

# ATTACHMENT 1

1. Email Correspondence from Affiant 1, July 7, 2016 (1 page)

**Vignarajah, Thiru**

---

**From:** [REDACTED]  
**Sent:** Thursday, July 07, 2016 5:11 PM  
**To:** Vignarajah, Thiru  
**Subject:** Adnan Syed

Hello.

My name is [REDACTED].

I'm not even sure if I'm contacting the right person but I'm hoping I am.

I was going to stay out of it because I didn't think Adnan would be granted a new trial based on her fabricated story but seeing as he has, I felt it was important to come forward.

Asia (McClain) Chapman's story about seeing Adnan in the library the day Hae was killed is a lie.

I very much remember, as does [REDACTED] having a conversation with Asia in our co op class about Asia saying she believed so much in Adnan innocence that she would make up a lie to prove he couldn't have done it.

Both my sister and I (more so my sister) argued with Asia about how serious this situation was. She just said that it wouldn't hurt anything-that if he was truly guilty then he would be convicted.

I'm not sure what can come of this information but I felt I had to let someone know.

Thank you for your time.

[REDACTED]

# ATTACHMENT 2

1. Affidavit of Affiant 1, August 4, 2016 (2 pages)
  - Facebook Chat, McClain & Affiant 1 (1 page)
  - Photographs of handwritten letter, 1996 (3 pages)
  - Facebook Group Chat, McClain, Affiant 1 & Affiant 2 (1 page)
  - Email Correspondence to State, July 7, 2016 (1 page)

AFFIDAVIT OF [REDACTED]

I, [REDACTED], hereby certify that I am over the age of eighteen years and am competent to testify and aver as follows:

1. I went to Woodlawn High School all four years and graduated in 1999.
2. I met Asia McClain during my freshman year at Woodlawn, and she and I became very close friends. Over the next few years we remained friends, but were not as close as we were our freshman year. We have been friends on Facebook for a while but mostly to the extent of liking one another's photos. Her last name is now Chapman.
3. Within a few days after Adnan Syed was arrested in 1999 for killing Hae Min Lee, Asia and I were in Ms. Graham's co-op class with [REDACTED] when Asia told us she believed so much in Adnan's innocence she would make up a lie to prove he couldn't have done it. This started a very heated argument between Asia and [REDACTED] that I had to step in and calm them down. At no time during this conversation and argument did Asia mention why she believed in his innocence. Though she did say she believed that he just didn't seem capable of doing something like that. She did not say that she had seen Adnan on the day the girl was killed and she did not say that she had a conversation with him in the library. She and [REDACTED] were arguing because she was saying she would make up a lie to help him and my sister was telling her how serious the situation was, that she could get into trouble, and she should not lie because a girl was dead.
4. This topic did not come up again and I assumed that Asia came to her senses and decided not to get involved.
5. Sometime in late 2014, I heard about the podcast and when I listened to a few episodes I realized Asia had gotten involved. On November 7, 2014, I messaged Asia through Facebook, and told her I did not know that she had been involved. I was trying to get a reaction from her by sending her a message and calling her out. She did not respond. My chat with Asia is included.
6. On December 28, 2014, Asia sent me pictures on Facebook of a three page letter I had written her when I was a freshman and when we were very close. Three page letter attached.
7. The next time Asia sent me a message was March 2, 2016. She sent a group message to me and [REDACTED] with a picture from what I think was our high school co-op class. Since there are other people in it I am not including that photo but I do have it. [REDACTED] Asia and I all chatted about it. This group chat is included. When I said 'Yes, Asia, we had co-op with you.' That was because I knew she knew that we were all in that class and because I know she remembers the argument we all had too.



8. I did not plan to do anything with my information because I did not ever think anyone would believe her and I did not think Adnan would get a new trial. When I heard that he got a new trial, I sent her a long message saying I hoped she could live with herself. I then blocked her.

9. I had a few sleepless nights after that thinking about whether I should come forward. My sister and I talked about it. After a few days I decided I needed to let someone know. I sent an email on July 07, 2016, to the SA handling the case. Email included.

10. I did not hear from anyone for a few days but then was contacted by a police detective on July 22, 2016.

11. I am willing to tell what I know in court if that is needed. I do think it is sad what Asia is doing.

12. I did not know Adnan or Hae. I am not doing this for any reason except because it is the right thing to do. I have spoken to my family and we ask that everyone respect our privacy. I do not want to do any interviews with anyone unless it is needed for court.

13. I am prepared to participate in any court proceedings, if necessary.

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY AND UPON PERSONAL KNOWLEDGE THAT THE CONTENTS OF THE FOREGOING PAPER ARE TRUE.

Dated: \_\_\_\_\_

8/4/2016



08/02/2014 12:12AM



If you set up a next door thru that link you will get \$25 amazon gift card. Plus group leader has its perks. Everyone knows who you are and you are in control. Plus you will be first to be notified on new members and post.

11/07/2014 10:09AM

I came across this last night after my Aunt asked me about it. Apparently she has been following the story through the series, The Serial.  
I had no idea you had been that involved all those years ago.

I'm sending you the link  
<http://serialpodcast.org/>

12/28/2014 2:29AM



Sorry it took me so long. Been so busy this holiday season and it is downstairs in my storage room



I never did forget you honey. Thanks for the good advice

JUL 1ST, 9:30AM

I was going to try to stay out of it because I seriously thought they'd be no way he would be granted a new trial but seeing as he is, I have to get this off my chest. Do you remember when you, [REDACTED] and I were taking in Mrs Graham's class about how you believed so much in his innocence that you would make up a little lie to prove he couldn't have done it? My sister and you actually starting arguing over it. I do. So does [REDACTED]. That's why he never told anyone the police or his attorney to pursue you in the investigation because he knew you were full of it he knew that never happened. Your letter to him, asking him why he never said he talked to you in the library, that was your way on getting him on board with your story. I think it's sad he may actually be set free because of you and this fabricated story. I'm not getting anymore involved besides writing this message to you but I hope if he gets set free because of your testimony, you're able to lived with that.

Chat Conversation End

Asia

June 13, 1991

I want to start out by saying I'm going to miss you alot. Who would know that by the end of the year you would be one of my closest friends. You helped me alot this year. Everytime I had a problem, I know I could count on you to be there. Thanks for being there. I also want to tell you that no matter what you think - you deserve more than anyone could ever give you. You are a very loving person and someone nice and sweet and someone that knows how to love you the way you should be loved. deserves to be with you. But I know how you feel about him, so get your life. Just be careful and try not to get your emotions mix up



might cause it hurts when you  
find out that you made a  
mistake, look at me. Like  
it always will kick my heart  
can only take breaking so  
many times after awhile it  
can't be fix anymore. Hopefully  
one day both of us will find  
someone that is loving, that  
cares and of course has to  
be a virgin (Ha, Ha) You have  
been a good friend to me,  
you never once look at me  
as [redacted] (like) so  
what I'm [redacted] and I am damn  
proud of it. But remember I'm  
a high yellow to everyone else.  
~~that's~~ Good luck in every  
thing you do in life, I know  
you ~~can~~ ~~can~~ can do anything  
you want. Much luck, and  
have fun over the summer.  
You better call me on  
my birthday [redacted]  
always remember this!  
Keep your head up high and

don't ever think your not good  
enough- because you are  
thanks for being a friend

P.S MISS YOU

Love ya like a sister  
2

P.S.S High five, so? are

P.S.S.S don't ever forget  
me- I won't forget you

P.S.S.S here my address write  
to me!

MAR 2ND, 3:38AM



Asia

Which one of you is this? You remember what class?

[REDACTED]?

State's note: Affiant 2

MAR 2ND, 11:35AM

I think that is [REDACTED] 😊  
That is Mrs. Graham right? Was it our co-op class?



Affiant 1

Pretty sure that's you, [REDACTED]. I have no idea what class that is though.

MAR 2ND, 1:05PM



Asia

I thought it might be co op

You had co op?

What period? At the start of 3rd?



Affiant 1

Yes, Asia, we had co-op with you.



Asia

Nice!

My memory is not perfect but I thought so when I saw the pic

So we had to go to 3rd period and wait to be dismissed right?

Because we had to wait for busses and the other kids to get into the cafeteria, right?



Affiant 1

Yes, that's right.



Asia

Thank God I been going crazy!

The stuff people expect me to remember



Asia

Chat Conversation End

Seen by everyone

[REDACTED]  
[REDACTED]  
Thu 7/7/2016 5:11 PM

Sent Items

To: tvignarajah@oag.state.md.us;

📌 : Wunderlist   Evernote

Hello.

My name is [REDACTED]

I'm not even sure if I'm contacting the right person but I'm hoping I am.

I was going to stay out of it because I didn't think Adnan would be granted a new trial based on her fabricated story but seeing as he has, I felt it was important to come forward.

Asia (McClain) Chapman's story about seeing Adnan in the library the day Hae was killed is a lie.

I very much remember, as does [REDACTED] having a conversation with Asia in our co op class about Asia saying she believed so much in Adnan innocence that she would make up a lie to prove he couldn't have done it. Both my sister and I (more so my sister) argued with Asia about how serious this situation was. She just said that it wouldn't hurt anything-that if he was truly guilty then he would be convicted.

I'm not sure what can come of this information but I felt I had to let someone know.

Thank you for your time.

[REDACTED]

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# ATTACHMENT 3

1. Affidavit of Affiant 2, August 4, 2016 (2 pages)
  - Facebook Group Chat, McClain, Affiant 1 & Affiant 2 (1 page)
  - Facebook Chat, McClain & Affiant 2 (1 page)



AFFIDAVIT OF [REDACTED]

I, [REDACTED], hereby certify that I am over the age of eighteen years and am competent to testify and aver as follows:

1. I attended Woodlawn High School from the fall of 1995 until my graduation in the spring of 1999. I am [REDACTED]
2. I met Asia McClain, now Asia Chapman ("Asia"), during my freshman year at Woodlawn High School. I did not know her very well but she was good friends with my sister.
3. Asia, [REDACTED] and I were all in Ms. Graham's Co-op class. We sat next to each other.
4. Shortly after Adnan Syed was arrested in 1999, she came to class and started talking about him and the case and her being convinced of Adnan's innocence. She said she would be willing to make up a story to help Adnan. I told her how serious this was and that someone had lost their life and if he was innocent she should let the evidence show that and that she shouldn't play around with something so serious. Asia never mentioned seeing Adnan in the library or said she saw him at all the day Lee went missing. The conversation got very heated and my sister had to "break up" our verbal altercation.
5. I did not know she got involved until I heard from my sister about the Serial podcast and Asia claiming to be an alibi witness. I know a little about the case through the news and I have heard about it from other people including my sister but I have not listened to the Serial podcast myself.
6. I have not gotten involved until now because I thought this was just entertainment and that no one would actually take Asia's story seriously. I remember our argument very well. In fact, she did not give any reason why she thought Adnan was innocent. We were arguing because she was saying she was going to make something up to help him and I could not believe she did not understand the seriousness of what she was saying she was going to do.
7. I have a daughter who is around the age we were when we had that conversation. Being young we can do stupid things but for her to continue with this story after all these years and being grown with families of our own; I could not stand by anymore without saying something about our conversation in Ms. Graham's co-op class.
8. My sister and I have had several conversations about the likelihood of Adnan being granted another trial based on Asia's testimony. I was sure he would not be granted a new trial. When my sister and I heard about the new trial I suggested we contact the State's Attorney handling the case and that we should tell them about the conversation in Ms. Graham's class. I then emailed my sister the information I found on Maryland Judiciary Case Search on the State Attorney handling the case. We do not want to be more involved than we have to be.

9. I will not do interviews with the media or anyone else. If I am asked to come to court I will come and tell the truth.
10. I was Facebook friends with Asia when she sent me and [REDACTED] a group photo back in March of this year. I do not know if it is me or my sister in the photo but I believe it is Ms. Graham's co-op class. Attached hereto is a copy of the group message.
11. On July 1, 2016, I received a message from Asia at 10:38 am. I missed a phone call from Asia through Facebook at 10:40 am. I have not spoken to Asia via telephone. I sent a message to Asia telling her I knew she was lying. Attached hereto is a copy of that message chat.
12. [REDACTED] told me that a detective had come to see her and I had no problems talking with him about my information.
13. The detective has told me that I am welcome to get an attorney, but I feel it is not necessary at this time.
14. I am prepared to participate in any court proceedings, if necessary.

