

CYBER-EXTORTION: DUTIES AND LIABILITIES RELATED TO THE ELEPHANT IN THE SERVER ROOM

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I. INTRODUCTION

Cyber-extortion—demanding money or something else of value in exchange for not carrying out threats to commit harm that would involve the victim's information systems—is an evolving and costly form of criminal activity.² The title of this article reflects the fact that cyber-extortion, like the proverbial elephant in the room, is a large problem which has not been thoroughly discussed. This article fills a conspicuous void in existing scholarly and practitioners' literature by comprehensively analyzing the legal frameworks that apply to cyber-extortion and by discussing relevant public policy concerns.

The only publicly available survey that has addressed cyber-extortion to date, a 2004 Carnegie Mellon University (CMU) survey of 100 companies, found that 17% of small and midsize businesses had been the target of some form of cyber-extortion.³ A further 13% of respondents were unsure if their company had been targeted.⁴ A common tactic in cyber-extortion scenarios is

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2. Gregory M. Rednarski, *Escalating and Reducing the Threat of Transnational Cyber Extortion against Small and Medium Size Organizations*, INFORMATIONWEEK, Sept. 2004, at 21, http://www.infinite800p.com/library/InformationWeek-CMU_Cyber_Extortion_Study.pdf.

3. *Id.* at 13 (file), 23.

4. *Id.* The 2005 annual CSIS/BI Computer Crime and Security Survey did not separately measure cyber-extortion incidents, but listed as the second through eighth most-frequently occurring computer crimes.

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