

DAVIDSON

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF CLARK

STATE OF WASHINGTON, )

Plaintiff, )

No. 1 0 2 6 4

vs. )

MEMORANDUM IN OPPOSITION  
TO DEFENSE MOTION TO  
DISMISS BASED ON PRE-  
ACCUSATION DELAY.

WARREN LESLIE FORREST, )

Defendant. )

I. INTRODUCTION

Homicide victim, Krista Blake, was last seen alive on July 11th, 1974. The State has charged Warren Leslie Forrest with First Degree Murder for the July 11th, 1974, slaying of Ms. Blake. It is the State's position that the Blake homicide is but an isolated occurrence in a series of unsolved homicides occurring between 1972 and 1974, in Clark County. Such homicides, have been under continual investigation since January of 1972. To fully understand the complexity of this case as well as the ongoing nature of said investigation, any inquiry relative to the above captioned case must begin with the January 10th, 1972, disappearance of Jamie R. Grissom.

10 January, 1972 - Jamie R. Grissom reported missing. Clark County Case #72-8456. No leads at this time.

11 February, 1972 - Barbara Ann Derry, a later homicide victim. Clark County Case #72-86848. Was last seen hitchhiking on State Highway 14 from Vancouver, Washington.

29 March, 1972 - Unidentified body, homicide victim, was located in the grist mill in the northern part of Clark County.

- 1 31 March, 1972 - The unidentified body located is  
2 identified as that of Barbara Ann  
3 Derry, date of birth 1/21/54. White  
4 female.
- 5 1 May, 1972 - Identification of Jamie R. Grissom  
6 is located in the Dole Valley area.  
7 No additional leads as to the where-  
8 abouts of Jamie R. Grissom at this  
9 time.
- 10 31 March, 1972 - Active investigation of the Barbara  
11 through January, 1973 Ann Derry homicide continues by  
12 several Clark County investigators.
- 13 19 January, 1973 - Detective Songer is assigned the  
14 continuing investigation of the  
15 Barbara Ann Derry homicide and  
16 continues active investigation of  
17 this case primarily concentrating  
18 on associate contacts through May  
19 of 1973.
- 20 25 January, 1974 - Detective Songer is continuing  
21 the investigation of Barbara Ann  
22 Derry concentrating on selected  
23 suspects who have originated  
24 through other agency similar  
25 cases.
- 26 31 May, 1974 - Gloria Nadine Knutson is last seen  
27 in the downtown Vancouver area.
- 28 4 June, 1974 - Gloria Nadine Knutson is reported  
29 as a missing person to Sgt. C.  
30 Hansen, Vancouver Police Department.
- 31 20 January, 1974 - Follow-up regarding Gloria Knutson  
32 continues by Officer Slocum, Vancouver  
Police Department. Contact is made  
at that time with Knutson's parents.  
No active leads are developed at this  
time.
- 11 July, 1974 - Krista K. Blake is last seen in  
the area of 29th and "K" Street,  
Vancouver, Washington.
- 16 July, 1974 - Sgt. Garry Lucas, Clark County  
Sheriff's Office is contacted by  
an associate of Gloria Nadine  
Knutson who gives additional  
information that she was in fact  
last seen in the downtown  
Vancouver area on 31 May, 1974.
- 17 July, 1974 - White female by the name of [REDACTED]  
[REDACTED] is abducted from  
the Ridgefield area. Clark County  
Sheriff's case #74-7085.
- 18 July, 1974 - [REDACTED] is located