I SOLEMLY AFFIRM UNDER THE PENALTIES OF PERJURY AND UPON PERSONAL KNOWLEDGE THAT THE CONTENTS OF THE FOREGOING PAPER ARE TRUE.

Dated: \_\_\_\_\_

8/4/16



MAR 2ND, 3:38AM

Asia

Which one of you is this? You remember what class?

MAR 2ND, 11:35AM

State's note: Affiant 2

I think that is   
That is Mrs. Graman right? Was it our co-op class?

Affiant 1

Pretty sure that's you,  I have no idea what class that is though.

MAR 2ND, 1:05PM

Asia

I thought it might be co op

You had co op?

What period? At the start of 3rd?

Affiant 1

Yes, Asia, we had co-op with you.

Asia

Nice!

My memory is not perfect but I thought so when I saw the pic

So we had to go to 3rd period and wait to be dismissed right?

Because we had to wait for busses and the other kids to get into the cafeteria, right?

Affiant 1

Yes, that's right.

Asia

Thank God I been going crazy!

The stuff people expect me to remember

Asia

Chat Conversation End

Seen by everyone

04/01/2014 6:23PM



yes april fools. i deleted your comment to fool people



08/19/2014 7:48PM



If you get some time, I'd recommend taking some extra white thread to the bathing suit buttons. One of mine came off but I was able to save it and sew it back on.

08/21/2014 12:21PM

Good! thanks for the heads up!

10/15/2014 1:25PM



#blockebola #stopthespread #limitexposure #obama #mrpresident #barackobama @barackohama

<http://chn.ge/ZEfOfE?recruiter=165882459>

JUL 1ST, 10:38 AM



Did your sister's FB acct get hacked? I got a crazy message from her that doesn't sound like her talking about me in ways that doesn't sound like me and when I tried to respond I had been blocked



Asia

**You missed a call from Asia.**

**✓ July 1st, 10:40am**

**Call Back**

No it wasn't hacked. She and I have been struggling with whether we should contact the SA who is handling the case but decided against it because we assumed there was no way in hell he would be granted a new trial. I've sat back at let you have your 15 minutes of time on behalf of that poor girl because I didn't think anyone would actually entertain you or your fabricated story about seeing him in the library. I remember that day in Mr. Graham's like it was yesterday. I remember getting into a heated argument with you about how serious the situation was and that a girl lost her life and [REDACTED] actually had to "break up" our verbal altercation. Mr. [REDACTED] and you know damn well you never saw him that library. You need to one clean, giving how young you were may play on your side but to continue with this story 17 years later and you being a grown woman with children is disgusting.



Wow...this is crazy. I'm not lyig about any of this

Ok but you really are... no need to contact me back. You obviously have decided to stick by this story.

**Chat Conversation End**

# ATTACHMENT 4

1. State's Notice of Intent to File Application for Leave to Appeal & Request to Stay Order Granting Post-Conviction Relief, July 21, 2016 (2 pages)
2. Order Staying Grant of Post-Conviction Relief (1 page)

ADNAN SYED

Petitioner

v.

STATE OF MARYLAND

Respondent

RECEIVED  
IN THE  
2016 JUL 21 PM 4:31  
CIRCUIT COURT

BALTIMORE FOR  
CRIMINAL DIVISION

BALTIMORE CITY

CASE NOS. 199103042-46

PETITION NO. 10432

\* \* \* \* \*

NOTICE OF INTENT TO FILE APPLICATION FOR LEAVE TO APPEAL  
AND REQUEST TO STAY ORDER GRANTING POST-CONVICTION RELIEF

The State of Maryland, by its attorneys, Brian E. Frosh, Attorney General of Maryland, and Thiruvendran Vignarajah, Deputy Attorney General, states its intention to file an application for leave to appeal and respectfully requests that this Court stay its order pursuant to Section 7-109(b) of the Criminal Procedure Article of the Maryland Code.

1. In February 2000, a jury convicted Petitioner Adnan Syed of the first-degree murder of Hae Min Lee, for which he was sentenced to life in prison on June 6, 2000. Petitioner's motion for a new trial, his direct appeals, and original post-conviction petition were denied.
2. While Petitioner's appeal of the denial of his post-conviction petition was pending before the Court of Special Appeals, a limited remand was ordered, and subsequently this Court granted Petitioner's motion to reopen the post-conviction proceedings and conducted a hearing in February 2016.
3. On June 30, 2016, this Court granted Petitioner's request for post-conviction relief on one of the grounds asserted by Petitioner, vacated his convictions, and granted Petitioner's request for a new trial.
4. Section 7-109(a) of the Criminal Procedure Article provides that, within 30 days, the State may apply to the Court of Special Appeals for leave to appeal a post-conviction order in these circumstances.<sup>1</sup>
5. The State of Maryland states its intention to file an application for leave to appeal and now respectfully requests, pursuant to Section 7-109(b), that this Court stay its order vacating

---

<sup>1</sup> Because 30 days from June 30, 2016, falls on a Saturday (July 30, 2016), the State is required to file its application for leave to appeal by Monday, August 1, 2016. See Md. Rule 1-203(a)(1).

Petitioner's convictions and granting Petitioner's request for a new trial, pending further resolution of these matters by the Court of Special Appeals.

WHEREFORE, in accordance with Section 7-109 of the Criminal Procedure Article of the Maryland Code, the State provides notice of its intention to file an application for leave to appeal and respectfully requests that this Court stay its order pending further resolution of these matters by the appellate courts of Maryland.

Respectfully submitted,

BRIAN E. FROSH  
ATTORNEY GENERAL

A handwritten signature in dark ink, appearing to read 'T. V.', with a long horizontal flourish extending to the right.

Thiruvendran Vignarajah  
Deputy Attorney General  
Office of the Attorney General  
200 Saint Paul Place  
Baltimore, MD 21202

ADNAN SYED

Petitioner

v.

STATE OF MARYLAND

Respondent

RECEIVED  
2016 AUG -3 AM 8:46

BALTIMORE CITY  
CRIMINAL DIVISION

IN THE

CIRCUIT COURT

FOR

BALTIMORE CITY

Case Nos.: 199103042-46

Petition No.: 10432

\* \* \* \* \*

**ORDER**

Upon consideration of the Respondent's Notice of Intent to File Application for Leave to Appeal and Request to Stay Order Granting Post-Conviction Relief pursuant to Section 7-109(b) of the Criminal Procedure Article of the Maryland Code, and no response in opposition having been filed by the Petitioner, it is this 2<sup>nd</sup> day of August, 2016, by the Circuit Court for Baltimore City,

**ORDERED** that the Respondent's Request to Stay Order Granting Post-Conviction Relief is **GRANTED**.

**TRUE COPY  
TEST**

*[Signature]*  
LAVINIA G. ALEXANDER, CLERK



MARTIN P. WELCH  
JUDGE

P97

THE JUDGE'S SIGNATURE APPEARS  
ON THE ORIGINAL DOCUMENT

cc: Court File  
The Honorable W. Michel Pierson  
C. Justin Brown, Esq., The Law Offices of C. Justin Brown  
Thiru Vignarajah, Esq., The Office of the Maryland Attorney General



# ATTACHMENT 5

1. Post-Conviction Testimony of Adnan Syed, October 25, 2012 (8 pages)
2. Billing Summary for Adnan Syed, 3/2/99 - 3/31/99 (1 page) (A-0374)
3. Billing Summary (Syed, Adnan), 4/7/99 - 6/29/99 (2 pages) (A-0369-A-0370)
4. Correspondence from Gutierrez, July 7, 1999 (3 pages) (A-0004-A-0006)
5. Amended State's Disclosure, July 8, 1999 (2 pages) (A-0007-A-0008)

# COPY

1

ADNAN SYED VS. STATE OF MARYLAND  
October 25, 2012 BEFORE JUDGE MARTIN P. WELCH

ADNAN SYED	*	IN THE
Petitioner	*	CIRCUIT COURT
V.	*	FOR
STATE OF MARYLAND	*	BALTIMORE CITY,
Respondent	*	STATE OF MARYLAND
	*	199103042-046 and
	*	Post-Conviction No. 10432

\* \* \* \* \*

TRANSCRIPT OF OFFICIAL PROCEEDINGS  
(Post-Conviction)

BEFORE: THE HONORABLE MARTIN P. WELCH, Judge

HEARING DATE: October 25, 2012

APPEARANCES:

For the Petitioner: Justin Brown, Esquire

For the Respondent: Kathleen Murphy, Esquire

Transcriptionist: Erika B. Newton

Transcription Service: ACCUSCRIBES TRANSCRIPTION SERVICE  
1301 York Road, Suite 601  
Lutherville, Maryland 21093

Proceedings recorded by digital media with video,  
transcript produced by transcription service.

ACCUSCRIBES TRANSCRIPTION SERVICES  
410-466-2033 410-494-7015

ADNAN SYED VS. STATE OF MARYLAND  
October 25, 2012 BEFORE JUDGE MARTIN P. WELCH

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Petitioner:

Adnan Syed 6 56 60 --

Margaret Meade 63 97 100 --

Respondent:

None offered.

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MARK

ID

RECD

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by MS. MURPHY 114

ACCUSCRIBES TRANSCRIPTION SERVICES

410-466-2033

410-494-7015

ADNAN SYED VS. STATE OF MARYLAND  
October 25, 2012 BEFORE JUDGE MARTIN P. WELCH

(Whereupon, Defense's  
Exhibit No. 5 was admitted  
into evidence.)

(Pause.)

THE COURT: And if I didn't say it then, this  
would be admitted then as Defendant's -- or Petitioner's  
Exhibit No. 5, I'm sorry.

MR. BROWN: Thank you, Your Honor. And with  
that taken care of, I would call Adnan Syed.

THE COURT: If you'll take the witness stand,  
please.

ADNAN SYED

(A witness produced on call by the Petitioner, first  
having been duly sworn according to law, testifies as  
follows:)

CLERK: I ask that you speak directly into the  
mic. State your name for the record.

THE WITNESS: My name is Adnan Syed.

DIRECT EXAMINATION

BY MR. BROWN:

Q Good morning, Mr. Syed.

A Good morning.

Q And, again, please make sure -- if I may  
pull that even closer to him. Well, I guess that's as  
good as it gets. Mr. Syed, where are you currently

ADNAN SYED VS. STATE OF MARYLAND  
October 25, 2012 BEFORE JUDGE MARTIN P. WELCH

1 it was very important for me to be able to recount exactly  
2 what happened that day. And, when I received these  
3 letters, it kind of fortified the memory that I had of  
4 after school that day. School ended at 2:15, that after  
5 school that day, I went to the public library. And I  
6 stayed there between approximately 2:40 to 3:00, and then  
7 I went to track practice. So, these letters essentially,  
8 they verify in my mind what my memory was of that day.

9 Q Were you surprised to receive these  
10 letters?

11 A I was surprised to received these letters.  
12 And in them, she stressed several things to me. She  
13 stressed number one, that she was very clear and concise  
14 about remembering that day. And she was very emphatic  
15 about being able to help me out. She was emphatic about,  
16 she provided me with her phone number, her, I believe, her  
17 mother or her grandmother's phone number. She requested  
18 me to ask my attorney to contact her, so that she could  
19 come forward with this information. And, I mean, she --  
20 and, I guess, what surprised me in a sense was that, she  
21 wrote me back to back. And she told me that she also took  
22 it upon herself to visit my family and she spoke to my  
23 mother. And, you know, she expressed these things to my  
24 mother. So, yeah.

25 Q And all that's in those letters?

ADNAN SYED VS. STATE OF MARYLAND  
October 25, 2012 BEFORE JUDGE MARTIN P. WELCH

1 A All of this contained in these letters.

2 Q If I could turn your attention to Exhibit  
3 No. 6, is there a mention of someone named, Justin Adger?

4 A Oh, yes, sir. There is.

5 Q Is that the same Justin Adger who you  
6 mentioned before in your testimony?

7 A Yes.

8 Q And, again, who is Justin Adger?

9 A He was a friend of mine, that I had known  
10 since middle school.

11 Q And just to be absolutely clear, did those  
12 letters come to you before the trial or after the trial?

13 A I received these letters within the first  
14 week of being arrested. So that was way prior before the  
15 trial.

16 Q And did you solicit these letters in any  
17 way?

18 A Not at all.

19 Q Is what she said, in these letters about  
20 January 13th true?

21 A I -- it's absolutely true. She -- one of  
22 the things that really stuck out in my mind, was that she  
23 stated that she spoke to the librarian who stated that  
24 they had security cameras. And one of the things that she  
25 mentioned was that, that's something that we should look

ADNAN SYED VS. STATE OF MARYLAND  
October 25, 2012 BEFORE JUDGE MARTIN P. WELCH

1 at, trying to secure those or retrieve the security camera

2 Q Tell me, and not what these letters say,  
3 but tell me what your own recollection is from that date  
4 of January 13th, with regard to Asia McClane?

