss. As defined by the executive of the United Kingdom, sextortion is seen as blackmail for financial gain and therefore this can be applicable, yet in case of demands being of non-financial nature, such as providing the perpetrator with more sexual services, The Theft Act is of no use. The Protection from Harassment Act of 1997 only includes sextortion cases if they include persistent, intimidating and harassing behaviour, which basically insists on the constant feature of the situation. Section 127 of The Communications Act 2003 states that ‘a person may be guilty of an offence by persistently making use of a public communications network for the purpose of causing annoyance, inconvenience or needless anxiety to another person’.   
 This is especially relevant in addressing the technological aspect of sextortion as cooperation with social media companies tends to be the only way to gather enough evidence to prove such a crime. A good example of what happens when there is a lack of cooperation is the arrest of Pavel Durov in Paris in August 2024[[8]](#footnote-7). He was accused of his platform allowing for the distribution of child sexual abuse images. Durov’s platform is one of the predominant platforms used for all types of cybercrime, including sextortion.   
 The Computer Misuse Act of 1990 covers unauthorised computer access, including images obtained by hacking. It can be used if sextortion images are acquired through unauthorised computer access or hacking which is often the case. Sexual Offences Act 2003 is applicable when the sextortion victim is a child, as the act includes several child protection provisions. This is one of the more usually argued acts considering that the majority of sextortion cases concern minors, teenage boys specifically, as mentioned earlier. Protection of Children Act 1978 completely criminalises possession of any sexually explicit images of children which is relevant, again, for the majority of UK sextortion cases due to the targeted demographic.  
A cross-border sextortion case governed by courts in Northern Ireland showcased the excessive amount of legislation that has to be applied to such cybercrimes. As this one includes children, it is a good example of the application of the previously mentioned Sexual Offences Act 2003.   
 *The King v. Alexander McCartney [2024]* is a case of a man in his mid-20’s who had conducted various atrocious acts extorting young girls worldwide for sexual favours. His victims were from Northern Ireland, the rest of the UK, the Republic of Ireland, continental Europe, New Zealand, Australia and the United States. He strategically abused underage girls experimenting with homosexuality to further secure himself throughout the execution of crimes because they would not only have to report that they were being sexually exploited but also that they might be gay. He would send them a photograph of a girl as if it were a picture of himself and then encourage them to send him compromising images back. During the initial phases of the trial, this case was treated as a catfishing case, which is another type of cybercrime. The importance of clear-cut differentiation between cybercrimes in legislation can be reemphasised by this example as a lack thereof may lead to confusion and delay of justice. Later on, the case was classified as a sextortion case yet it involved no monetary extortion which is a point to raise when discussing the definition provided by the executive in the United Kingdom.  
 The victims would send their explicit images and receive back a template message stating that they had been catfished and that they would have to do as he said. He threatened to upload the images to the internet or send them to the victim's contacts. At times, he would send information about the victim’s whereabouts to intimidate them further, showing that he knew where they lived and went to school. The demands would be of sexual nature, including self-penetration, inclusion of younger siblings and animals in the acts, and showing one’s face in the process. It is stated that ‘the chat conversations recovered from the defendant's devices make for the most disturbing reading for any normal person, though more so for any parent.’ In this array of crimes, he committed manslaughter, when his conduct caused 12-year-old C.T. in West Virginia to commit suicide by shooting herself in the head with her father's gun, as reported by Homeland Security of the United States.   
 This, above all disturbing and excruciating, series of events was judged on in Northern Ireland using a variety of precedents and legislation, and within obiter dicta of the case, the judge cherished the work of international law enforcement. Most notably, other than the Sexual Offences Act 2003 which enabled the imposition of a Sexual Offences Prevention Order (SOPO) to further restrict McCartney’s actions, the case relied on the Offences Against the Person Act of 1861 for the manslaughter charges which granted him the maximum imprisonment sentence. A collection of Northern Irish laws was also employed, including the Sexual Offences Order 2008 for causing children to engage in sexual activity and sexual communication with children. The Protection of Children Act 1978 was utilised due to the defendant’s making, possessing and distributing indecent images of children. Common law principles for determining blackmail were also used. With the prosecution's and the State's marvellous work, McCartney was convicted to a life sentence in prison with a 20-year tariff.

*3.4 Evaluation of the UK’s practical approach to sextortion*

It is crucial to note that treating the same crime by using multiple different sources of the law and multiple different acts above all leads to inconsistency and an overall lack of legal certainty and trust in the system. Sextortion cases are sometimes treated with an up to 2 years imprisonment sentence and sometimes with up to 14 years imprisonment (under The Theft Act 1968, Section 21). The fact that both non-governmental and governmental organisations have brought up concerns is an indication of a necessity for legislating sextortion. It is certain that there is a need for a codified statutory law that clearly defines sextortion (gives it proper status and recognition as a cybercrime of its own sort), differentiates between sextortion and other sexual-exploitation cybercrimes, facilitates the exact way in which cooperation with social media companies should be conducted in order to prevent and resolve sextortion cases, includes a clear, rigorous and above all consistent penalty system for this crime in the UK. Had it been for a nationwide clearly defined and differentiated Act that determined what sextortion is and what is another type of cybercrime, the case of The King v. McCartney would likely have experienced a lower amount of set-backs. The statutory law should also take into account the overarching international component of treating sextortion cases.