- 1 at Tukes Mountain and reports her  
2 abduction to Deputy Pillsbury of  
the Clark County Sheriff's Office.
- 3 19 July, 1974 - Officer Griffith, Vancouver  
4 Police Department continues follow-  
5 up on the disappearance of Gloria  
6 Nadine Knutson by contacting  
7 additional associates. No additional  
8 leads are developed at this time.
- 9 22 July, 1974 - [REDACTED] is reinterviewed  
10 by Deputy Pillsbury and further submits  
11 to a polygraph examination administered  
12 by Dr. Walter Lindsay.
- 13 22 July, 1974 - Deputy Pillsbury contacts two additional  
14 witnesses. One Willa Esteb and a Richard  
15 Lahti who gave additional information in  
16 regards to the sighting of the blue van  
17 in the area of Tukes at the time of  
18 [REDACTED] abduction.
- 19 22 July, 1974 - Detective Dick Stanley of the Clark  
20 County Sheriff's Office is assigned the  
21 continuing investigation into the abduct-  
22 ion of [REDACTED] and at this  
23 time no additional investigative leads  
24 are developed.
- 25 30 July, 1974 - Mrs. Colleen Blake of Rowland Heights,  
26 California, reports via letter to the  
27 Clark County Sheriff's Office that her  
28 daughter, Krista K. Blake, is missing.  
29 This letter is subsequently transferred  
30 to Detective Buller of the Clark County  
31 Sheriff's Office but no investigative  
32 leads are observed at this time.
- 2 August, 1974 - Carol Valenzula is last seen in the  
area of downtown Vancouver.
- 4 August, 1974 - Carol Valenzula is reported as a missing  
person to the Camas Police Department.
- 24 August, 1974 - Friends of Carol Valenzula recontact the  
Camas Police Department to report that she  
is still in fact missing. There are  
no investigative leads at this time.
- 21 September,  
1974 - Detective Songer is continuing the investiga-  
tion into the Barbara A. Derry homicide by  
contacting additional suspects.
- 1 October, 1974 - [REDACTED] is abducted from the Portland  
area, raped, assaulted and left for dead in  
the area of Crown Park, Clark County,  
Washington.
- 2 October, 1974 - A search warrant is served in the residence  
of Warren Leslie Forrest and Warren Leslie  
Forrest is arrested for the kidnap and  
assault on [REDACTED]

- 1 3 October, 1974 - Dean Morgan, Public Defender's Office is  
2 appointed defense counsel for Warren L.  
3 Forrest.
- 3 9 October, 1974 - Warren Forrest enters a plea of not guilty  
4 and not guilty by reason of insanity and  
5 further the court appoints psychiatric  
6 experts to evaluate Warren L. Forrest.
- 6 10 October, 1974 - A line-up is conducted during which [REDACTED]  
7 [REDACTED] identifies Warren Leslie Forrest  
8 as her kidnapper and as the person who  
9 assaulted her.
- 8 10 October, 1974 - [REDACTED] also attends this  
9 line-up and is unable to identify Warren  
10 Leslie Forrest as the subject who  
11 abducted her.
- 11 12 October, 1974 - Two sets of bones believed to be of human  
12 origin are found in the Dole Valley area.
- 12 16 October, 1974 - Search by several investigators and other  
13 persons continues in the Dole Valley area  
14 for additional bones and the investigation  
15 is initiated concerning itself with the  
16 identification of two victims.
- 15 17 October, 1974 - Comparison of both sets of bones found in  
16 the Dole Valley area are compared with  
17 dental charts of Gloria Nadine Knutson  
18 with negative results.
- 18 22 October, 1974 - One of the sets of bones found in the  
19 Dole Valley area is identified as the  
20 remains of Carol Valenzula.
- 20 22 October, 1974 - The husband of Carol Valenzula is held as  
21 a material witness in the Clark County  
22 Jail.
- 22 24 October, 1974 - Warren L. Forrest signs a waiver of  
23 speedy trial.
- 23 29 October, 1974 - Detective John Howard recontacts  
24 Fred Laddusaw regarding the dis-  
25 appearance of Krista K. Blake and  
26 Mr. Laddusaw is unable to provide  
27 any new information.
- 26 30 October, 1974 - Dr. Guy A. Parvaresh is appointed  
27 to examine and evaluate Warren L.  
28 Forrest.
- 28 7 November, 1974 - The investigation into the Valenzula  
29 and unidentified victim homicide continues.  
30 The FBI is contacted for a source of  
31 identification on the unknown victim and  
32 investigation into the Valenzula homicide  
continues concerning itself with associate  
and suspect contacts.