5 A I would say my -- well, my recollection is  
6 --

7 THE COURT: And, I'm sorry, January 13th is the  
8 date of the letter or?

9 MR. BROWN: Your Honor, that's the date when Ms.  
10 McClane ran into Mr. Syed at the library. It's the date  
11 when the murder took place.

12 THE COURT: Okay.

13 THE WITNESS: I was in the library and Asia  
14 McClane, she came over and there were two other guys with  
15 her. And she introduced them as her boyfriend and her  
16 boyfriend's best friend. So, we sat, and we talked for a  
17 little while about different things, like, college and  
18 what's going on in high school. You know, things like  
19 that. And, I would say the two things particularly that  
20 really stuck out in my mind, and she did mention them --  
21 excuse me, she did mention them -- excuse me. The one  
22 thing that stuck out in mind was the fact that, there were  
23 two snow days immediately after this day. And she  
24 mentioned that in the letter. And, so, that would be  
25 January 14th and 15th. We didn't have school those two

ADNAN SYED VS. STATE OF MARYLAND  
October 25, 2012 BEFORE JUDGE MARTIN P. WELCH

1 days. And that stuck out in my mind was because, when I  
2 met her boyfriend, I had put in my head that, well, when I  
3 see Justin tomorrow in school, you know, I'm just going to  
4 let him know, you know, I met Asia's boyfriend. He seemed  
5 like a pretty nice guy. 'Cause I just felt like that was  
6 something, you know, he -- you know, he may want to know.  
7 But I didn't have a chance to tell him this until the  
8 following Monday because we had two snow days.

9 Q Do you recall what you were doing at the  
10 library at that time?

11 A I'm fairly certain that I was accessing my  
12 e-mail from the library.

13 Q Okay. And why, why had you not told anyone  
14 this before about the library?

15 A Well, prior to me being arrested, I had  
16 absolutely no idea that I would need to -- have to recount  
17 every single aspect of my day that day. I didn't know  
18 that I was going to be charged with her murder. I had  
19 absolutely nothing to do with her murder. So, up until  
20 the day I was arrested, in my conversations with the  
21 detectives or with anyone for that matter, I never went  
22 into great extent or felt the need to, because I didn't  
23 believe I needed to provide an alibi. I didn't know that  
24 I was going to be charged with her murder.

25 Q And is it correct that, to the best of your



ADNAN SYED VS. STATE OF MARYLAND  
October 25, 2012 BEFORE JUDGE MARTIN P. WELCH

1 recollection, the victim's body was not found until nearly  
2 a month later, after this date, this January 13th date?

3 A I believe it was February 9th, 1999.

4 Q And is it correct that you were arrested on  
5 February 28th, 1999?

6 A Yes.

7 Q And after receiving the letters from Ms.  
8 McClane, did you notify Cristina Gutierrez?

9 A I immediately notified her.

10 Q How did you notify her?

11 A Well, it would have been, the next time  
12 that I saw her on a visit, I showed her the two letters  
13 and she read them. And I asked her, could she please do  
14 two things, contact Asia McClane, and try to go to the  
15 library to retrieve whatever security footage was there.

16 Q And do you recall whether this conversation  
17 with Ms. Gutierrez took place prior to the start of the  
18 trial?

19 A It took place very much prior to the start  
20 of the first trial.

21 Q Do you -- we mentioned this name before.  
22 I'm gong to run it by you again, Ali Cornedor. Do you  
23 recall who he was?

24 A Yes. He was one of Ms. Gutierrez's law --  
25 I don't know. He was a lawyer, I think. So, I don't know

**Billing Summary for Adnan Syed**

The following is a summary of the man-hours and miles used to investigate this case while Attorneys Doug Colbert and Chris Flohr were Adnan's council.

Total Hours: 39.75 Total Miles: 582

1. 3-2-99 3.0 hours 62 miles-First meeting
2. 3-3-99 1.75 hours 18 miles – met with attorneys and met Mr. Syed
3. 3-3-99 4.0 hours 41 miles – drove the area of Woodlawn High and Leakin Park, Balt. Co. Library, interviewed Wackenhut Off. Steven Mills, interviewed Coach Michael Sye
4. 3-4-99 6.0 hours 49 miles-met and interviewed Adnan
5. 3-8-99 3.5 hours 104 miles- phone conversation with Mr. Flohr and interview with Nisha Tanna
6. 3-10-99 5.50 hours 85 miles – interviewed Stephanie McPherson and Yaser Ali, responded to Adult Boutique and picked up phone list
7. 3-11-99 2.50 hours 41 miles- Woodlawn Sr. High for Memorial Service and re-interviewed Steph
8. 3-15-99 .50 hours phone conversation with cell phone company
9. 3-16-99 5.0 hours 82 miles – met with Mr. Colbert, Lens Crafters interview, Saad Chaudry interview
10. 3-22-99 3.0 hours 39miles- Rebecca Walker interview
11. 3-23-99 2.0 hours 22 miles- Mr. Flohr meeting and re-visit Boutique
12. 3-30-99 .50 hours – conversation with Becky Walker about letter for Bail Review
13. 3-31-99 1.5 hours 39 miles- picked up letter and met with Attorneys about Bail Review

SYED, ADNAN

07/08/99

11373

State v. Adnan Syed  
 Our File: 5540-1402

DRAFT STATEMENT

04/07/99	MM Meeting with community leadership; Travel to and from.	2.00	300.00
04/19/99	MM Initial file review and set up; draft letters and memorandum re: bail transcript; authorization; investigation, and arraignment.	.50	75.00
04/21/99	MM Telephone conference with Blilal Ahmed re: visits and next steps; meeting with Drew Davis re: investigation and next steps.	.80	120.00
05/03/99	MM Meeting with MCG re: bail and investigation; telephone conference with Drew Davis re: same; roundtrip travel; client meeting.	2.90	435.00
05/04/99	MM Meeting with MCG re: status; telephone conference with Bilahl Ahmed; telephone conference with Doug Culbert.	.50	75.00
05/12/99	MM Case planning and preparation meeting with MCG; draft correspondence to Rhamand and Judge Mitchell.	2.00	300.00
05/17/99	MM Telephone conference with Rhamens re: Monday night meeting.	.20	30.00
05/18/99	MM Jail visit with defendant.	.50	75.00

(Continued)

SYED, ADNAN

07/08/99

11373

State v. Adnan Syed  
 Our File: 5540-1402

05/19/99

MM Telephone conference with Syed Rhamen re: meeting  
 and Court of Special Appeals. .30 45.00

06/02/99

MCG Preparation for arraignment; Bail hearing;  
 Meeting to disqualify. 3.50 875.00

06/03/99

MCG Arraignment at Baltimore City Circuit Court - Pt.  
 14. 3.75 937.50

06/08/99

MCG Conference with Mike Milleremann re: Disqualify  
 issue.

06/16/99

MM Receipt and review of motion to extend time to  
 file discovery; telephone conference with MCG re:  
 same. .30 45.00

06/21/99

MM Edit opposition to state Motion to Extend  
 discovery. .30 45.00

06/29/99

MM Edit Motion to Compel and Motion for Production  
 of tangible evidence before trial. .50 75.00

TOTAL SERVICES:

18.05 3,432.50

## ATTORNEY SUMMARY

Attorney	Hours	Hourly Rate	Total
Cristina Gutierrez	7.25	\$250.00	\$1,812.50
Mark Martin	10.80	150.00	1,620.00

Postage	13.09
Long Distance Telephone	0.08
Photocopying	115.80
Facsimile	11.80

**REDMOND, BURGIN & GUTIERREZ, P.A.**

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RITA FAZIOCKAS  
JEFFREY P. SCHOMIG

PRINCE GEORGE'S COUNTY OFFICE  
14746 MAIN STREET  
UPPER MARLBORO, MARYLAND 20772  
(301) 952-1555  
  
M. CRISTINA GUTIERREZ

\* Also admitted in the District of Columbia  
\*\* Also admitted in New York

July 7, 1999

via FACSIMILE

**CORRECTED ORIGINAL**

The Honorable William D. Quarles  
Circuit Court for Baltimore City  
Mitchell Courthouse  
100 N. Calvert Street  
Baltimore, MD, 21202

Re: *State v. Adnan Syed*

Dear Judge Quarles:

Pursuant to your instruction at the motions hearing in the above referenced matter on July 2, 1999, I have reviewed the discovery materials provided by the State. The materials provided by Assistant State's Attorney Kevin Urick are deficient in several respects. The following documents were missing and/or not legible as produced by the State:

1. Any and all sketches, diagrams, and photographs of the crime scene, to include the victim as well as any evidence collected.
2. A legible crime scene log. The log provided was cut-off.
3. An evidence log from the crime scene which lists all evidence collected, by whom it was collected, a complete chain of custody list for each piece of evidence, an indication of who, if anyone, performed any analysis testing, etc., an indication of what, if any, analysis or testing was performed, all documents, photographs, and reports regarding each piece of evidence, whether by police officers, testing personnel, or others, and an identification of the custody, location and condition of each and every piece of evidence observed.
4. An evidence log on the alleged victim's car indicating how, when and where car was located, when the car last seen, a listing of all evidence collected, by whom collected, an identification of who, if anyone, performed any analysis testing, etc., an identification of what, if any, analysis or testing was performed, all documents, photographs, and reports, concerning

The Honorable William D. Quarles  
Circuit Court for Baltimore City  
July 7, 1999  
Page 2

each piece of evidence, whether written by police officers, testing personnel or others, an identification of the custody, location, and condition of each and every piece of evidence observed and collected.

5. An evidence log on the defendant's car indicating how, when and where car was located, and seized, a listing of all evidence collected, by whom collected, an identification of who, if anyone, performed any analysis testing, etc., an identification of what, if any, analysis or testing was performed, all documents, photographs, and reports, concerning each piece of evidence, whether written by police officers, testing personnel or others, and an identification of the custody, location, and condition of each and every piece of evidence observed and collected.

6. An evidence log on the search of defendant's home and a listing of all evidence collected, by whom collected, an identification of who, if anyone, performed any analysis testing, etc., an identification of what, if any, analysis or testing was performed, all documents, photographs, and reports, concerning each piece of evidence, whether written by police officers, testing personnel or others, and an identification of the custody, location, and condition of each and every piece of evidence observed and collected.

7. All police reports, only incomplete reports were provided.

8. A copy of Det. Bradshaw's follow-up investigation report. The report in the materials provided is cut-off.

9. A copy of the latent fingerprint report for the hockey and lacrosse sticks submitted by Det. Macgillivray. (Property # 99009003). The report as received by the defense is cut-off.

8. Fingerprint results for any other pieces of evidence that were tested in connection with this case.

9. A full copy of all Laboratory Continuation Sheets. The sheets received are illegible and/or cut-off.

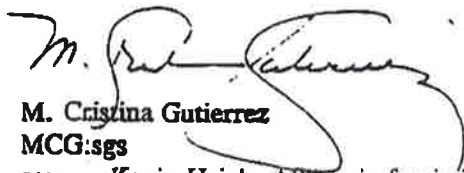
10. A copy of any statements made by Jay Wilds as an unindicted co-conspirator or co-defendant.

The Honorable William D. Quarles  
Circuit Court for Baltimore City  
July 7, 1999  
Page 3

11. A copy of any report or documents prepared by Dr. Rodriguez, the forensic scientist at the crime scene.
12. The missing persons investigatory file, including all reports, photographs taken, witness interviews, etc., specifically, information regarding when and where alleged victim was last seen.
13. A complete witness list. It is clear from the material that numerous forensic witnesses will be called regarding numerous items of evidence listed. No expert witnesses are listed in the witness list.
14. Autopsy photographs. The photocopies provided are not legible.
15. All information regarding when alleged victim was killed. Defendant can't possibly mount a defense or determine if an alibi disclosure is needed without being on notice of the alleged time of death.
16. The Medical Examiner's log with any and all notes made by any personnel concerning the collection of the body.
17. All oral reports from any expert.
18. A list of Evidence for use at trial or any tangible thing the state intends to use.
19. A list of Defendant's property seized at any time or obtained.

