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OFFICE OF KING COUNTY PROSECUTING ATTORNEY

REQUEST FOR ADDITIONAL INVESTIGATION

TO:	Deputy Joshua G. Lambert	DATE:	May 24, 2016
	King County Sheriff's Office	CASE#	15-143510 / 15-201020
FM:	Richard L. Anderson	FILE:	033519992
	Senior Deputy Prosecuting Attorney	CCN:	1932502
Phone:	(206) 477-6184		

RE: Joshua Clell Brown

Co-defendants: CCN:

The following further investigation is necessary:

☒ The following item(s) must be completed before charges will be filed.
☐ The following item(s) must be completed as soon as possible.

DUE DATE: 6/22/16

☒ Witness Statement:

Det. Ostrum,

I know you are very familiar with this case, so I will not waste your time with a detailed recitation of the facts of the involved incidents. In short, let me just say that we had a number of meetings with the victim to get more information about the alleged incidents and other incidents that would have corroborating evidence that we could use at trial to combat some of the anticipated defense strategies.

During our discussions, the victim mentioned a number of individuals who witnessed parts of or entire incidents of abuse between the victim and suspect. As you know, the nature of the anticipated testimony from these individuals is such that a jury would have extreme difficulty finding the defendant guilty unless we were able to produce these witnesses at trial. Some of these witnesses include the victim's sons, her parents, and several friends/neighbors who the victim told us she spoke with / ran to after incidents of violence between them. These are not people that could be readily explained as unavailable if they did not testify. Absent statements from them, we are unable to assess the strength of the victim's testimony and whether it would be sufficient to carry our burden of proof at trial.

I am aware (because you and I have talked about it) that the victim's level of cooperation with you and law enforcement has been tumultuous because of her ongoing relationship and interactions with the suspect, and I know it has been very challenging to obtain the requested information. I trust you understand that this MI is not a reflection on you, but only on the state of the case as it currently stands.

Absent further evidence/testimony/statements from the above listed individuals (at a minimum – there may be others that would also be relevant that are brought to light as a result), the State is unable to file these charges. If the victim does not wish to continue prosecution, or if she declines to assist you in obtaining and providing access to these witnesses, then you may consider this a decline of formal charges in these cases.

PLEASE RETURN A COPY OF THIS REQUEST WITH THE NEW INFORMATION

NOT FOR DISCOVERY