

- 1 or leads are developed at this time.
- 2 2 August, 1976 - Evidence received. The evidence located
3 during the investigation of the Blake
4 homicide is transferred to the Washington
5 State Crime Lab in Seattle.
- 6 5 August, 1976 - Detective John Howard recontacts [REDACTED]
7 [REDACTED] and at this time becomes
8 aware of a severe vision problem and
9 further becomes aware that during the
10 line-up conducted on 10 October, 1974,
11 did not have her glasses with her at that
12 time.
- 13 6 August, 1976 - Attempts are made to gain the military
14 records of Warren L. Forrest.
- 15 27 August, 1976 - An additional progress report is received
16 by Judge Skimas from Western State's Mental
17 Hospital regarding Warren L. Forrest.
- 18 September, 1976 - Detective Davidson continues attempts of
19 the identification of the unknown female
20 victim from Dole Valley and further
21 continues the investigation into the
22 Valenzula homicide. If not previously
23 added, 28 July, 1976, search dogs are
24 utilized in several additional areas of
25 Clark County including several Clark
26 County Parks and Recreation Department
27 property for additional human remains.
28 None are located.
- 29 8 September, 1976 - Advised by the Department of the
30 Military that military records for
31 Warren L. Forrest would not be
32 made available to us.
- October, 1976 - Nationwide broadcast is made regarding
the unidentified female victim from the
Dole Valley area.
- December, 1976 - Detective Songer is continuing the
investigation of the Barbara Ann
Derry homicide recontacting some
selected suspects. No additional
new leads are developed at this time.
- 21 December, 1976 - Detective Davidson recontacts [REDACTED]
[REDACTED] and allows her to
observe a photographic laydown which
includes photograph of suspect,
Warren L. Forrest. [REDACTED]
[REDACTED] at this time, identifies
Warren Forrest as the person who
abducted her and assaulted her on
17 July, 1974.
- December, 1976 - Detective Davidson continues Case
#250, Valenzula and unidentified
victim. Renews attempts at identify-
ing the unidentified victim.

- 1 17 March, 1977 - Progress report received from Western
2 State's Hospital regarding Warren
Forrest by the court.
- 3 19 May, 1977 - Correspondence received from the
4 Washington State Crime Lab regarding
5 the evidence in the Krista Blake
6 case. The report indicating a need
for suspect hair samples prior to
completion of the evidence analysis.
- 7 August of 1977 - Detective Davidson intensifies efforts
8 at identifying the unidentified female
9 victim at Dole Valley by contacting
10 Dr. Snow of the Aeromedical Institute,
11 FAA Oklahoma for a facial reconstruction
and further enters information regarding
this victim in the international publica-
tions for missing persons. His efforts
provide no new information or additional
leads.
- 12 August through
13 December, 1977 - Detective Davidson begins to compare
14 all of the facts involved in the afore-
15 mentioned cases. He further begins
to rough chart the MO similarities in
these cases in an attempt to organize
subsequent investigation.
- 16 10 January, 1978 - A state's psychiatric expert is
17 appointed to evaluate Warren L.
Forrest.
- 18 10 January, 1978 - A discovery order is granted by the
19 court for information prior to the
20 release of Warren L. Forrest from
Western State's Hospital.
- 21 26 January, 1978 - Final report is received from Western
22 State's Hospital regarding Warren L.
Forrest with the recommendation for his
release.
- 23 20 January, 1978 - Partial records received by the Prosecuting
24 Attorney's Office from Western State's
Hospital in response to the discovery
order.
- 25 17 March, 1978 - Warren L. Forrest is examined and evaluated
26 by Dr. Edward M. Scott of Portland, the
state's psychiatric expert.
- 27 24 March, 1978 - A conference is held between the Prosecuting
28 Attorney's Office and Clark County Sheriff's
29 Office investigators and it is determined
30 that an intensified investigative effort
should take place concentrating on the afore-
mentioned missing persons and homicide cases
31 in anticipation of a release hearing by
Warren L. Forrest. Detective Maas and
32 Detective Zorn are assigned to investigate