The defense respectfully requests that the above mentioned documents be turned over immediately.

Sincerely,



M. Cristina Gutierrez  
MCG:sgs

cc: Kevin Urick, ASA, via facsimile (410.727.5437  
syed.1285t.5540.1402

State of Maryland

CRIMINAL DIVISION

In The

vs.

1999 JUL -8\* P 12: 38

Circuit Court

Adnan Syed

CIRCUIT COURT  
BALTIMORE CITY

Of

#199103042-46

Baltimore City

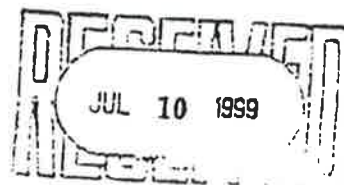
\* \* \* \* \*

### Amended State's Disclosure

NOW come Patricia C. Jessamy, State's Attorney for Baltimore City, and Kevin Urick, Assistant State's Attorney, and in accordance with provisions of Rule 4-263(h) of the Maryland Rules of Procedure hereby promptly supplement the State's prior disclosure with the following additional witnesses and/or information:

In response to the July 7, 1999, Discovery Letter sent to Judge Quarles, the State provides the following:

1. Copies of all currently available sketches are attached; upon reasonable request the State will allow the defense to examine any or all crime scene photographs available;
2. This information has already been provided;
3. The State has requested an updated list of all evidence submitted to ECU. As soon as that list is available, it will be forwarded to the defense. As the State reviews the file, if any further discoverable information on this topic is found, it will be forwarded to the defense;
4. See number 3.
5. See number 3.
6. See number 3.
7. The complete offense report currently available has been provided to the defense.
8. This material has already been provided.

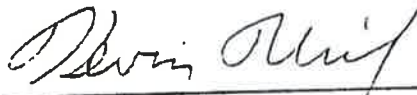




9. This material has already been provided.
10. There is no unindicted co-conspirator or co-defendant.
11. Dr. Rodriguez has written no reports in this matter.
12. A copy of this material is attached.
13. As was noted in the State's original discovery, the State intends to call as witnesses any person mentioned in or on any of the reports provided to the defense.
14. The State has faxed a letter to the Office of the Chief Medical Examiner authorizing them to release a copy of the autopsy and or autopsy photographs to the defense. A copy of the letter is attached.
15. To the best of the State's information, the victim was murdered the afternoon of the day she was reported missing, shortly after she would have left school for the day, January 13, 1999. If further investigation narrows the time down, the State will provide that more specific time to the defense.
16. The State will check to see if there is any further discoverable material in this area.
17. Summaries of oral reports from experts will be provided as they become available.
18. See number 3 above.
19. See number 3 above.

And the State provides the further:

20. A copy of the advisement of rights signed by the defendant.

  
\_\_\_\_\_  
ASA Kevin Urick

# ATTACHMENT 6

1. Handwritten Letter from Asia McClain, dated March 1, 1999 (2 pages)

it's late.

I just came from your house an hour ago. March 1, 1999

Dear Adnan, (hope I sp. it right)

I know that you can't visiters,  
so I decided to write you a letter.  
I'm not sure if you remember  
talking to me in the library on  
Jan. 13<sup>th</sup>, but I remembered  
chatting with you ~~for~~ Throughout  
your actions that day I have  
reason to believe in your innocence.  
I went to your family's house  
and discussed your "calm" manner  
towards them. I also called the  
Woodlawn Public Library and found  
that they have a surveillance system  
inside the building. Depending on  
the amount of time you spend in the  
library that afternoon, it might help  
in your defense. I really would  
appreciate it if you would contact  
me between 1:00pm - 4pm or  
8:45pm - until... My number is  
(410) 486-7655. More importantly  
I'm trying to reach your lawyer  
to schedule a possible meeting with the  
three of us. We aren't really close  
friends, but I want you to look into my  
eyes and tell me of your innocence. If  
I ever find otherwise I will hunt you  
down and wip your ass, ak - friend...!!

EXHIBIT

4

I hope that you're not guilty and  
~~I want~~ I hope to death that you have  
nothing to do with it. If so I will  
try my best to help you account  
for some of your unwitnessed, unaccountable  
lost time (2:15 - 8:00; Jan 13th)

The police have not been notified Yet  
to my knowledge maybe it will give  
your side of the story a particle  
head start. I hope that you  
appreciate this, seeing as though  
I really would like to stay out  
of this whole thing. Thank

Justin, he gave me a little  
more faith in you, through his  
friendship and faith. I'll pray  
for you and that the "REAL TRUTH"  
comes out in the end.

"I hope it will set you free" only trying to help

Asia McClain

~~\*~~ P.S. If necessary my grandparents  
line number is 653-2957. Do not call  
that line after 11:00. O.K.

Like I told Justin if you're innocent  
I do my best to help you.  
But if you're not only God can help you.

If you were in the library for  
awhile, tell the police and I'll  
continue to tell what I know  
even kinder than I am. My boyfriend and  
his best friend remember seeing you there too.

Your Amiga

Asia McClain

# ATTACHMENT 7

1. Typed Letter from Asia McClain, dated March 2, 1999 (3 pages) (Def. Ex. 6)
2. Handwritten Flohr Note to File, March 6, 1999 (1 page) (A-0531)
3. Defense Memo to Gutierrez, August 21, 1999 (3 pages) (A-0150-A-0152)
4. Detective Notes, Ju'uan Gordon Interview, April 9, 1999 (1 page) (B-0133)
5. Affidavit of Ju'uan Gordon, February 7, 2016 (2 pages) (PC2-60)
6. Attorney Notes to File, Updated August 4, 1999 (1 page) (A-0145)
7. Documents Related to Search Warrants
  - Documents Related to Search Warrant (Vehicle), March 9, 1999 (B-0076-B-0077, B-0117, B-0120-B-0122) (6 pages)
  - Documents Related to Search Warrant (Residence), March 20, 1999 (B-0123-B-0127) (5 pages)
  - Documents Related to Search Warrant (Vehicle), March 25, 1999 (B-0087, B-0115-B-0116, B-0118-B-0119) (5 pages)
  - Documents Related to Search Warrant (Syed's Person), March 25, 1999 (B-0086, B-0112) (2 pages)

Adnon Syed #992005477

301 East Eager Street  
Baltimore, MD. 21202

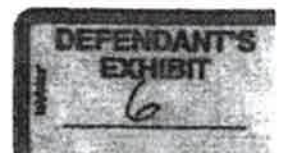
Dear Adnon,

How is everything? I know that we haven't been best friends in the past, however I believe in your innocence. I know that central booking is probably not the best place to make friends, so I'll attempt to be the best friend possible. I hope that nobody has attempted to harm you (not that they will). Just remember that if someone says something to you, that their just f\*\*king with your emotions. I know that my first letter was probably a little harsh, but I just wanted you to know where I stode in this entire issue (on the centerline). I don't know you very well, however I didn't know Hae very well. The information that I know about you being in the library could helpful, unimportant or unhelpful to your case. I've been think a few things lately, that I wanted to ask you:

1. Why haven't you told anyone about talking to me in the library? Did you think it was unimportant, you didn't think that I would remember? Or did you just totally forget yourself?
2. How long did you stay in the library that day? Your family will probably try to obtain the library's surveillance tape.
3. Where exactly did you do and go that day? What is the so-called evidence that my statement is up against? And who are these WITNESSES?

Anyway, everything in school is somewhat the same. The ignorant (and some underclassmen) think that you're guilty, while others (mostly those that know you) think you're innocent. I talked to Emron today, he looked like crap. He's upset, most of your "CRUCHES" are. We love you, I guess that inside I know that you're innocent too. It's just that the so-called evidence looks very negative. However I'm positive that

March 2, 1999





everything will work out in favor of the truth. The main thing that I'm worried about is that the real killers are probably somewhere laughing at the police and the news, that makes me sick!! I hope this letter and the ones that follow ease you days a little. I guess if I didn't believe in your innocence, that I wouldn't write to you . ☺

The other day (Monday) We (some of Mr. Parker's class) were talking about it and Mrs. Shab over-heard us; she said, "Don't you think the police have considered everything, they wouldn't just lock him up unless they had "REAL" evidence." We just looked at her, then continued our conversations. Mr. Parker seems un-opinionated, yet he seemed happy when I told him that I spoke to you family about the matter ( I told him) Your brothers are nice, I don't think I met your mother, I think I met you dad; does he have a big gray beard. They gave me and Justin soda and cake. There was a whole bunch of people at you house, I didn't know who they were. I also didn't know that Muslims take their shoes off in the house...thank God they didn't make me take mine off, my stinky feet probably would have knocked everyone out cold.



I over-heard Will and Anthony talking about you, they don't think you did "TT" either. I guess most people don't. Justin's mom is worried about you too. She gave me your home number, when Justin was in school. Classes are boring, that's one benefit to being "there", no school!!

They issued a school newsletter on the issue, so everyone is probably aware. It didn't say your name, but between that, gossip and the news, your name is known. I'm sorry this had to happen to you. Look at the bright side when you come back, won't nobody f\*\*k with you and at least you'll know who your real friends and new friends should be. Also, you're the most popular guy in school. Shoot...you might get prom king.



You'll be happy to know that the gossip is dead for your associates, it's starting to get old. Your real friends are concentrated on you and your defense. I want you to know that I'm missing the instructions of Mrs. Ogle's CIP class, writing this letter.

It's weird, since I realized that I saw you in the public library that day, you've been on my mind. The conversation that we had, has been on my mind. Everything was cool that day, maybe if I would have stayed with you or something this entire situation could have been avoided. Did you cut school that day? Someone told me that you cut school to play video games at someone's house. Is that what you told the police? This entire case puzzles me, you see I have an analytical mind. I want to be a criminal psychologist for the FBI one day. I don't understand how it took the police three weeks to find Hae's car, if it was found in the same park. I don't understand how you would even know about Leakin Park or how the police expect you to follow Hae in your car, kill her and take her car to Leakin Park, dig a grave and find you way back home. As well how come you don't have any markings on your body from Hae's struggle. I know that if I was her, I would have struggled. I guess that's where the SO-CALLED witnesses. White girl Stacie just mentioned that she thinks you did it. Something about your fibers on Hae's body...something like that (evidence). I don't mean to make you upset talking about it...if I am. I just thought that maybe you should know. Anyway I have to go to third period. I'll write you again. Maybe tomorrow.

Hope this letter brightens your day... Your Friend,

Asia R. McClain

P.S: Your brother said that he going to tell you to maybe call me, it's not necessary, save the phone call for your family. You could attempt to write back though. So I can tell everyone how you're doing (and so I'll know too).

Asia R. McClain  
6603 Marott Drive  
Baltimore, MD 21207

Apparently a whole bunch of girl were crying for you at the jail...Big Playa Playa (ha ha ha he he he).

March 2, 1999



29  
5/10  
19

TO: File, Syed  
From: Plohr  
RE: Spelling w/O  
DATE: 3-6-99

- Glasses
- Ltd resources & envelopes
- Charges/legal research.

→ Self-addressed stamped & 1 piece paper  
~~Addr of jail - writing letters + how mail scrutinized~~  
~~Releases signed~~  
~~Nisha~~

History of Hae  
~~School records / guidance counselor~~  
DOB chg. doc. typed v. handwritten

Memorial service on 11th @ Woodlan HS. plant tree & suppress  
to be 1st person

About 2-3 wks after initial disappearance, Ms. Struckey warned  
O to be careful, will be asked ques, think bt speak, took to see  
principal who gave similar advice + said PO should come here  
and I will volunteer to stay w/

Senior yr. guidance counselor, 1st gives GPT + then works w/ college  
staff. Ms. Struckey = guidance counselor. When O broke up,  
O didn't do his Eng assignment. Eng teacher told Ms. Struckey  
+ Ms. Struckey went to O + said relationship's happen, its ok.

