EVIDENCE COLLECTION CHECKLIST
PART I: TESTIMONY AND BACKGROUND EVIDENCE

- Psychological/psychiatric evaluation of victim (when consent, undue influence, or capacity may be an issue)
- Victim testimony or deposition with full-cross examination, as soon as possible after charging
  \((\text{Crawford v. Washington})\)
- Videotape the victim at the early stage of the investigation, including the following:
  - Orientation—victim’s perception of time, place, and person

FACTS:
- Consent
- Identity of suspect
- Review documents/evidence. Have victim sign his or her name in video to compare to signature on questioned documents.
- Impact of crime. Include a walk-through video of a neglect or abuse crime scene if possible

MEDICAL EVIDENCE, INCLUDING:
- Medications. Include actual bottles/containers for prescriptions to show physician and pharmacy, possession and full/empty status given recommended dosage over time from the date of the last refill.
- Medical records of current and underlying conditions

Sources of Information:
- Emergency Room
- Treating physicians
- Nursing facilities
- Pharmacy
- Dentists
- Other

Specific Types of Documents to Request:
- Lab reports
- Nurses’ notes
- X-rays
- Social workers’ notes
- Adult Protective Services (APS) records of current and prior contacts
- All law enforcement contacts with involved parties and witnesses, including:
  - 911 tapes
  - Arrest reports
  - Jail records, including:
    - Phone calls
  - Criminal histories
  - Visitor logs by or on behalf of suspects
PART I: TESTIMONY AND BACKGROUND EVIDENCE, CONT.

Financial records
- Credit card records
- Credit reports
- Victim’s bank records
- Investment account records
- Suspect’s bank records
- Checkbook registers

Legal documentation
- Powers of attorney
- Court/protection orders
- Property deeds
- Advanced care directives/living wills
- Prior civil cases
- Wills and trusts
- Conveyances
- Guardianship/conservatorship documents

Consultation with Experts
- Handwriting analysts
- Forensic accountants
- Wound care experts
- Civil attorneys
- Geriatricians
- Geriatric psychologists and psychiatrists
- Medical examiner
PART II: INTERVIEWS AND PHYSICAL EVIDENCE

INTERVIEWS

Witnesses who can describe the victim’s condition, activities, and level of functioning and interaction with the defendant at time of incident and before. Include a description of changes over time.

Possible witnesses:
- Family and friends
- Banking/financial
- Hair stylists/barbers
- Local businesses
- Adult day care services
- Adult Protective Services
- Civil attorneys

Various community “gatekeepers”:
- Delivery personnel
- Meter readers

PHYSICAL EVIDENCE - include an inventory

Photo and video documentation

Crime scene, including, if relevant:
- Contents of refrigerator, cupboards, medicine cabinets [include actual bottles/containers for prescriptions to show physician and pharmacy, possession and full/empty status given recommended dosage over time from the date of the last refill].

Suspect’s living area
- Victim’s living area
- Major new purchases made by the suspect
- Victim’s body
- Injuries over time

Clothing victim was wearing at time of incident (include adult diapers if applicable)
- Bedding
- Writings/journals/letters
- Address books and calendars
- Defendant’s computer, flash drives, etc.
- Legal file from victim’s civil attorney
- Nutritional supplements
- Restraints and bindings

Locks on outside of doors
- Photos and videos related to conduct
- Defendant’s and victim’s ISP records
- Medications and medical supplies
- Assistive devices (or lack thereof)
- Receipts for purchases
- Checkbooks, check registers