

# Heidi Lynn Brown (I)

94-11-07-498P

## EVIDENCE

### Corpus Delicti Rule

The corpus delicti rule requires, in order to obtain a criminal conviction, the State must present evidence that a crime has been committed independent of the defendant's own statements. The admissibility of evidence in administrative proceedings is governed by the Administrative Procedure Act. Under those standards and under the Washington rules of evidence, the respondent's statements are admissible. . . **Heidi Lynn Brown**, 94-11-07-498 (Pharmacy, January 17, 1995 ).

## EVIDENCE

### Exclusionary Rule

A respondent pharmacist asserted that the exclusionary rules of criminal evidence apply in Washington administrative proceedings. Disciplinary proceedings are civil in nature. Where the disciplinary proceedings involve fitness to hold a pharmacist license in the future based on past acts of unprofessional conduct, application of the rule would have little or no deterrent effect on the agency that conducted the illegal search. That deterrent purpose has been served by the exclusion of evidence and statements in the criminal action. *Citing I.N.S. v. Lopez-Mendoza*, 468 U.S. 1032 (1984). . . **Heidi Lynn Brown**, 94-11-07-498 (Pharmacy, January 17, 1995 ).