O would write letters about tea from his mom saying he  
had a doc appt. (mom knew these forged documents)

## MEMORANDUM

TO: MCG

FROM: ALI

DATE: AUGUST 21, 1999

RE: INTERVIEW WITH ADNAN'S BROTHER, ALI

Stephanie  
Hussain  
Juman

These are the questions asked and answered during the interview:

1. Why did Jay hang out with Adnan and his friends considering that he was a couple of years older? Everyone in the area just hangs out together regardless of age. But Jay usually hung out with the Indian kids.
2. Was Leakin Park a hang out for everyone/anyone? No, people did not hang out in Leakin Park, it was considered to be dangerous.
3. Did anyone use Leakin Park as a place to go hook up? Did Adnan use it for that purpose? No, no one used Leakin Park to hook up, including Adnan. Adnan used to hook up in Aziz Syed's house (no relation). Aziz was known as the trouble maker. Aziz was one of Jay's good friends.
4. How friendly were Adnan and Stephanie? They had been friends since second grade. They were close friends. They would talk often, and for long periods of time.
5. What does Stephanie have to say about this whole situation? Stephanie was telling people that Adnan had actually committed the murder. This being based on the fact that Jay had told Stephanie that he helped Adnan bury the body.
6. Has anyone else made similar comments as to what Jay said about helping bury the body? Yes, Tayib Hussain. Tayib is 20 years old and attends the University of Maryland at College Park. Tayib asked Jay about the incident, and Jay said that he helped Adnan bury the body. Jay told Tayib that Adnan had called Jay the day before asking for his help in the murder. Jay said his reply to Adnan was that he would not help in the killing of Hae, but he would help Adnan bury the body. Jay further went on to tell Tayib that he met Adnan on the day of the incident at a gas station where Adnan showed Jay the body.
7. Is there anyone else we could speak to in relation to Adnan and what he did regularly? Ask Juwan Gordan. This is Adnan's best friend outside of the muslim community. Juwan would know more, especially about the hook ups.

Tayib

Lorne  
Nelson

Part 11/10/05

8. What does Jay do outside of hanging out with everyone else, since he has left Woodlawn? Jay works full time at a pornography store.
9. Was that the only job he had? Only source of income? Jay was the main supplier of marijuana to that group, Adnan's group.
10. Did Adnan smoke with anyone else? Adnan also used to smoke weed with his Loyola College friends, specifically Shahid Kaan. The alcohol drinking was mostly done with his mosque friends.

YUSUF KHAWAJA- SPEAK WITH HIM, HE SHOULD KNOW A LOT

11. How long has Adnan been smoking and drinking? Smoking do not know, but the first time Adnan drank was this past New Year's eve, 1998. Adnan has been smoking longer than he has been drinking.

CHECK OUT 1801 BELMONT AVE. IT IS EITHER A HOLIDAY INN OR BELMONT WEST. THIS IS WHERE THEY USED TO GO TO HOOK UP, DRINK, AND/OR SMOKE.

12. Were Jay and Adnan friendly? They were friends, but not good friends.
13. How did Jay and Stephanie become friendly? They had met when Jay used to go to Woodlawn. They were an odd couple because Stephanie more out going and popular, and Jay was more introverted and more of a "geek."
14. How much do you know about Adnan, his friends and habits? We did not talk much. We were two completely different people.
15. Did you ever give Adnan advice about girls, girlfriends, and more specifically Hae? No, not really. Adnan would usually talk to his friends about it. Yusuf and Juwan told Adnan to move on after his initial break up with Hae, but he did not. Adnan believed that they could work things out.
16. Has Adnan dated anyone else besides Hae? During Hae, Adnan also dated Nisha and Anjuli
17. Who is Nisha? Do not know her last name, but her e-mail address is nisha555@aol.com. Nisha went to high school in Kensington, and will be attending George Mason University in the fall. Nisha did say that she received a call from Adnan at 3:30 from Adnan on the day of the incident.
18. Who is Anjuli? Does not know her last name. She goes to Brynmar College in Pennsylvania.
19. Does the names Carter and Hogston ring a bell? No.
20. How well do you know Jay? Jay was on probation for felony drug charges.

yes

21. How did you find out about the disappearance of Hae? Adnan did not tell us, we found out through the television.
22. When did you find out that Hae's body was found? The night the body was found, Aisha Pitman called our house and told Adnan. Adnan told Ali, and he seemed very emotional. Adnan left the house by himself at 11:30 at night and ran to Aisha's house. Adnan did not tell his parent's that he was leaving.
23. Did Adnan talk to you about Hae? No, Adnan talked to Masud Alikhan about Hae. Adnan also spoke to the school counselor about it.
24. Did you know of any problems that Hae and Adnan had? After the incident at the dance, Hae had said that she no longer wanted to deal with the family problems. (Mother actually started to dance with Adnan at the dance. At this point Adnan went home with his parents, but he got on his bike once at home and returned to the dance.)

Couple of commentaries by Ali:

1. Ali believes that the police forced Jay's hand because Jay was on probation. Jay is basically covering his ass.
2. Ali said that Adnan is a very good liar. Adnan could lie about anything, and you would not be able to tell he is not telling the truth. Adnan could be very convincing.

▲ WROTE ME A LETTER. HE CALLED YESTERDAY, BUT I WASN'T  
HOME. WROTE ▲ BACK  
HE WROTE A LETTER TO A GIRL TO  
TYPE UP WITH HIS ADDRESS ON IT  
BUT SHE GOT IT WRONG

101 EAST EAGER STREET

ASLA? 12TH GRADE

I GOT ONE, JUSTIN AGER GOT ONE  
JUSTIN WAS IN ENGLISH CLASS. THEY GREW  
UP TOGETHER. HE IS NOT MUSLIN.

SAW ▲ DRIVE CAR - HAE'S CAR- WE USED IT TO GO  
TO MARKET: FOR FOOD CLASS ONE MORNING:

BAGELS, CHOCOLATE MILK, DONUTS

SHE PICKED BOTH OF US UP FOR SCHOOL

▲ DIDN'T HAVE CAR ---

PARKING LOT:

▲ DIDN'T MENTION ANY OTHER PLACES THEY WENT.




## AFFIDAVIT



- 1 My name is Juan Gordon. I was in contact with Adnan Syed the months following his arrest.
- 2 I am aware that Adnan tried to get character letters to be used during his case. He sent me a letter asking me to draft a character letter on his behalf after his arrest.
- 3 I am aware that he reached out to others asking that they write character letters on his behalf as well.
- 4 In my interview with police on 4/9/99 I was not suggesting that Adnan or anyone else did anything deceptive. I recall telling police that Adnan talked about asking Asia to write a character letter. He may have asked her by letter (just like he did with me and Justin). I do not know if he ever sent her the letter, nor do I know if she ever received it.
- 5 I have no knowledge of Adnan asking Asia to write anything fraudulent, or with intentions of misrepresenting anything to the court. I was not in any way suggesting that ~~the police~~ in my interview with police.

I swear and attest that everything contained  
within this affidavit is, to the best of my recollection,  
true and accurate

February 7, 2016 5:05pm  
DATE/TIME

  
JAVAN

Updated 8/4/99

**ADNAN MASUD SYED - Information in file involving Jay Wilds**Request  
Report for  
Latent Print  
Comparison

BPI # 1997 957

**ATTORNEY NOTES**

On January 13, 1999 Adnan left school and went to Jay's house. Unclear about what time he was specifically there. @ 10:15 a.m. - 1:13 p.m. (was in school at 1:13 p.m. because Mrs. Stucky printed out his recommendation letter).

Jay had Adnan's car. Jay needed the car because Stephanie would not lend the car to him. Jay took Adnan's car during 3rd period.

Jay was to pick up Adnan after track practice.

Jay was jealous of Adnan and Stephanie. He saw pictures of them in wallet a couple of days before. Jay and Stephanie were a couple. Adnan and Stephanie were Prom Prince and Prom Princess 1998 - Jr. Prom 4/25/98. Adnan refers to Stephanie as "one of his boys". He was friends with Jay through Stephanie and spent time together when they wanted to "smoke up".

***\*\*Possible discrepancy as to whether Adnan stated Hae or Jay were going to pick up Adnan\*\****

On January 13, 1999, Police Officer Adcock of the Baltimore County Police Department spoke to Adnan. His report indicated Adnan advised the officer that Lee was supposed to give him a ride home after school but Adnan was running late. Adnan felt that Lee probably left after waiting a while. On February 1, 1999 Officer O'Shea questioned Adnan regarding the conversation he had on the 13th with Officer Adcock. Adnan said that the information Officer Adcock relayed that Hae was waiting for Adnan to give Adnan a ride home was incorrect because Adnan drives his own car to school.

**STATEMENT OF PROBABLE CAUSE**

Interviewed several people regarding the death of Hae Min Lee. Indicated defendant strangled victim to death and buried remains within Leakin Park. Witness anonymous until trial.

**MOTION IN LIMINE**

Unindicted accessory after the fact made statements regarding this offense. Intends to call this witness at trial.

**AFFIDAVIT IN SUPPORT OF SEARCH AND SEIZURE WARRANT - Premises**

March 15, 1999 - Det. MacGillivray and Det. Ritz interviewed witness re homicide of Hae. Witness indicated that on Jan. 13, 1999 he met Adnan at location specified by Syed. Syed was





B - 0076

**CIB - HOMICIDE**  
**POLICE DEPARTMENT**  
**BALTIMORE, MARYLAND**  
**Progress Report**

**TO:** Commanding Officer  
Homicide Unit

**FROM:** Detective Greg Macgillivray  
& Carew

**SUBJECT:** Progress Report  
Homicide Investigation

**SUSPECTS**(Name, DOB, Race, Sex, Age, Address):

Syed, Adnan Masud [REDACTED] O/ M 17	7034 Johnnycake Road

**VICTIMS**(Name, DOB, Race, Sex, Age, Address):

Lee, Hae Min [REDACTED] A/ F 18	

**OCCURRED:** 02/09/99 1400  
4400 N Franklinton  
**CC Number:** 998B05801 **Case Number:** 99H0030  
**District:** SWD **Post:** 823

On 09 March 1999 at approximately 1535 hours, your investigator along with Sgt. Kevin Forrester executed a Search and Seizure Warrant on the suspects vehicle, a 1987 Honda Accord Md. tag # 000-000.

Crime Lab Unit # 5819 Technician Peterson processed the vehicle under the direction of Salvatore Bianca and Daniel Van Gelder of the Trace Analysis Unit.

The following items were recovered and submitted into evidence:

Search Warrants and inventory list of property seized pursuant to Rule 4-601(d)(e)(g)(h)

MP/A 15-459-078



B - 0077

Investigation to continue.

**Respectfully,**

**CIB - Homicide**

-----  
**Approving Supervisor**

-----  
**Primary Investigator**

B-0117

CIRCUIT COURT OR DISTRICT COURT OF MARYLAND  
DISTRICT 1 - BALTIMORE CITY

Application for Search  
& Seizure Warrant  
Form 94/188a

To the Honorable Judge \_\_\_\_\_ of the \_\_\_\_\_

the undersigned being duly sworn deposes and says that he (they) has (have) reason to believe

(in the vehicle) 1987 Honda Accord 4-DOOR SEDAN TAN IN COLOR Maryland Registration  
FHW 202 V.I.N.# 1HGCA5632KAO46588. REGISTERED IN THE NAME OF SYED MASUDUR RAHMAN 7034  
JOHNNYCAKE ROAD 21244.

in the City of Baltimore there is now being concealed certain property, namely;

SOIL, TRACE EVIDENCE SUCH AS BLOOD, FIBERS, HAIR, AND ANY DOCUMENTS INVOLVING THE  
RELATIONSHIP BETWEEN HAE MIN LEE AND ADNAN SYED, ANY OTHER ITEMS RELATED TO THE CRIME OF

HOMICIDE.

which is (are)

In violation of the Laws of Maryland)

pertaining to

(evidence relating to the commission of a crime)

FIRST DEGREE MURDER ARTICLE 27 - SECTION 407.

AND that the facts tending to establish grounds for issuance of Search Warrant are set forth  
in the Affidavit(s) attached thereto and made a part thereof.

WHEREFORE your Affiant(s) pray(s) that a Search & Seizure Warrant be issued for said

1987 HONDA ACCORD MD. TAG # FHW 202

Signature of Affiant

Rank or Title

SWORN to before me and subscribed to in my presence this \_\_\_\_\_ day of \_\_\_\_\_

\_\_\_\_\_  
Judge

This is an affidavit in support of a Search and Seizure Warrant for the below  
ed vehicle: 1987 Honda Accord four door sedan tan in color Maryland Registration FHW 202  
.N. # 1HGA5632HAA046588. REGISTERED IN THE NAME OF SYED MASUDUR RAHMAN 7034 JOHNNYCAKE ROAD

EVIDENCE SOUGHT: ANY TRACE EVIDENCE TO INCLUDE BLOOD, HAIR, SOIL, FIBERS, ANY  
UMENTS SHOWING THE RELATIONSHIP BETWEEN ADNAN SYED AND HAE MIN LEE, ANY OTHER ITEMS  
TAINING TO THE CRIME OF MURDER

Which is evidence relating to the commission of a crime pertaining to First  
ree Murder - Article 27 Section 407.

