DETAILED SOURCE REVIEW AND EVIDENCE AUDIT

People v. Marcus Hale (fictional) | Superior Court of California, County of Lassen | Case No. 26CR00412 | D.A. No. 26-0947

Counsel copy, provided on request | Prepared by VdVLaw, Legal Support Services | August 20, 2026

Fictional demonstration matter. Method and format are VDVLAW's actual work product standard; all case facts, persons and identifiers are invented.

Reading guide

This audit is the working file behind the delivered Summary and Quick Reference. Section 1 inventories the production and maps the ranges used. Section 2 is the source registry, with what each source can and cannot establish. Section 3 is the evidence problem log, EP-001 onward. Section 4 analyzes the charge, the special circumstance, and the penalty posture. Section 5 lists material not located in the production reviewed. Section 6 reconciles the media inventories. Section 7 is the open questions register. Section 8 is the request schedule. Section 9 is the table of authorities. Section 10 collects the questions for counsel.

Identifiers are stable and are never renumbered. "Not located in the production reviewed" means exactly that; it is not a finding that an item is missing, destroyed or withheld, and no assertion of intentional withholding is made anywhere in this file.

1. Production inventory and range map

Category	Produced	Note
Documents	4,126 Bates pages (D1 000001-004126)	Complaint 000001-000007; incident and investigation package 000212-000388; family-visiting application and approval records 000401-000466; count, log, and movement excerpts 000502-000517; coroner correspondence 000601-000640; prior-conviction abstract copies 000701-000709; balance is administrative, custodial, and index material.
Medical	642 pages (M1 MED000001-MED000642)	Decedent visiting-related screening pages; institutional response notes for March 18 and March 19; pronouncement record; a partial outside-records set the coroner gathered.
Forensic	2 autopsy reports or reviews; 3 toxicology or laboratory packets (F1)	First autopsy April 14, 2025 (F000001-F000034); defense-requested re-examination February 10, 2026 (F000035-F000061); toxicology and laboratory packets F000062-F000119. The first-autopsy support package (diagram, notes, photograph log) is not in the set (EP-001).
Calls and interviews	97 call files (95 unique); 8 recorded interviews (C1; I1)	Prison call audio with machine-generated working transcripts; two client interviews (June 3 and June 9, 2025 references in the package); six witness and staff interviews.

Category	Produced	Note
Media	19 video files; 108 audio files; 236 photographs (V1; A1; P1)	Indexed only; nothing reviewed at content level. Photograph index: 31 emergency-response, 118 scene and unit, 64 autopsy, 23 administrative.
Digital and administrative exports	11 exports (X1)	Messaging export with the relationship exchanges; visiting-system extracts; phone-system logs; insurance reference appears in the call index, not as a policy document.

Pinpoints used in this review: complaint D1 000001-000007; incident package D1 000212-000388; March 19 response and pronouncement M1 MED000418-MED000466; first autopsy F1 F000001-F000034; re-examination F1 F000035-F000061; pre-visit calls C1 index entries 41 to 58; client interviews I1 items 1 and 2. Repository total 11.84 GB. Citation shorthand: a source ID with a Bates or index pinpoint is the citation; the working indexes are search aids, never the citation.

2. Source registry

ID	Source	Can establish	Cannot establish
D1	Documents (4,126 pages)	The complaint and its allegations; the incident and investigation package; the visit approval and screening trail; count and log excerpts for the overnight; the two-person occupancy of Family Visiting Unit 3.	Cannot establish: the completeness of the overnight timeline (full count, tower, and gate logs not located); the special-circumstance predicate (the same alleged prior appears pleaded for multiple consequences and certified records are not located, EP-010).
M1	Medical (642 pages)	The March 19 response: unit call, CPR and AED use, pronouncement at 2:36 a.m. (MED000418-MED000466); visiting-related screening; fragments referencing a March 18 evaluation.	Cannot establish: the March 18 response itself; the patient-care report, vitals, any ECG, and the signed refusal are not located (EP-003); the decedent's cardiac history beyond the partial set gathered by the coroner.
F1	Forensic (2 examinations; 3 laboratory packets)	The first-autopsy opinion (manual neck compression; conjunctival petechiae; focal neck-muscle hemorrhage); the re-examination's limits and its documentation of significant cardiac disease; negative screens in the produced toxicology.	Cannot establish: the mapped location and character of the neck findings (body diagram not located, EP-001); separation of treatment artifacts from the claimed findings (EP-002); any laboratory result independently establishing an assault (EP-007).

