CASE QUICK REFERENCE People v. Marcus Hale (fictional)

Case No. 26CR00412 | Fictional demonstration matter. Method and format are VDVLAW's actual work product standard; all case facts, persons and identifiers are invented.

NEXT APPEARANCE (FICTIONAL DEMO SETTING): Preliminary hearing, Thursday, October 15, 2026, 8:30 a.m., Dept. 2, Superior Court of California, County of Lassen

NEW IN THIS REVIEW

1. The first-autopsy body diagram is not located in the production reviewed; the claimed neck findings cannot be mapped without it (F1; EP-001).
2. The March 18 medical response is testable: the patient-care report, vitals, ECG, signed refusal, dispatch and gate records are not located (EP-003).
3. The re-examination was inconclusive (prior autopsy, embalming, decomposition) and documented cardiac disease; treatment artifacts remain unresolved against the neck findings (F1; EP-002).
4. The scene index identifies no weapon and no laboratory result independently establishing an assault (P1; F1; EP-007).
5. The special-circumstance allegation repeats apparently identical prior entries; certified priors are not located (EP-010).

DECISION QUESTION FOR COUNSEL

Whether to authorize the expert phase (forensic pathology, cardiology) and the records and preservation plan before the October 15 preliminary hearing, while the penalty decision is pending. For counsel to accept, modify or reject (DEC-001, DEC-005).

CHARGE AND EXPOSURE (COMPLAINT FILED JUNE 3, 2026, D1 BATES 000001-000007)

Count / allegation	Statutory range	Current status	Not established
Ct. 1: Pen. Code, § 187, subd. (a). Murder of Renee Hale.	First degree: 25 years to life; second degree: 15 years to life (Pen. Code, § 190, subd. (a)).	Complaint does not specify degree; cause of death is the contested center of the case.	**Cause of death (EP-001 to EP-003); degree.**
Special circumstance: Pen. Code, § 190.2, subd. (a)(2), prior murder conviction.	If first degree and found true under § 190.4: death, or life without parole (§ 190.2, subd. (a)).	Alleged with prior and strike allegations; no penalty election announced.	**Certified prior record (EP-010); penalty election (Q-005).**

Exposure note: this is a potential capital case. Penalty exposure turns on degree, the § 190.4 finding, and the People's election; mitigation-readiness planning proceeds while the decision is pending (DEC-004).

CASE SNAPSHOT

Client	Marcus Hale, CDCR CT-2210, Sierra Valley State Prison (fictional); in custody, no bail
Decedent	Renee Hale, 59, client's wife; died during a family visit, Unit 3 (fictional)
Case numbers	26CR00412, Lassen County; D.A. 26-0947; SVR-25-0318; Log 41207 (fictional)
Incident	March 17 to 19, 2025 visit; medical response March 18; found unresponsive early March 19; pronounced 2:36 a.m.
Forensics	First autopsy Apr. 14, 2025: manual neck compression; re-examination Feb. 10, 2026: inconclusive, cardiac disease documented
Filings	Complaint June 3, 2026; arraignment June 5, 2026 (fictional)
Next date	Preliminary hearing, October 15, 2026 (fictional demo setting)
Penalty status	**No penalty election announced; death not ruled out (Q-005).**
Counsel	Elena R. Castillo, SBN 999234; DDA M. Okafor; Hon. K. Marsh (fictional)
Client communication	Faretta status letter drafted for counsel review (doc. 07)

POINTS ON EACH SIDE

Prosecution points	Defense points
1. The first autopsy attributes death to manual neck compression: petechiae and focal neck hemorrhage (F1). **2.** The client and the decedent were alone in the family-visiting unit overnight (D1). **3.** The two interviews differ on a handling detail after discovery (I1; EP-004). **4.** Relationship stress and an insurance reference in the calls (C1; EP-005). **5.** The § 190.2, subd. (a)(2) allegation raises the stakes if the priors verify (D1).	**1.** The re-examination was inconclusive and documented significant cardiac disease (F1). **2.** Pre-visit calls document palpitations, dizziness, medication issues; home reading pulse 118, BP 154/92 (C1). **3.** The March 18 evaluation with a documented refusal is testable; its records are not located (EP-003). **4.** Treatment artifacts (CPR, AED, airway, movement, embalming) are unresolved against the neck findings (EP-002). **5.** No confession, no threat, no weapon, and no independent laboratory proof of assault in the reviewed material (C1; I1; P1; F1).

ITEMS TO CONFIRM BEFORE THE PRELIMINARY HEARING

[ ] First-autopsy support package, incl. body diagram	[ ] March 18 responder, refusal, dispatch, gate records
[ ] Original interview recordings (handling detail)	[ ] Insurance policy source documents
[ ] Certified prior-conviction records (§ 190.2(a)(2))	[ ] Native ECG or monitor data, if it exists
[ ] Count, tower, and gate logs for the overnight	[ ] Original photographs with timing metadata

HEARING NOTES

Prosecution position	Defense response	Court direction / next date