Your Affiant, Detective Police Agent Gregory S. MacGillivray, has been a duly  
rn member of the Baltimore City Police Department January, 1984. Your Affiant was assigned  
the Homicide Unit in January, 1995. Your Affiant has received numerous hours of  
cialized training of all facets in the field of death investigations.

Since being assigned to the Homicide Unit, your Affiant has been directly  
olved in approximately 25 homicide investigations which have occurred in Baltimore City  
ce of Maryland. During your Affiant's tenure with the Baltimore City Police Department,  
has written numerous Search and Seizure Warrants, and several warrants for evidence  
taining to the crime of murder. Your Affiant has testified at Federal Court, District and  
cuit Court levels as an expert in the field of homicide investigations.

On 09 February 1999, at approximately 2pm., the Baltimore City Police Department  
ponded to the 4400 block N. Franklinton Road, for a body that had been discovered by a  
erby.

Members of the Armed Services Medical Examiners Office responded and disinterred  
remains. A post mortem examination was conducted by the Office Chief Medical Examiner.  
he conclusion of the examination, Doctor Korrel Deputy Chief Medical Examiner, ruled the  
ner of death a homicide. Subsequently, the victim was identified as Hae Min Lee F/A/17,  
had been reported missing by Baltimore County Police on 13 January 1999.

On 27 February 1999, your Affiant along with Detective William F. Ritz had the  
asion to interview a witness to this offense at the offices of homicide. This witness  
icated that on 13 January 1999, the witness, met Adnan Syed at Edmondson and Franklinton  
d in Syed's auto. Syed, who was driving the victim's auto, opened the victim's trunk and  
ved the witness the victims body, which had been strangled.

This witness, then follows Syed in Syed's auto, Syed driving the victim's auto  
eakin Park, where Syed buries the victim in a shallow grave. Subsequently, this witness  
n follows Syed, who is still driving the victim's auto, to a location where Syed parks  
victim's automobile. Syed then gets into his car and drives the witness to a location in  
more County where the digging tools are discarded in a dumpster.

On 28 February 1999, your Affiant obtained an arrest warrant for Adnan Syed  
'17 7034 Johnnycake Road for First Degree Murder. Subsequently, Syed was arrested and

charged with warrant # 5B00351587 and transported to C.B.I.F. for processing.

B-0121

Therefore, based on the totality of the circumstances, your Affiant believes that probable cause exists for the issuance of a search and seizure warrant, for the above vehicle which would allow your Affiant, with the proper and necessary assistance, to search the vehicle for blood, soil, hair, fibers, documents showing the relationship between Adnan Syed and Hae Min Lee, and any other evidence relating to the murder of Hae Min Lee.

---

AFFIANT

SWORN TO AND SUBSCRIBED TO BEFORE ME THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 1999

---

JUDGE

## RETURN

I received the attached Search Warrant 3/9 19 98

and have executed it as follows:

On 3/9 19 99 at 3:05 o'clock P M

(the person)

I searched (the premises) described in the warrant and I left a copy of the warrant (the vehicle)

containing the inventory with 1987 Honda Accord  
Name of person searched or owner "at location of search"

FWW 202

The following is an inventory of property taken pursuant to the warrant:

SOIL	NOTEBOOK PAD	RECEIPT FOR CAR WASH
LEAVES	1 - GLOVE	PHOTO'S
CARPET FROM TRUNK	1 - TENNIS SHOE	FLOPPY DISK
COMPOSITION BOOK	PLANNER	POLO - JEANS
T-SHIRT	MOVING CITATION	HALF GLOVE

This inventory was made in the presence of Sgt. FURLESEN

and STEPHANIE PETERSON

I swear that this inventory is a true and detailed account of all property taken by me on the warrant.

ASMA  
Signature of Affiant

Subscribed, sworn to and returned before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_

Judge



Application for Search  
& Seizure Warrant  
Form 94/188a

CIRCUIT COURT OR DISTRICT COURT OF MARYLAND  
DISTRICT 1 - BALTIMORE CITY

TOLSON

To the Honorable Judge \_\_\_\_\_

the undersigned being duly sworn deposes and says that he (they) has (have) reason to believe \_\_\_\_\_ of the \_\_\_\_\_

(ON THE PREMISES KNOWN AS) 7034 JOHNNYCAKE ROAD WOODLAWN, MARYLAND 21244, A TWO STORY SPLIT FOYER SINGLE FAMILY DWELLING WITH TAN ALUMINUM SIDING AND RED BRICK, A BROWN EXTERIOR DOOR, A FREE STANDING MAIL BOX WITH THE NUMBERS 7034 AFFIXED TO SAME IN FRONT OF THE HOUSE.

in the City of Baltimore there is now being concealed certain property, namely;

ANY DOCUMENTS OR WRITINGS AUTHORED OR RECEIVED BY ADNAN SYED PERTAINING TO THE CRIME OF MURDER NOW BEING INVESTIGATED. ANY DOCUMENTS SHOWING THE RELATIONSHIP OF ADNAN SYED AND HAE MIN LEE. ANY DOCUMENTS OR WRITINGS AUTHORED BY HAE MIN LEE. ANY PERSONAL ARTICLES OF HAE MIN LEE THAT MAY HAVE BEEN TAKEN DURING THE COMMISSION OF THE MURDER NAMELY, KEYS, WALLET CREDIT CARDS, MARYLAND DRIVERS LICENSE, A.T.M. CARDS, PERSONAL PHOTOGRAPHS, TAN COLORED SHORT SLEEVE SHIRT WITH TAN AND BROWN STRIPES, BROWN HIKING TYPE BOOTS, A PAIR OF RED OR BURGUNDY GLOVES, A PORTABLE WIRELESS TELEPHONE # 443-243-9023 BLACK IN COLOR, OR ANY OTHER ARTICLES PERTAINING TO THE CRIME OF MURDER.

which is (are) \_\_\_\_\_ (In violation of the Laws of Maryland)

(evidence relating to the commission of a crime)

pertaining to \_\_\_\_\_

FIRST DEGREE MURDER ARTICLE 27 - SECTION 407.

that the facts tending to establish grounds for issuance of Search Warrant are set forth the Affidavit(s) attached thereto and made a part thereof.

BEFORE your Affiant(s) pray(s) that a Search & Seizure Warrant be issued for said

7034 JOHNNYCAKE ROAD WOODLAWN, MARYLAND 21244

Signature of Affiant \_\_\_\_\_

Rank or Title \_\_\_\_\_

W to before me and subscribed to in my presence this \_\_\_\_\_ day of \_\_\_\_\_

Judge \_\_\_\_\_

CIRCUIT COURT OR DISTRICT COURT OF MARYLAND  
DISTRICT 1 - BALTIMORE CITY

Search & Seizure Warrant  
Form 94/187a

To: Any Police Officer of Baltimore City:

Affidavit having been made before me by Gregory S. MacGillivray

Affiant - Name & Rank

said Affidavit being incorporated by reference into this warrant and made a part thereof, that he (they) has (have) reason to believe

(on the person of) \_\_\_\_\_

that (on the premises known as) 7034 Johnnycake Road Woodlawn Maryland 21244 A TWO STORY SPLIT FOYER SINGLE FAMILY DWELLING WITH TAN ALUMINUM SIDING AND RED BRICK, A BROWN EXTERIOR DOOR, A FREE STANDING MAIL BOX WITH THE NUMERALS 7034 AFFIXED TO SAME IN FRONT OF THE HOUSE.

in the City of Baltimore, there is now being concealed certain property, namely:

ANY DOCUMENTS OR WRITINGS AUTHORED OR RECEIVE BY ADNAN SYED PERTAINING TO THE CRIME OF MURDER NOW BEING INVESTIGATED. ANY DOCUMENTS SHOWING THE RELATIONSHIP ADNAN SYED AND HAE MIN LEE. ANY DOCUMENTS OR WRITINGS AUTHORED BY HAE MIN LEE. ANY PERSONAL ARTICLES OF HAE MIN LEE THAT MAY HAVE BEEN TAKEN DURING THE COMMISSION OF THE MURDER, NAMELY. KEYS, WALLET, CREDIT CARDS, MARYLAND DRIVERS LICENSE, A.T.M. CARDS, PERSONAL PHOTOGRAPHS, TAN COLORED SHORT SLEEVE SHIRT WITH TAN AND BROWN STRIPES, BROWN HIKING TYPE BOOTS, A PAIR OF RED OR BURGUNDY GLOVES, A PORTABLE WIRELESS TELEPHONE # 443-243-9023 BLACK IN COLOR, OR ANY OTHER ARTICLES PERTAINING TO THE CRIME OF MURDER.

(in violation of the Laws of Maryland)

which is (are)

(evidence relating to the commission of a crime)

pertaining to

FIRST DEGREE MURDER ARTICLE 27 - SECTION 407

and I am satisfied that there is probable cause to believe that the property so described is being concealed on the (person) (premises) (vehicle) above described and that the foregoing grounds for application for issuance of the search warrant exist.

You are therefore commanded, with the necessary and proper assistants, to search forthwith the (person) (premises) (vehicle) herein above described for the property specified, executing this warrant and making the search; and if the property be found there, to seize it; and if upon execution of this warrant, there are found persons then and there engaged in the commission of a crime, arrest those so participating; leaving a copy of this warrant with an inventory of the property seized and returning copy of said warrant and inventory, if any, to me within ten days after execution of this warrant; or, if not served to return this warrant to me promptly, but not later than five days after this expiration, as required by law.

Dated this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

SIGNED \_\_\_\_\_

JUDGE



B 0125

This is an Affidavit in support of a Search and Seizure Warrant for the premises known as: 7034 Johnnycake Road Woodlawn, Maryland 21244.

( Evidence Sought: Any documents or writings authored or receive by Adnan Syed pertaining to the crime of Murder now being investigated. Any documents showing the relationship of Adnan Syed and Hae Min Lee. Any documents or writings authored by Hae Min Lee. Any personal articles of Hae Min Lee that may have been taken during the commission of the murder namely, keys, wallet, credit cards, Maryland drivers license, A.T.M. cards, personal photographs. Tan colored short sleeve shirt with tan and brown stripes, brown hiking type boots, a pair of red or burgundy gloves, a portable wireless telephone # 443-243-9023 black in color, or any other articles pertaining to the crime of murder.

Your Affiant, Detective Police Agent Gregory S. MacGillivray, has been a duly sworn member of the Baltimore City Police Department January, 1984. Your Affiant was assigned to the Homicide Unit in January, 1995. Your Affiant has received numerous hours of specialized training of all facets in the field of death investigations.

Since being assigned to the Homicide Unit, your Affiant has been directly involved in approximately 25 homicide investigations which have occurred in Baltimore City State of Maryland. During your Affiant's tenure with the Baltimore City Police Department, he has written numerous Search and Seizure Warrants, and several warrants for evidence pertaining to the crime of murder. Your Affiant has testified at Federal Court, Circuit and District Court levels as an expert in the field of homicide investigations.

On 09 February 1999, at approximately 2pm., the Baltimore City Police Department responds to the 4400 block N. Franklinton Road, for a body that has been discovered by a passerby.

Members of the Armed Services Medical Examiners Office respond and disinter the remains. A post mortem examination is conducted by the Office Chief Medical Examiner. At the conclusion of the examination, Doctor Korrel Deputy Chief Medical Examiner, rules the manner and cause of death a homicide by strangulation. Subsequently, the victim is identified as Hae Min Lee F/A/17, who has been reported missing by Baltimore County Police on 13 January 1999.

( On 15 March 1999, your Affiant along with Detective William F. Ritz has the occasion to interview a witness to this offense at the offices of homicide. This witness indicates that on 13 January 1999, he/she meets Adnan Syed at a location specified by Syed. Syed, who is driving the victim's auto,

B-0126

opens, the trunk and shows the witness the victims body.

This witness observes Syed who buries the victim in a shallow grave in Leakin Park. Subsequently, Syed parks the victim's automobile at a location in Baltimore City. Syed then gets into his car and drives the witness to a location in Baltimore County where the digging tools are discarded in a dumpster, along with several items from the victim's purse.

The witness also indicates that Syed uses his cell phone to converse with persons during the commission of this murder.