- 1 7 November, 1974 - Deputy Greg Connors of the Clark County  
2 Sheriff's Office reinterviews ██████████  
3 ██████████ for additional information  
and gains no additional investigative  
leads from her.
- 4 12 November, 1974 - Willa Esceb and Richard Lahti are recontacted  
5 for additional information but no new  
6 investigative leads are gained into the  
abduction of ██████████
- 7 21 November, 1974 - Dr. Dean Harris is additionally appointed  
8 to examine Warren L. Forrest and evaluate  
his psychiatric condition.
- 9 20 November, 1974 - A background check of Warren L. Forrest  
10 is continued by detectives assigned to  
the investigation of the ██████████  
assault.
- 11 8 January, 1975 - Dr. McElhaney is additionally assigned  
12 a defense psychiatric expert for Warren L.  
Forrest.
- 13 23 January, 1975 - Warren L. Forrest is acquitted on grounds  
14 of insanity.
- 15 31 January, 1975 - Warren L. Forrest is committed to Western  
State Hospital, Ft. Steilacoom, Washington.
- 16 10 February, 1975 - Clark County Sheriff's Office receives a  
17 letter from Dean Morgan advising that he  
18 is still, at that time, representing  
Warren L. Forrest and that he wished  
that no investigators interview Warren L.  
Forrest.
- 19 19 March, 1975 - Jan Perez is interviewed and informs  
20 Clark County Sheriff's Office investigators  
21 that she cannot divulge any information  
regarding information she receives from  
Warren L. Forrest.
- 22 19 March, 1975 - A meeting is held at Seattle Police  
23 Department comprised of investigators  
24 from several northwest police agencies  
regarding their suspect, Theodore Bundy,  
25 and their cases which involved the death  
of several young female victims.  
26 Attending that meeting were investigators  
from the Clark County Sheriff's Office.  
27 The purpose being to compare our cases  
at that time with theirs.
- 28 11 June, 1975 - Continued attempts are being made to  
29 identify the unidentified female victim  
found in the Dole Valley area.
- 30 September, 1975 - Missing persons files on the west coast  
31 are again checked for attempts to identify  
the unidentified female victim.
- 32 October, 1975 - The Valenzula homicide investigation  
continues, however, no new investigative

- 1 leads are discovered. Investigation  
 2 continues concerning itself with the  
 3 identification of the unidentified  
 female victim from Dole Valley.
- 4 27 December, 1975 - Through approximately December of 1976,  
 5 Detective Songer continues the investiga-  
 6 tion of the Barbara Ann Derry homicide  
 7 recontacting associates and suspects.
- 8 22 March, 1976 - Progress report is received from Western  
 9 State Hospital regarding Warren Leslie  
 Forrest.
- 10 May of 1976 - Detective Davidson continues attempts at  
 11 the identification of the unknown female  
 12 victim in Dole Valley.
- 13 11 July, 1976 - Set of bones believed to be of human origin  
 14 are found in a shallow gravesite at Tukes  
 15 Mountain, Clark County, Washington.
- 16 12 July, 1976 - Excavation of this gravesite begins.
- 17 12 July, 1976 - Interviews with Clark County Parks and  
 18 Recreation employees are initiated.
- 19 12 July, 1976 - Fred Laddusaw is again interviewed regard-  
 20 ing the disappearance of Krista Blake.
- 21 13 July, 1976 - Conference is held with the Chief Criminal  
 22 Deputy and investigators of the Clark  
 23 County Sheriff's Office regarding the  
 24 similarities with this victim currently  
 25 found and with the Countryman assault  
 26 which occurred at the same location in  
 27 July of 1974.
- 28 15 July, 1976 - These remains are identified as those of  
 29 Krista K. Blake.
- 30 14 July, 1976 - Intensified investigation into the background  
 31 of Warren L. Forrest is initiated.
- 32 14 July, 1976 - The blue van previously owned by Warren L.  
 Forrest is relocated and re-searched.
- 16 July, 1976 - Investigation into the Blake homicide  
 continues and associates of Krista K.  
 Blake are located and interviewed  
 and interviews of some of the associates  
 of Warren L. Forrest are began at this  
 time. This continues through 30 July,  
 1976.
- 25 June, 1976 - A letter is received from the Public  
 Defender's Office addressed to Detective  
 Davidson denying his request to interview  
 suspect, Warren L. Forrest.
- 26 July, 1976 - Detective John Howard recontacts a sister  
 of Jamie Grissom. No additional information