- 1 and organize these prior cases on a fulltime
basis.
- 2 21 March, 1978 - Warren L. Forrest and his attorney, sign
3 a waiver of confidentiality for the release
4 of mental health records.
- 5 24 March, 1978 - Detective Zorn and Detective Maas begin
6 case organization which involves compiling
7 and centralizing all prior reports and
8 compiling 3 x 5 card case files thus putting
9 a massive amount of reports in a useable
10 form for any subsequent investigation or
11 prosecution.
- 12 28 March through
13 30 March, 1978 - A case synopsis is compiled which summarizes
14 the total investigative efforts and case
15 similarities to date.
- 16 30 and 31 March,
17 1978 - Planning conferences conducted with members
18 of the Clark County Sheriff's Office,
19 Clark County Prosecuting Attorney's Office
20 and Pierce County Sheriff's Office to
21 formulate a definitive plan for the subse-
22 quent investigation and prosecution.
- 23 31 March, 1978 - Comparisons between our cases and two unsolved
24 Pierce County homicides are studied.
- 25 3 April, 1978 - All evidence involved in the aforementioned
26 homicide cases is compiled from different
27 locations in the Sheriff's Office evidence
28 system and placed in a centralized location
29 in a safe in the Clark County Sheriff's Office.
- 30 April, 1978 - Additional materials are mailed to
31 Dr. Edward M. Scott to provide him with
32 more information on victim, case and
suspect background.
- April, 1978 - An associate list of Warren L. Forrest
is begun.
- April, 1978 - Intensified background profile of Warren L.
Forrest is initiated.
- 3 April, 1978 - Clark County personnel records pertaining
to Warren L. Forrest are received.
- 5 April, 1978 - Additional evidence is compiled which includes
centralization of all photographs that had
been taken during prior investigations.
- 5 April, 1978 - Additional public records pertaining to
through 10 April, Warren L. Forrest are researched.
1978
- 5 April, 1978 - Forensic dentist is contacted in an
additional effort to identify the
Dole Valley unidentified victim.

- 1 11 April, 1978 - Additional evidence items which had not
2 been submitted to the Washington State
3 Crime Lab are transferred to that
4 location for additional laboratory
5 analysis.
- 6 April, 1978 - A calendar of Warren L. Forrest's back-
7 ground is initiated in conjunction with
8 the background investigation.
- 9 17 April, 1978 - Detective Zorn initiates recontacts
10 through 23 June, with all witnesses involved in the
11 1978 ██████████ and Blake investiga-
12 tions and also in the Grissom missing
13 person case.
- 14 22 April, 1978 - An additional search of Dole Valley
15 and Tukes Mountain utilizing search
16 dogs from the Northwest German Shephard
17 Search Dog Association. Approximately
18 ten sets of additional bones are located
19 at this time.
- 20 27 April, 1978 - The bones located during this search are
21 transferred to the Clark County Coroner.
- 22 28 April, 1978 - Additional evidence in the form of photo-
23 graphs are transferred to the Washington
24 State Crime Lab.
- 25 25 April, 1978 - Conference is conducted with investigators
26 from the Multnomah County Sheriff's Office
27 for purposes of comparing several unsolved,
28 similar homicide cases.
- 29 May of 1978 - Background investigation continues,
30 witness recontacts continue and
31 additional public records pertaining
32 to Warren L. Forrest are researched.
- 33 9 May, 1978 - Bones of an unidentified human person
34 are located in the area of Lackamas
35 Lake. Detective Paul Brown and Detective
36 Dush of the Clark County Sheriff's Office
37 are assigned to the initial investigation
38 of an apparent homicide.
- 39 16 May, 1978 - These remains are identified of those
40 of Gloria Nadine Knutson.
- 41 May of 1978 - Detective Maas assists Detective Dush
42 with the continuing investigation into
43 the homicide of Gloria Nadine Knutsen.
- 44 16 May, 1978 - Detective Dush is assigned to the continuing
45 through 13 July, investigation into this homicide case and
46 1978 to date has completed major associate
47 contacts.
- 48 2 June, 1978 - Case information packages are compiled
49 and contact initiated with Dr. David
50 Kessler and Dr. Seymour Pollock of