The witness also states that he/she engages Syed in conversation several days after the murder of Hae Min Lee. During this conversation, Syed indicates that he is going to discard his clothing worn during the incident however, he does not. Additionally, Syed states to the witness that he is concerned about forensic evidence that may be exchanged between himself and Hae Min Lee during the commission of the murder.

On 28 February 1999, your Affiant obtains an arrest warrant for Adnan Syed M/P/17, 7034 Johnnycake Road for First Degree Murder. Subsequently, Syed is arrested and charged with warrant # SB00351587 and transported to C.B.I.F. for processing.

Therefore, based on the totality of the circumstances, your Affiant believes that probable cause exists for the issuance of a search and seizure warrant, for the above dwelling which would allow your Affiant, with the proper and necessary assistance, to search the above listed dwelling for any documents or writings authored or received by Adnan Syed pertaining to the crime of Murder now being investigated. Any documents showing the relationship of Adnan Syed and Hae Min Lee. Any documents or writings authored by Hae Min Lee. Any personal articles of Hae Min Lee that may have been taken during the commission of the Murder, namely keys, wallet, credit cards, Maryland drivers license, A.T.M. cards, personal photographs. Tan colored short sleeve shirt with tan and brown stripes, brown hiking type boots, a pair of red or burgundy gloves, a portable wireless telephone # 443-243-9023 black in color, or any other articles pertaining to the crime of murder.

\_\_\_\_\_  
AFFIANT

SWORN TO AND SUBSCRIBED TO BEFORE ME THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 99

\_\_\_\_\_  
JUDGE

## RETURN

I received the attached Search Warrant \_\_\_\_\_ 19\_\_

( and have executed it as follows:

On 3/20 19 99 at 12 o'clock P M

(~~the person~~)

I searched (~~the premises~~) described in the warrant and I left a copy of the warrant  
(~~the vehicle~~)

containing the inventory with Syed M. RAHMAN  
Name of person searched or owner "at location of search"

The following is an inventory of property taken pursuant to the warrant:

2- SCHOOL PAPERS	PERSONAL PAPERS
2- RECEIPTS	GREETING CARDS
1- REPORT CARD	
1- COMPUTER DISK	
1- CELL PHONE 443-243-9023	
1- LINE BRUSH	
2- PAIR OF BOOTS	
1- PAIR OF PANTS	
1- SKIRT	

This inventory was made in the presence of DET. Ritz  
and DET. SPT BONAPARTE

I swear that this inventory is a true and detailed account of all property taken by me on the warrant.

AS Mup / y  
Signature of Affiant

Subscribed, sworn to and returned before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_

Judge

EX-1120 1430 hrs.



B - 0087

**CIB - HOMICIDE**  
**POLICE DEPARTMENT**  
**BALTIMORE, MARYLAND**  
**Progress Report**

**TO:** Commanding Officer  
Homicide Unit

**FROM:** Detective Greg Macgillivray  
& Carew

**SUBJECT:** Progress Report  
Homicide Investigation

**SUSPECTS** (Name, DOB, Race, Sex, Age, Address):

Syed, Adnan Masud [REDACTED] O/ M 17	7034 Johnnycake Road

**VICTIMS** (Name, DOB, Race, Sex, Age, Address):

Lee, Hae Min [REDACTED] A/ F 18	

**OCCURRED:** 02/09/99 1400  
4400 N Franklinton

**CC Number:** 998B05801      **Case Number:** 99H0030  
**District:** SWD      **Post:** 823

On 25 March 1999, your investigator responded to 6700 block Pulaski Highway Abandoned Auto Division and executed a Search and Seizure Warrant for the defendants auto. Sgt. Dixon witnessed the event.

Crime Lab Technician Oswald responded and removed a section of the auto's carpet, headliner and seat fabric. These items were recovered by Technician Oswald who submitted same into evidence.

Investigation to continue.

Respectfully,

CIB - Homicide

Page 1  
\_\_\_\_\_  
Approving Supervisor

\_\_\_\_\_  
Primary Investigator

MP1A 15 459.088  
Date: 04/27/99

CIRCUIT COURT OR DISTRICT COURT OF MARYLAND  
DISTRICT 1 - BALTIMORE CITY

B-0116

Application for Search  
& Seizure Warrant  
Form 94/188a

To the Honorable Judge \_\_\_\_\_ of the \_\_\_\_\_

the undersigned being duly sworn deposes and says that he (~~she~~) has (~~some~~) reason to believe  
(in the vehicle) 1987 Honda Accord 4-DOOR SEDAN TAN IN COLOR Maryland Registration  
PHW 202 V.I.N.# 1HGCA5632HA046588. REGISTERED IN THE NAME OF SYED MASUDUR RAHMAN 7034  
JOHNNYCAKE ROAD 21244.

in the City of Baltimore there is now being concealed certain property, namely;

FIBER SAMPLES FROM THE CARPET, SEATS AND HEADLINER

which ~~is~~ (are)

~~In violation of the Laws of Maryland~~

pertaining to

(evidence relating to the commission of a crime)

FIRST DEGREE MURDER ARTICLE 27 - SECTION 407.

AND that the facts tending to establish grounds for issuance of Search Warrant are set forth  
in the Affidavit( ) attached thereto and made a part thereof

WHEREFORE your Affiant( ) pray(s) that a Search & Seizure Warrant be issued for said

1987 HONDA ACCORD MD. TAG # PHW 202

Signature of Affiant

Rank or Title

SWORN to before me and subscribed to in my presence this \_\_\_\_\_ day of \_\_\_\_\_

Judge



CIRCUIT COURT OR DISTRICT COURT OF MARYLAND  
DISTRICT 1 - BALTIMORE CITY

Search & Seizure Warrant  
Form 94/187a

to: Any Police Officer of Baltimore City:

Affidavit having been made before me by GREGORY S. MACGILLIVRAY DETECTIVE

Affiant - Name & Rank

Said Affidavit being incorporated by reference into this warrant and made a part thereof,  
that he (~~they~~) has (~~have~~) reason to believe

(in the vehicle) 1987 HONDA ACCORD FOUR DOOR SEDAN TAN IN COLOR MARYLAND REGISTRATION  
HW 202 V.I.N.# 1HGA5632HA046588. REGISTERED IN THE NAME OF SYED MASUDUR RAHMAN 7034  
WHANNYCAKE ROAD 21244.

In the City of Baltimore, there is now being concealed certain property, namely:

FIBERS SAMPLES FROM THE CARPET, SEATS, HEADLINER

which ~~is~~ (are)

(~~in violation of the laws of Maryland~~)  
(evidence relating to the commission of a crime)

pertaining to

FIRST DEGREE MURDER ARTICLE 27 - SECTION 407.

and I am satisfied that there is probable cause to believe that the property so described is  
being concealed on the (~~premises~~) (~~premises~~) (vehicle) above described and that the foregoing  
grounds for application for issuance of the search warrant exist.

You are therefore commanded, with the necessary and proper assistants, to search  
forthwith the (~~person~~) (~~premises~~) (vehicle) herein above described for the property  
specified, executing this warrant and making the search; and if the property be found there,  
seize it; and if upon execution of this warrant, there are found persons then and there  
engaged in the commission of a crime, arrest those so participating; leaving a copy of this  
warrant with an inventory of the property seized and returning copy of said warrant and  
inventory, if any, to me within ten days after execution of this warrant; or, if not served  
return this warrant to me promptly, but not later than five days after this expiration,  
required by law.

Signed this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

SIGNED \_\_\_\_\_

Judge

This is an affidavit in support of a Search and Seizure Warrant for the below listed vehicle: 1987 Honda Accord four door sedan tan in color Maryland Registration FHW 202 V.I.N. # 1HGAS632HA046588. REGISTERED IN THE NAME OF SYED MASUDOR RAHMAN 7034 JOHNNYCAKE ROAD .1244.

EVIDENCE SOUGHT: FIBER SAMPLES FROM THE CARPET, SEATS, HEADLINER

Which is evidence relating to the commission of a crime pertaining to First Degree Murder - Article 27 Section 407.

Your Affiant, Detective Police Agent Gregory S. MacGillivray, has been a duly sworn member of the Baltimore City Police Department January, 1984. Your Affiant was assigned to the Homicide Unit in January, 1995. Your Affiant has received numerous hours of specialized training of all facets in the field of death investigations.

Since being assigned to the Homicide Unit, your Affiant has been directly involved in approximately 25 homicide investigations which have occurred in Baltimore City State of Maryland. During your Affiant's tenure with the Baltimore City Police Department, he has written numerous Search and Seizure Warrants, and several warrants for evidence pertaining to the crime of murder. Your Affiant has testified at Federal Court, Circuit Court and District Court levels as an expert in the field of homicide investigations.

On 09 February 1999, at approximately 2pm., the Baltimore City Police Department responded to the 4400 block N. Franklinton Road, for a body that had been discovered by a passerby.

Members of the Armed Services Medical Examiners Office responded and disinterred the remains. A post mortem examination was conducted by the Office Chief Medical Examiner. At the conclusion of the examination, Doctor Korrel Deputy Chief Medical Examiner, ruled the manner of death a homicide. Subsequently, the victim was identified as Hae Min Lee F/A/17, who had been reported missing by Baltimore County Police on 13 January 1999.

On 15 March 1999, your Affiant along with Detective William F. Ritz has the occasion to interview a witness to this offense at the offices of homicide. This witness indicates that on 13 January 1999, he/she meets Adnan Syed at a location specified by Syed. Syed, who is driving the victim's auto, opens the trunk and shows the witness the victim's body.

This witness observes Syed who buries the victim in a shallow grave in Leakin Park. Subsequently, Syed parks the victim's automobile at a location in Baltimore City. Syed then gets into his car and drives the witness to a location in Baltimore County where the digging tools are discarded in a dumpster, along with several items from the victim's purse.

The witness also indicates that Syed uses his cell phone to converse with persons during the commission of this murder.

The witness also states that he/she engages Syed in conversation several days after the murder of Hae Min Lee. During this conversation, Syed indicates that he is going to discard his clothing worn during the incident however, he does not. Additionally, Syed

states to the witness that he is concerned about forensic evidence that may be exchanged between himself and Hae Min Lee during the commission of the murder.

On 28 February 1999, your Affiant obtains an arrest warrant for Adnan Syed M/P/17, 7034 Johnnycake Road for First Degree Murder. Subsequently, Syed is arrested and charged with warrant # 5B00351587 and transported to C.B.I.F. for processing.

Therefore, based on the totality of the circumstances, your Affiant believes that probable cause exists for the issuance of a search and seizure warrant, for the above vehicle which would allow your Affiant, with the proper and necessary assistance, to search the listed vehicle for fiber samples from the carpet, seat covers and headliner.

---

AFFIANT

SWORN TO AND SUBSCRIBED TO BEFORE ME THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 1999

---

JUDGE





B - 0086

**CIB - HOMICIDE**  
**POLICE DEPARTMENT**  
**BALTIMORE, MARYLAND**  
**Progress Report**

**TO:** Commanding Officer  
Homicide Unit

**FROM:** Detective Greg Macgillivray  
& Carew

**SUBJECT:** Progress Report  
Homicide Investigation

**SUSPECTS**(Name, DOB, Race, Sex, Age, Address):

Syed, Adnan Masud [REDACTED] O/ M 17	7034 Johnnycake Road

**VICTIMS**(Name, DOB, Race, Sex, Age, Address):

Lee, Hae Min [REDACTED] A/ F 18	

**OCCURRED:** 02/09/99 1400  
4400 N Franklinton

**CC Number:** 998B05801      **Case Number:** 99H0030  
**District:** SWD      **Post:** 823

On 25 March 1999, your investigator along with Detective William F. Ritz had the occasion to respond to the Baltimore City Division of Corrections with a writ signed by the Honorable Judge Roger Brown for one Adnan Syed.

Syed was transported to Mercy Hospital where a Search and Seizure was executed for Syed's blood and head hair.

At the conclusion of the service, Syed was transported back to B.C.D.C. respectively.

Investigation to continue.

**Respectfully,**

**CIB - Homicide**

This is an Affidavit in support of a Search and Seizure Warrant for a person known as: Adnan Syed 7034 Johnnycake Road Woodlawn, Maryland 21444.M/P/17 05/21/81.

Evidence Sought: plucked head hair, two vials of blood.

Your Affiant, Detective Police Agent Gregory S. MacGillivray, has been a duly sworn member of the Baltimore City Police Department January, 1994. Your Affiant was assigned to the Homicide Unit in January, 1995. Your Affiant has received numerous hours of specialized training of all facets in the field of death investigations.