*3.5 The current practical approach to sextortion across the US*

In the United States, the federal law that applies is a complex patchwork and can only do so much as a lot of competencies for passing legislation derived from the US Constitution belong to the states specifically.   
 Individual states mostly haven’t regulated sextortion and the precedent applied differs. The aforementioned *Georgetown Journal of International Law (number 48; 2016-17)* states that when sextortion victims are children, there are child exploitation and child pornography statutes that aid in facilitating the trial but that the true problem arises when the victim is not a minor. The regular interstate extortion statute is used in other cases and it grants a two-year maximum sentence. The article also mentioned that interstate stalking statutes are oftentimes used but they do not target the issue itself even though they can be effective. It’s of grave importance to recognise that sextortion is primarily a cybercrime and should be treated as such. A lot of the time, sextortion involves non-consensual unauthorised access to the victim’s device or accounts with the goal of obtaining compromising images or videos, which is when The Computer Fraud and Abuse Act (CFAA) can be applied.

*3.6 Movement towards legislating sextortion in the US* As previously mentioned, due to the decentralised federal administrative system of the US the majority of law-making competencies are up to the individual federal states (in accordance with Article 8 of the US Constitution). In the statistics section of the paper, it was established that suicides have taken place, especially among young men, due to sextortion crimes. One of these suicide cases attracted significant levels of attention from the Democratic party representatives in the State of Michigan who have decided to take action and propose codified and clear-cut legislation on the topic.

4. Jordan D’s Law as a potential future of regulating sextortion cases

At the end of June 2024, they introduced the Michigan House Bill 5887 (HB-5887), also known as ‘Jordan D’s Law,’ named after Jordan Demay, a 17-year-old from Marquette who took his own life amidst being targeted by a Nigeria-based global sextortion ring[[9]](#footnote-8).  
 HB-5887 sticks out as the first US bill to state that ‘an individual who intentionally and maliciously threatens to release, exhibit, or distribute sexually explicit visual material of another individual in order to compel or attempt to compel another individual to do any act or refrain from doing any act against the individual's will with the intent to obtain additional sexually explicit visual material or anything else of value is guilty of a felony’. This falls out of the realm of the regular US sextortion definition that solely focuses on the cybercrime as a child exploitation and abuse issue by including everyone who may fall victim to it. Regardless, it tackles sextortion in the most direct manner by outlawing the content of its definition. It is the first piece of US (and broader) legislation that has a hands-on approach and that defines the exact method of assigning penalties to perpetrators once caught and deemed guilty. For a first offence, the penalty is up to 5 years in prison, escalating to 10 years for a second offence, and up to 20 years for additional offences. If the victim is a minor or vulnerable adult, or if the coercion leads to serious injury or death, the penalty can reach 20 years, even for a first offence. Offenders under 18 face a misdemeanour charge, with a maximum penalty of 1 year and possible counselling. This Partisan Bill was proposed in June and at the time of writing has the status of an *introduced* law and is yet to be decided on.   
 A codified document such as this one ensures legal certainty and continuity and is exactly what victims of cybercrime need. Even though it is just a start and doesn’t resolve all the issues that exist it can most certainly be considered a step in the right direction towards a feasible and sensical approach to preventing and resolving sextortion cases. If Jordan D’s Law is passed, it could serve as an example of good practice in regulating sextortion and other cybercrimes. Addressing one issue effectively could prompt lawmakers to prioritise protecting individuals’ privacy in an increasingly digital world.

5. Conclusion

It is vital to bear in mind that the law alone cannot resolve challenges such as this one. Policy-making, as the process of enacting deliberate principles, rules and guidelines, should adopt a multifaceted approach to addressing issues while adapting to an ever-changing societal landscape. Even though the most important pillar of solving cybercrime is having up-to-date laws, the rise of technology has showcased a different problem humankind is experiencing - a lack of communication and cooperation. Sextortion, an inherently international problem, is not only not regulated locally but does not even have international law from which local policies can be derived. There are almost no guidelines by international organisations for prevention and coping with the very real experience endured by thousands each year. There is no clear set-in-stone definition of sextortion. Virtually, sextortion is an undeniable cybercrime that stays invisible in the eyes of the international community.  
 The lack of unified worldwide norms presents major obstacles for groups like EUROPOL and INTERPOL, which have defined sextortion in their own ways and are actively striving to eradicate it. The policing institutions in question have made progress in sharing intelligence and enforcing the law, but the larger-scale battle against sextortion is impeded by the absence of a single international policy. International agencies and institutions, notably including the United Nations, in contrast to INTERPOL and EUROPOL, have yet to offer specific guidelines and recommendations on how governments ought to operate and once they do, it would be invaluable if they took into account both intergovernmental cooperation (making similar and complementary laws in regards to the issue and sharing intelligence on international sextortion chains) and cooperation with social media companies (such as Snapchat, Facebook, Telegram, and various dating applications, where the majority of sextortion cases take place).  
 Cybercrime and emerging technologies represent an opportunity for the international community and policy-making institutions to take a firm, united stance by sending a cohesive global response. It is a chance for legislation and its enforcement to match worldwide and for technological misuse to be reduced to a minimum.

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