Suicide at common law was considered the felony of "self murder" because it deprived the King of one of his subjects and therefore was a crime against the Crown and against God. The punishment for suicide entailed forfeiture of the deceased person's estate and loss of the right to a formal burial. In 1961, England abolished the offense of suicide, although assisting suicide remains a crime.

In the United States, suicide in most states also no longer is considered a criminal offense. Assisting suicide, however, remains a crime. New York provides that an individual who "intentionally causes or aids another person to commit suicide" is guilty of manslaughter in the second degree (N.Y. Penal Law § 125.15).

In November 1997, the Oregon "death with dignity" law went into effect. The law provides for physician-assisted suicide (Ore. Rev. Stat. §§ 127.800, et seq). In 2006, the U.S. Supreme Court held that the federal government had no legal authority under the Controlled Substances Act (CSA) to prevent Oregon doctors from prescribing legal drugs to be used in suicide. Roughly six hundred individuals have made use of the Oregon law. See *Gonzales v. Oregon*, 546 U.S. 243 (2006).

Washington passed a similar law in 2008. Wash. Rev. Code § 70.122.070(1) provides that the withholding or withdrawal of life-sustaining treatment at a patient's request "shall not . . . constitute a suicide or a homicide." In May 2009, a sixty-six-year-old woman suffering from pancreatic cancer became the first person in Washington to make use of the law to end her life. Approximately 150 persons have made use of the law in Washington.

In both Oregon and Washington, two doctors are required to certify that a patient has six months or less to live. After receiving these separate, independent certifications, the patient is eligible to terminate his or her life. Then, the patient must request lethal drugs on two occasions, fifteen days apart. The fatal dose must be self-administered.

The Oregon and Washington laws are opposed by various religious organizations and by the American Medical Association, which believes that doctors should not be involved in assisting in the taking of human life.

In Oregon, an equal number of men and women have made use of the law, and the median age of these individuals is seventy-one years of age. Of these individuals, 81 percent were suffering from cancer. Studies determined that most of these individuals were motivated by a desire to control their fate rather than to eliminate pain. There was apprehension when the Oregon law was passed that poor individuals would be pressured into suicide because of the cost of their care. Studies, however, indicate that most people employing the law were solidly middle class.