ID	Source	Can establish	Cannot establish
C1	Calls (97 files; 95 unique)	What the working transcripts report, subject to audio verification (EP-009): pre-visit symptoms (palpitations, dizziness, nausea, medication uncertainty, a missed dose, the home reading of pulse 118 and blood pressure 154/92); the dinner plan; relationship friction; one insurance reference.	Cannot establish: any confession, threat, or stated plan to end the relationship (none appears in the reviewed transcripts); quotation-grade wording (working transcripts are search aids, EP-009); the insurance reference as a motive (policy documents not located, EP-005).
I1	Interviews (8 recordings with working transcripts)	What the working transcripts report, subject to audio verification (EP-009): a consistent major sequence across the client's two interviews (illness, evaluation, transport recommendation, refusal, dinner, count, discovery, call for help); staff accounts of the response.	Cannot establish: which handling account is accurate (the two client interviews differ on one post-discovery detail; original audio not heard, EP-004); demeanor characterizations (not verifiable from transcripts).
V1	Video (19 files)	Existence and general subject from the index: unit exterior, corridor, and response-period coverage references.	Nothing established from content: none viewed (EP-009); referenced overnight coverage of the unit corridor is not clearly among the 19 files (Q-007).
A1	Audio (108 files)	Existence and general subject from the index: the 97 calls, the 8 interviews, and 3 radio or dispatch excerpts.	Nothing established from content: none heard (EP-009).
P1	Photographs (236 indexed)	Group counts and timing from the index: 31 emergency-response, 118 scene and unit, 64 autopsy, 23 administrative; the index identifies no weapon.	Cannot establish: findings from photographic content (none inspected at full resolution); artifact-versus-finding questions (originals with timing metadata not located, EP-008).
X1	Digital and administrative exports (11)	The messaging exchanges with emotional language; visiting-system extracts; phone-system logs supporting the call index.	Cannot establish: authorship of particular messages (account-access records not located, EP-006); completeness of the export against the source systems.

3. Evidence problem log

ID	Defect	Why it matters	What would resolve it
EP-001	The first-autopsy support package, including the body diagram, dissection notes, photograph log, original images, histology, and specimen inventory, is not located (F1).	The homicide opinion rests on findings that cannot be mapped, given to a defense expert with precision, or tested without the package.	The complete support package from the coroner and the District Attorney (PR-001, PR-002).
EP-002	Treatment and post-mortem artifacts (CPR, AED use, airway management, body movement, embalming) are unresolved against the claimed neck findings (F1; M1).	The re-examination attributes its own limits partly to these artifacts; a pathologist needs the source materials to separate artifact from finding.	Support package plus responder records; expert review if authorized (PR-001, PR-004; DEC-001).
EP-003	The March 18 medical-response records (patient-care report, vitals, any ECG, the signed refusal, dispatch and gate records) are not located (M1; D1).	Both interviews describe the episode; the records were created before any homicide theory existed and would test the natural-cause question from a neutral source.	Institution health records, fire and EMS records, dispatch and gate logs (PR-003, PR-004).
EP-004	The working transcripts of the client's two interviews differ on one post-discovery handling detail: rolled her shoulder and lifted her chin, against touched only her jaw and wrist (I1).	The difference is characterized by the investigation as an inconsistency; it cannot be evaluated without the original recordings and the first-responder observations.	Original audio; responder statements (PR-001, PR-007; Q-003).
EP-005	The insurance policy, ownership, beneficiary designations, and change history are not located; the production carries one call reference (C1; X1).	The claimed financial motive rests on a reference, not a document; ownership and change history could support either side.	Carrier records through counsel's route (PR-005).
EP-006	Account-access and authorship records for the messaging exchanges are not located (X1).	Emotional language is evidence of friction in that exchange only; attribution and completeness are open.	Provider account records; device or account-access logs (PR-002).