- 1 California.
- 2 9 June, 1978 - Contact is initiated with the FBI
3 Behavioral Science Unit in Washington
D.C. for additional assistance.
- 4 8 June, 1978 - Dr. Edward Scott interviews the wife
5 and parents of Warren L. Forrest
- 6 14 June, 1978 - Jail records are researched to build
7 on the associate list pertaining to
8 Warren L. Forrest.
- 9 13 June, 1978 - Detective Maas is contacted by a citizen
10 who provides an additional investigative
11 lead on the Barbara Ann Derry homicide.
- 12 16 June, 1978 - Radio logs from the Clark County Sheriff's
13 Office are researched for calls adjacent
14 to the dates and times of the female
15 disappearances.
- 16 27 June, 1978 - Military records pertaining to Warren L.
17 Forrest are received.
- 18 26 June, 1978 - Report from Dr. David Kessler is received
19 which indicates to investigators that he
20 concurs with the findings of Dr. Edward M.
21 Scott, state's psychiatric expert.
- 22 19 June, 1978 - Dr. Edward M. Scott initiates interviews
23 with selected witnesses from the Wightman,
24 Countryman, Blake investigations.
- 25 22 June, 1978 - School records are researched for additional
26 investigative leads.
- 27 22 June, 1978 - All officer notes are compiled.
- 28 28 June, 1978 - Additional information package is
29 transferred to Multnomah County
30 Sheriff's Office for more intensified
31 study of case similarities.
- 32 12 July, 1978 - Clark County Coroner reports that all
bones found by the search dogs were
found to have been from animal origin.
- 7 July, 1978 - A professional artist is utilized
to sketch some MO similarities
in this case.
- 13 July, 1978 - A meeting and conference takes place
between Robert Russler, Special Agent
with the FBI Behavioral Science
Unit and Detective Maas and Chief
Deputy Prosecuting Attorney Dennis
Hunter.
- 13 July, 1978 - One of the living victims, [REDACTED]
[REDACTED], now [REDACTED]
[REDACTED] is accompanied to Tukes
Mountain by Detective Maas and an

- 1 additional interview is conducted
2 and an additional crime scene
3 sketch is made.
- 4 17 July, 1978 - Contact is initiated with Mr. Ray
5 Bellgard, Chief Investigator of the
6 Santa Cruz County District Attorney's
7 Office for additional case assistance.
- 8 19 July, 1978 - Background investigation on Krista K.
9 Blake is intensified. Public records
10 are obtained and family contacts are
11 continued.
- 12 19 July, 1978 - Additional school records pertaining
13 to Warren L. Forrest and Jamie L.
14 Grissom are researched.
- 15 12 July, 1978 - Clark County Prosecuting's Office reviews
16 crime scene photographs, slides and video
17 tape pertaining to the Krista K. Blake
18 investigation.
- 19 August, 1978 - Dr. Edward M. Scott interviews additional
20 selected witnesses.
- 21 21 August, 1978 - Associate interviews of Warren L. Forrest
22 are initiated.
- 23 24 August, 1978 - Additional interviews at Western State
24 Hospital are conducted.
- 25 25 August, 1978 - The Washington State Crime Lab is requested
26 to conclude their examinations and compile
27 their report.
- 28 30 August, 1978 - MO experts from the California State
29 Department of Criminal Justice are
30 scheduled for contact with Clark County
31 Sheriff's Office investigators.
- 32 September, 1978 - This investigation continues.
Investigative log to date.
- 30 August, 1978 - Associate and witness interviews.
- 6 September, 1978 - Associate and witness interviews.
- 7-9 September,
1978 - VIA and M/O Charting with California
Department of Justice.
- 12 September,
1978 - [REDACTED] interview, artist reconstruction
and scene photographs obtained.
- 14 September,
1978 - Crime scene sketching of Crown Park
- 15 September,
1978 - Additional suspect background investiga-
tion cont.

