

SNOHOMISH COUNTY PROSECUTOR'S OFFICE INVESTIGATIVE CHECKLIST

CONTROLLED SUBSTANCES HOMICIDE

RCW 69.50.415

ELEMENTS

1. The suspect knowingly and unlawfully delivered a controlled substance (from Schedule I, II, III or flunitrazepam, including its salts, isomers, and salts of isomers) to the victim; AND
2. The victim subsequently used it; AND
3. The use of the controlled substance caused the victim's death.

SPECIFIC REQUIREMENTS

- [] 1. Determine and detail the evidence to prove/disprove that suspect did the delivery.
- [] 2. If any of the substance in question has been seized, obtain crime laboratory analysis to confirm whether it is a controlled substance.
- [] 3. Determine and detail the evidence to prove/disprove that the victim used the substance delivered by the suspect.
- [] 4. Determine and detail the evidence to prove/disprove that the suspect's conduct was a proximate cause of the victim's death, i.e., a cause which, in direct sequence, unbroken by any new independent cause, produced the death, and without which the death would not have happened.
- [] 5. If the suspect is an accomplice, determine and detail what evidence exists to prove/disprove that the suspect knew his/her aid would facilitate the crime.
- [] 6. Determine and detail what evidence exists to prove/disprove the prior relationship between the suspect and victim.
- [] 7. Determine and detail what evidence exists to disprove/prove the suspect's alibi -- and specifically interview possible alibi witnesses.
- [] 8. Determine and detail what evidence exists to disprove/prove suspect's planned activities that day.
- [] 9. Determine and detail what evidence exists to disprove/prove victim's planned activities that day.
- [] 10. Determine and detail what evidence exists to prove/disprove suspect's use of drugs/alcohol.

- [] 11. Determine and detail what evidence exists to prove/disprove victim's use of drugs/alcohol.
- [] 12. Consider the need for forensic laboratory examination and testing, including DNA testing, fingerprint comparison, forensic entomology, forensic anthropology, etc.
- [] 13. In addition to the usual photographs (with a detailed photo log), consider videotaping the scene, aerial photography, etc.
- [] 14. Prepare detailed diagrams of the crime scene, with accurate measurements -- consider "total station" diagrams, etc.
- [] 15. Obtain autopsy report, including toxicology report.
- [] 16. If victim was medically treated before death, victim's medical reports and statements from all medical personnel treating victim regarding cause of injuries, nature and extent of injuries, and medications used.