ID	Defect	Why it matters	What would resolve it
EP-007	No laboratory result in the produced packets, and no other physical evidence in the production reviewed, independently establishes an assault; the scene index identifies no weapon, though the alleged mechanism requires none (P1; F1).	The physical case is, at present, the pathology dispute itself; counsel should know that before the preliminary hearing.	Confirmation from the District Attorney that the production is complete on this point (PR-001).
EP-008	The photograph index shows the emergency-response group postdating the medical intervention; originals with timing metadata are not located (P1).	Artifact-versus-finding analysis requires timing; indexed copies cannot carry it.	Originals with metadata under a media-handling protocol (PR-007).
EP-009	The working transcripts are machine-generated search aids; no audio was heard and no video was viewed in preparing the package (C1; I1; V1; A1).	No quotation, impeachment use, or content assertion may rest on a transcript or an index line without verification against the original.	Verification against originals as each use arises (PR-007).
EP-010	The produced allegations appear to use the same prior conviction for multiple pleaded consequences (the § 190.2, subd. (a)(2) predicate and the separate prior-conviction and strike allegations), which may be proper pleading; certified prior records are not located and no allegation is verified (D1).	The special-circumstance predicate, the potential capital exposure, and the separate sentencing consequences (Pen. Code, §§ 667, 1170.12) all rest on the same unverified prior; the exposure picture is incomplete until it is verified allegation by allegation.	Certified records from the originating court (PR-006; Q-006).
EP-011	Two of the 97 call files are byte-identical duplicates of other files in the set; the register carries 95 unique calls (C1).	File counts overstate the evidence; any quantitative statement must use the duplicate-controlled figure.	Resolved in the register; carried here for transparency.

4. Charge analysis

Count 1: Pen. Code, § 187, subd. (a), murder

Element	Prosecution reading	Defense testing point
Act causing death	The first autopsy attributes death to manual neck compression; the client and the decedent were alone in the unit overnight (F1; D1).	The opinion's support package is not located in the production reviewed (EP-001); the re-examination is inconclusive and documents significant cardiac disease; treatment artifacts are unresolved (EP-002).
Malice	Relationship friction in the messages; the insurance reference; the interview-transcript handling-detail difference presented as consciousness of guilt (X1; C1; I1).	No confession, threat, or stated plan appears in the working transcripts reviewed; authorship is unverified (EP-006); the motive rests on a reference, not a policy (EP-005); the detail difference is untested (EP-004).
Degree	Not specified in the complaint; premeditation would rest on the same contested inferences.	The March 18 documented illness and refusal, if corroborated, was recorded before any homicide theory existed (EP-003).

The special circumstance and the penalty posture

Pen. Code, § 190.2, subd. (a)(2) alleges a prior murder conviction. If the murder is first degree and the special circumstance is found true under § 190.4, the penalty is death or life without parole (§ 190.2, subd. (a)). The People have not announced an election (Q-005). The produced abstract copies appear to plead the same prior conviction for multiple consequences, which may be proper pleading, and certified records are not located (EP-010); the predicate is treated as unverified. The separate prior-conviction and strike allegations may carry additional sentencing consequences (Pen. Code, §§ 667, 1170.12), including the serious-felony enhancement and the doubling of the minimum term of an indeterminate term; these are not calculated pending the allegation language and the certified prior record. Mitigation-readiness planning is recommended now, while the decision is pending, because the records, history, and staffing it requires cannot be assembled quickly after an election (DEC-004). No prediction about the election is made.

The client-communication and Faretta posture

The client has raised self-representation. Faretta v. California (1975) 422 U.S. 806, 819 places the right with the accused; any waiver of counsel must be knowing and intelligent, made with awareness of the dangers and disadvantages of self-representation (id. at pp. 835-836); and the decision and any hearing are matters for the client, counsel, and the court. The drafted status letter (document 07) is plain-language decision support for counsel to review, adapt, and send or withhold (DEC-003); it takes no position on the choice and gives no legal advice.

5. Material not located in the production reviewed

Item	Bearing on the case
First-autopsy support package: body diagram, notes, photograph log, original images, histology, specimen inventory	The foundation of the homicide opinion; without it the findings cannot be mapped or independently examined (EP-001, EP-002).
March 18 responder records: patient-care report, vitals, any ECG in native format, signed refusal, dispatch and gate records	The corroboration test for the documented illness episode; created before any homicide theory existed (EP-003; Q-001, Q-008).
Original interview recordings	The handling-detail difference and any quotation or impeachment use (EP-004, EP-009).
Insurance policy source documents: policy, ownership, beneficiaries, change history	The claimed financial motive (EP-005).
Certified prior-conviction records	The § 190.2, subd. (a)(2) predicate, the separate prior and strike consequences, and the potential capital exposure (EP-010).
Count, tower, and gate logs for the overnight, complete	The timeline and who had access to the unit (D1 excerpts only).
Photograph originals with timing metadata	Treatment-artifact analysis and the response sequence (EP-008).
Account-access records for the messaging exchanges	Authorship and completeness of the relationship evidence (EP-006).

Nothing in this table is described as missing or withheld; each item is not located in the production reviewed, and the request schedule asks each custodian to confirm what exists. If a targeted request later establishes that an identified record exists, is within the People's control, is material, and is not produced without adequate explanation, counsel can reassess the wording on that developed record.