- 1 18 September, 1978 - Columbian Library researched.
- 2
- 3 19 September, 1978 - Additional associate interviews.
- 4 19 September, 1978
- 5 - Additional witnesses (Arvidson & Mildred Laddusaw) located and interviewed.
- 6 20 September, 1978 - Additional associate interviews.
- 7
- 8 20 September, 1978 - Gates interview and scene photographs.
- 9 21 September, 1978
- 10 - Investigation regarding County employees with keys to parks property and DMV investigation on same.
- 11
- 12 25 September, 1978 - Additional photographs compiled.
- 13 25 September, 1978
- 14 - Investigation regarding Suspect Reserve Associates.
- 15 25 September, 1978
- 16 - VIA charting finalization.
- 17 26 September, 1978
- 18 - Additional associate interviews.
- 19 26 September, 1978
- 20 - Additional evidence to Washington State Crime Laboratory (Darts).
- 21 27 September, 1978
- 22 - Additional associate and witness interviews.
- 23 2 October, 1978
- 24 - Researched purchasing records for additional evidence.
- 25 2 October, 1978
- 26 - Additional witness interview (Renee Bradseth)
- 27 3 October, 1978
- 28 - Medical records pertaining to treatment of Wightman obtained and transferred to custody of coroner.
- 29 3 October, 1978
- 30 - Dr. Hamilton interviewed.
- 31 28 September, 1978
- 32 - Dr. Brady interviewed.
- 33 3 October, 1978
- 34 - Additional witness interview (Schleichart).
- 35 4 October, 1978
- 36 - Search of Skyline & Burnside conducted for additional evidence.
- 37

Based upon the ongoing investigation outlined above,

1 it is the position of the State that no delay has occurred in
2 the formal accusation of Warren Leslie Forrest in the above-
3 captioned case. Even should the court find a delay (as that
4 term is used in the cases), the defendant has not demonstrated
5 actual prejudice as required by Fifth Amendment due process and
6 case law concerning pre-accusation delay. Should the court find
7 that the defendant has demonstrated actual prejudice any
8 "delay" is reasonably justified by the complex nature of this
9 case, insufficient evidence to charge the defendant until the
10 information was filed, and the ongoing investigation concerning
11 six homicides. Dismissal, therefore, is not warranted.
12

13 II. THERE HAS BEEN NO DELAY IN THE FILING OF CRIMINAL
14 CHARGES IN THE PRESENT CASE.
15

16 As indicated above, an ongoing investigation concerning
17 six homicides which occurred in Clark County between 1972 and
18 1974, and the defendant's involvement in those homicides continues
19 to the present. At this time, the state is awaiting the final
20 report of the criminalist at the Washington State Crime Laboratory
21 as to certain items of evidence involved in the Blake homicide and
22 the Countryman abduction. In addition, the State has continued to
23 seek out and interview potential witnesses, and to gather additional
24 evidence.

25 It will be clear from a discussion of the facts of two
26 United States Supreme Court cases and the leading Washington
27 case concerning pre-accusation delay, that the term "delay" as
28 used by the courts contemplates the deference of formal accusation
29 of the defendant for a period of time after the investigation is
30 concluded and all the evidence is gathered. The three cases are:
31 U.S. v. Marion, 404 U.S. 307, 30 L.Ed.2d 463, 92 S.Ct. 455 (1971);
32 U. S. v. Lovasco, 431 U.S. 783, 52 L.Ed.2d 752, 97 S.Ct. 2044
(1977); State v. Haga, 8 Wn.App. 481, 507 P.2d 159 (1973).