6. Media inventories, reconciled

Type	Produced	What the records imply	State
Video	19 files	The index references unit exterior, corridor, and response-period coverage.	Referenced overnight corridor coverage is not clearly among the 19 files; reconciliation is open (Q-007). None viewed.
Audio	108 files	The 97 calls (95 unique after duplicate control, EP-011), the 8 interviews, and 3 radio or dispatch excerpts. 97 + 8 + 3 = 108.	None heard; no proposition rests on audio content (EP-009).
Photographs	236 files	Index groups: 31 emergency-response, 118 scene and unit, 64 autopsy, 23 administrative. 31 + 118 + 64 + 23 = 236.	None inspected at full resolution; originals with timing metadata not located (EP-008).

Type	Produced	What the records imply	State
Working indexes	11.84 GB mapped	VdVLaw-built search aids over the repository.	Search aids only; the source pinpoint is the citation, never the index.

7. Open questions register

ID	Question	Route to resolution
Q-001	What do the March 18 responder records show: vitals, rhythm, the evaluation, and the documented refusal?	Institution health records; fire, EMS, and dispatch records (PR-003, PR-004).
Q-002	Where is the first-autopsy support package, and what does the body diagram map?	District Attorney and coroner production (PR-001, PR-002).
Q-003	What do the original recordings show on the handling detail, in the client's own words?	Original interview audio (PR-007).
Q-004	What are the institution's family-visiting medical-response and visitor-screening procedures, and what do the records show was done?	Policy production and the visiting file (PR-001, PR-002).
Q-005	Will the People seek death? What is the timeline for the decision?	Counsel-to-counsel; the court may set a status date (DEC-004 proceeds meanwhile).
Q-006	Do certified records verify the alleged prior murder conviction, and does the record support each pleaded use of it (special circumstance, prior conviction, strike)?	Certified records from the originating court (PR-006).
Q-007	Which staff responded overnight, what did each observe, and does the referenced corridor video exist?	Incident package follow-up; preservation and media requests (PR-002, PR-007).
Q-008	Does native ECG or monitor data exist from the March 18 evaluation?	Fire, EMS, or institutional equipment records (PR-004).

8. Request schedule

ID	Recipient	Records sought	Channel, authority, mechanics
PR-001	District Attorney, County of Lassen (fictional office-holder)	Complete first-autopsy support package including the body diagram; original interview recordings; March 18 medical-response records; complete incident, count, tower, and gate records for Unit 3; laboratory and toxicology source packets; photograph originals with metadata; confirmation of completeness on the no-laboratory-proof point.	Channel: informal discovery letter under Pen. Code, §§ 1054.1 and 1054.5, subd. (b) (15-day informal procedure before court enforcement). Urgency: first, now; the October 15 preliminary hearing controls.
PR-002	Custodians identified in the record (all fictional): institution litigation coordinator, investigative services and evidence, visiting and control, health-care administration, fire and emergency-response unit, outside EMS provider if any, dispatch, coroner, messaging provider	Preservation of originals: media, logs, specimens, histology, native files, account records; retention schedules; if an item is unavailable, whether it existed, the retention period, the overwrite date, and the search performed.	Channel: preservation notices, drafted for counsel as document 08. Urgency: now; retention degrades. Trombetta and Youngblood (table of authorities) frame any later motion realistically; no destruction is asserted.
PR-003	Institution health-care administration and Health Information Management (fictional)	The March 18 response records; visiting-related screening; the decedent's institutional-contact medical pages; the decedent's outside medical, cardiology, and pharmacy records through the route counsel directs.	Channel: health-records release process for institutional records; counsel-directed authorization or subpoena route for outside records of a decedent. Urgency: with PR-001.

ID	Recipient	Records sought	Channel, authority, mechanics
PR-004	Fire and emergency-response unit; outside EMS provider if any; dispatch (fictional)	Run record, patient-care report, CAD, radio traffic, refusal documentation, native ECG or monitor data if it exists.	Channel: records requests through counsel; subpoena if refused. Urgency: with PR-002; equipment data cycles.
PR-005	Insurance carrier (fictional)	Policy, face amount, ownership, beneficiary designations, applications, change history, payment records, any claim activity.	Channel: counsel-directed request or subpoena. Urgency: after PR-001 framing; the motive question is not hearing-critical but shapes it.
PR-006	Superior court of the originating county for the alleged prior (fictional identifiers)	Certified copies of the judgment, abstract, plea or verdict record, and commitment for the alleged prior murder conviction.	Channel: certified-records request. Urgency: now; the § 190.2, subd. (a)(2) predicate is central to the penalty posture (Q-006).
PR-007	District Attorney and institution custodian of media (fictional)	Media originals: the 8 interview recordings, priority call audio, the 19 video files and any referenced corridor coverage, photograph originals with timing metadata.	Channel: media-handling protocol counsel approves; hash-verified copies. Urgency: after the PR-001 response.

9. Table of authorities

Alphabetical by case, then statutes. Full formal citations with parallel reporters where they exist; short form with the pinpoint in running text. Authority verified August 20, 2026 against official or primary sources: the statutes against the codified text, and the case pinpoints and parallels against published opinions. Demonstration copy: re-verify before any filing use.

Authority	Proposition
Arizona v. Youngblood (1988) 488 U.S. 51, 58 [109 S.Ct. 333, 102 L.Ed.2d 281]	Failure to preserve potentially useful evidence violates due process only on a showing of bad faith; frames any preservation motion realistically.
California v. Trombetta (1984) 467 U.S. 479, 488-489 [104 S.Ct. 2528, 81 L.Ed.2d 413]	Preservation duty attaches to evidence with apparent exculpatory value not reasonably obtainable by other means; frames the body-diagram, specimen, and media requests. No destruction is established on this record.
Faretta v. California (1975) 422 U.S. 806, 819, 835-836 [95 S.Ct. 2525, 45 L.Ed.2d 562]	The Sixth Amendment right of self-representation belongs to the accused; waiver of counsel must be knowing and intelligent, made with awareness of the dangers and disadvantages of self-representation. Frames the client-communication posture only.
People v. Sanchez (2016) 63 Cal.4th 665, 686 [204 Cal.Rptr.3d 102, 374 P.3d 320]	An expert may not relate case-specific hearsay as true unless independently proven or covered by an exception; bears on the pathology, coroner, and toxicology opinions and on the support-package requests.
Pen. Code, § 187, subd. (a)	Murder: the unlawful killing of a human being with malice aforethought. Count 1.
Pen. Code, § 190, subd. (a)	Punishment for murder: first degree, 25 years to life; second degree, 15 years to life, subject to the enumerated exceptions.
Pen. Code, § 190.2, subds. (a), (a)(2)	Death or life without parole where a special circumstance is found true; subdivision (a)(2), a prior conviction of murder in the first or second degree.
Pen. Code, § 190.4	Procedure for determining the truth of special circumstances and for the penalty determination.
Pen. Code, § 667	Serious-felony enhancement (subd. (a)(1)) and Three Strikes provisions (subds. (b)-(i)), including doubling of the minimum term of an indeterminate term; the separate allegations' consequences are not calculated (EP-010).
Pen. Code, § 1170.12	Initiative Three Strikes provisions paralleling § 667, subds. (b)-(i); same posture.

Authority	Proposition
Pen. Code, § 1054.1	Prosecution disclosure duties to the defense, including relevant real evidence, reports, and exculpatory evidence.
Pen. Code, § 1054.5, subd. (b)	Enforcement: informal request to opposing counsel, with court enforcement available 15 days after the informal request; supports PR-001.

10. Questions for counsel

DEC-001: whether to retain a forensic pathologist now, instructed from source materials, for the petechiae, neck-finding, and treatment-artifact questions. DEC-002: whether to retain a cardiology or internal-medicine consultant on the pre-visit symptoms, the March 18 episode, and the documented cardiac disease. DEC-003: how to handle the client's Faretta question, including whether to send the drafted status letter (document 07). DEC-004: mitigation-readiness planning while the penalty decision is pending. DEC-005: whether to authorize the full records and preservation plan (PR-001 through PR-007) now or in stages. Each is a recommendation for counsel to accept, modify or reject.

Status of this document

VdVLaw is not a law firm and does not provide legal advice. This audit is attorney-directed litigation support work product, held in the matter file and provided to counsel of record on request. Robert van der Vijver is not an attorney and is not counsel of record. Nothing here is a legal opinion, a medical opinion, or a legal conclusion. Any course of action identified is a recommendation for counsel to accept, modify or reject.

Methodology and limitations

AI tools assisted with organization, indexing, transcript preparation, cross-referencing, and drafting, directed by VdVLaw, which specified the sources and comparisons and required source-grounded results. No audio was heard, no video was viewed, and no photograph was inspected at full resolution; the registry marks those limits source by source. Assertions were cross-checked internally but not re-verified line by line; original records and media control. This demonstration copy is built on a fully fictional record.