Since being assigned to the Homicide Unit, your Affiant has been directly involved in approximately 25 homicide investigations which have occurred in Baltimore City State of Maryland. During your Affiant's tenure in the Baltimore City Police Department, he has written numerous Search and Seizure Warrants, and several warrants for evidence pertaining to the crime of murder. Your Affiant has testified at Federal Court, Circuit and District Court levels as an expert in the field of homicide investigations.

On 09 February 1999, at approximately 2pm., the Baltimore City Police Department responds to the 4400 block N. Franklintown Road, for a body which has been discovered by a passerby.

Members of the Armed Services Medical Examiners Office respond and retrieve the remains. A post mortem examination is conducted by the Office of Medical Examiner. At the conclusion of the examination, Doctor Korrel, Deputy Chief Medical Examiner, rules the manner and cause of death a homicide by strangulation. Subsequently, the victim is identified as Hae Min Lee, 34/17, who has been reported missing by Baltimore County Police on 13 January 1999.

On 15 March 1999, your Affiant along with Detective William F. Ritz, on the occasion, to interview a witness to this offense at the offices of the Homicide Unit. This witness indicates that on 13 January 1999, he/she meets Adnan Syed at a location specified by Syed. Syed, who is driving the victim's auto, opens the trunk and shows the witness the victim's body.

This witness observes Syed who buries the victim in a shallow grave in Leakin Park. Subsequently, Syed parks the victim's automobile at a location in Baltimore City. Syed then gets into his car and drives the vehicle to a location in Baltimore County where the digging tools are discarded in a dumpster, along with several items from the victim's purse.

# ATTACHMENT 8

1. Police Report of Investigation, February 14, 1999 (1 page) (B-0003)
2. Defense Memo to Gutierrez, August 25, 1999 (1 page) (A-0153)
3. Handwritten Account by Syed of January 13, 1999, corresponding to Defense Memo to Gutierrez, August 25, 1999 (1 page) (A-0154)
4. Attorney Notes to File, updated August 4, 1999 (1 page) (A-0145)
5. Defense Task List, September 4, 1999 (6 pages) (A-0261-A-0266)

CONFIDENTIAL

## REPORT OF INVESTIGATION

NAME OF SUBJECT SYED, ADNAN MASUD	DATE SUBMITTED 02/14/99
	TYPE OF INVESTIGATION LEE MISSING PERSON 99-013-1074

NOTICE: THE INFORMATION CONTAINED IN THIS REPORT IS HIGHLY  
CONFIDENTIAL. DISSEMINATION OF INFORMATION TO ANY PERSON  
WITHOUT A NEED TO KNOW IS STRICTLY FORBIDDEN.

## REPORT OF FINDINGS:

INTERVIEWED: SYED, ADNAN MASUD  
INDIAN MALE, DOB 05/21/81  
7034 JOHNNYCAKE ROAD  
BALTIMORE, MD 21228  
TELEPHONE [REDACTED]  
[REDACTED]  
RELATION: EX-BOYFRIEND, SCHOOLMATE  
OF HAE LEE

On 01/25/99 the assigned went to Adnan Syed's residence and I was informed by a woman that Adnan was in school. I received a phone call from Adnan later that day. Adnan said he was in class with Hae Lee on 01/13/99 from 1250 to 1415 hours. Adnan went to track practice after school and he did not see Hae Lee leave. Adnan said school was closed due to bad weather on 01/14 and 01/15.

Adnan said he dated Hae Lee in 1998 but they ended their relationship due to religious differences. Adnan said he is Muslim and his parents did not want him dating anyone. Adnan said they kept their relationship private due to their families. Adnan said he was still a good friend of Hae and he had no idea where she was.

On 02/01/99 the assigned spoke with Adnan regarding his conversation with Officer Adcock. I asked Adnan if he told Off. Adcock that Hae was waiting to give Adnan a ride on 01/13. Adnan said this was incorrect because he drives his own car to school.

The assigned had several more phone conversations with Adnan Syed and I attempted to arrange

SIGNATURE OF INVESTIGATOR



NAME OF INVESTIGATOR

Detective J. O'Shea #2828

## MEMORANDUM

TO: MCG  
FROM: KALI (K)  
DATE: AUGUST 25, 1999  
RE: INTERVIEW WITH ADNAN SYED

---

On August 21, 1999, I met with Adnan at the Baltimore City Detention Center to discuss the filming in the detention center on August 17 or 18, 1999.

Adnan stated the filming aired on the 6 p.m. news on Channel 2 on August 20, 1999. He stated that the news showed his hands, his t-shirt, and his shorts. There was no footage of his cell. Adnan stated that what was aired did not distinguish him at all and only he was able to recognize himself because he knew what he had on.

He stated that the "goon squad" has random shake-downs for contraband/knives, etc. They are in full gear and place the inmates in handcuffs, remove the inmates from their cells and search the inmate and the cell. This is the standard "shake-down" procedure according to Adnan in which the "goon squad" goes from cell to cell. Nothing was found in Adnan's cell during the shake-down, nor has there ever been anything found in his cell.

**Information regarding Jay Wilds**

Adnan states he has known Jay since 7th grade. Jay was in the 8th grade and Adnan was in the 7th. They attended Johnnycake Middle. They did not hang out together, but began to do so in Fall 1998 because of Stephanie. Jay provided Adnan with weed. He paid for it sometimes, but usually not because Jay always had weed. Adnan states he smoked with Jay less than 10 times.

**Information regarding January 13, 1999**

States he believes he attended track practice on that day because he remembers informing his coach that he had to lead prayers on Thursday. Hae's brother called Adnan on his cell phone. He initially asked for Don (thinking it was the current boyfriend's number) and then realized it was Adnan. He asked if Adnan had seen Hae and then a police officer got on the phone. Adnan does not remember where he was when Hae's brother called, but he believes he was in his car with Jay. He states he keeps his cell phone in the glove compartment and recalls reaching over Jay to get the phone from the glove compartment.

*Provided a handwritten account of his recollection of his whereabouts on Jan 13 and his efforts in ensuring Hae had a proper memorial service. (ATTACHED)*



\* 1-12-99 - arrive at school 7:45

\* 1st pd. 7:50 - 9:15 - Photo of S. Margaret Musa

nothing significant / no remembrance - don't remember lesson plan

\* 2nd pd. 9:20 - 10:45 - AP English - Ms. Jane E. Fran

gave Stephanie McParron (Jay's girlfriend) b-day

present - stuffed Teddy Bear, B-day card.

don't remember lesson plan

\* Lunch 10:50 - 11:15 - left school, went to Jay's

house. don't know what we did, came back

to school 12:40 - left Jay, borrow my car (cell phone

in glove compartment)

\* 12:40 - went to guidance office - Ms. Bettye Stuebe - counselor -

to get college recommendation letter - (copy w/ date 1-13-99

in packet of letters for bail hearing)

\* 4th pd. - 12:50 - 2:15 - I arrived a few minutes before 1:00, cause

it took some time in the guidance office



Updated 8/4/99

Request  
Report for  
Latent Print  
Comparison**ADNAN MASUD SYED - Information in file involving Jay Wilds**

BPI # 1997 957

**ATTORNEY NOTES**

On January 13, 1999 Adnan left school and went to Jay's house. Unclear about what time he was specifically there. @ 10:15 a.m. - 1:13 p.m. (was in school at 1:13 p.m. because Mrs. Stucky printed out his recommendation letter).

Jay had Adnan's car. Jay needed the car because Stephanie would not lend the car to him. Jay took Adnan's car during 3rd period.

Jay was to pick up Adnan after track practice.

Jay was jealous of Adnan and Stephanie. He saw pictures of them in wallet a couple of days before. Jay and Stephanie were a couple. Adnan and Stephanie were Prom Prince and Prom Princess 1998 - Jr. Prom 4/25/98. Adnan refers to Stephanie as "one of his boys". He was friends with Jay through Stephanie and spent time together when they wanted to "smoke up".

*\*\*Possible discrepancy as to whether Adnan stated Hae or Jay were going to pick up Adnan\*\**

On January 13, 1999, Police Officer Adcock of the Baltimore County Police Department spoke to Adnan. His report indicated Adnan advised the officer that Lee was supposed to give him a ride home after school but Adnan was running late. Adnan felt that Lee probably left after waiting a while. On February 1, 1999 Officer O'Shea questioned Adnan regarding the conversation he had on the 13th with Officer Adcock. Adnan said that the information Officer Adcock relayed that Hae was waiting for Adnan to give Adnan a ride home was incorrect because Adnan drives his own car to school.

**STATEMENT OF PROBABLE CAUSE**

Interviewed several people regarding the death of Hae Min Lee. Indicated defendant strangled victim to death and buried remains within Leakin Park. Witness anonymous until trial.

**MOTION IN LIMINE**

Unindicted accessory after the fact made statements regarding this offense. Intends to call this witness at trial.

**AFFIDAVIT IN SUPPORT OF SEARCH AND SEIZURE WARRANT - Premises**

March 15, 1999 - Det. MacGillivray and Det. Ritz interviewed witness re homicide of Hae. Witness indicated that on Jan. 13, 1999 he met Adnan at location specified by Syed. Syed was

Date: 09.04.99

Re: ADNAN SYED, 5540.1402

TTD

Attorney/Client Privilege &  
Material Work Product  
Privileged Material

TASK	PERSON(S) ASSIGNED	NOTES
Response to Motion in Limine	ML	<i>Done</i>
Motion to Compel	ML and KP	<i>Motion to Compel Done Another ?</i>
Letter to Syed family requesting money	MCG	done 09/07/99
Letter to Urick demanding to see the scene w/ aid of individuals present at the crime scene on 02/09/99 and State for Appropriate Relief	ML MCG	delivered <i>File w/ Motion to be filed in for 2 "showing"</i>
Find out Balto. Cnty. Police protocol for initiating missing person investigation. Find out protocol for joint investigations. Why weren't Balto. Cnty. police involved. Balto. Cnty Cops involved SDT Balto County Missing Persons and Homicide file	Drew Davis ✓	<i>urgent</i>
Obtain and review Balto. Cnty. missing person file. SDT for trial, Tangible Evidence, Ex Parte	Drew Davis ✓ ML	
Need to subpoena Hae Lee's work records and records of boyfriend, at Lenscrafters SDT for trial, Tangible Evidence, Ex Parte	ML	
Any priors/police responses to Lee family.	Drew Davis ✓ ML	

*Phone Reps*  
\\NW2\SYS\docs\DATA\Syed\ToDo.doc 5540.1402

*Dr. g. file*

Date: 09.04.99

Re: ADNAN SYED, 5540.1402  
TTDAttorney/Client Privilege &  
Material Work Product  
Privileged Material

TASK	PERSON(S) ASSIGNED	NOTES
Obtain every police report in existence concerning Alonzo Sellers and Jay Wilds. Find the connection.	Thornton Daniels and Drew Davis ✓	9.24
Discover whereabouts of Alonzo Sellers on January 13th	Thornton Daniels and Drew Davis	SDT etc filed for Copy
Ltr & SDT to BFI, Waste Mgmt., records of dumpsters SDT for trial, Tangible Evidence, Ex Parte	ML	to be filed 9.24
Dist. Ct. Tapes (ltr dated 08/06/99) 03/01, initial bail hearing 03/09, second bail hearing 04/05, preliminary hearing, pp 04/13, preliminary hearing	ML	need ASAP letter sent requesting all part some
criminal records on all witnesses	ML + Drew ✓ A.P.	
SDT FBI Reports and notes SDT for trial, Tangible Evidence, Ex Parte	ML + Drew ✓	re: agent in Leakin Park
SDT <del>3 dumpsters</del> Dept. of Public Works, reports and notes SDT for trial, Tangible Evidence, Ex Parte	ML	at Leakin Park Supervisor *** *** who when called
review photos of crime scene another other photos	ML Drew D MCT ✓	schedule review on 09/13/99, letter requests of copying Done ML letter re video of CS scene
SDT Baltimore Co. Police Dept. homicide file, all reports, missing person file and all reports SDT for trial, Tangible Evidence,		any other photos Det. - COIT + CC

Date: 09.04.99

Re: ADNAN SYED, 5540.1402  
TTDAttorney/Client Privilege &  
Material Work Product  
Privileged Material

TASK	PERSON(S) ASSIGNED	NOTES
Ex Parte		
SDT Lencrafters, Hae's employment records and time sheets SDT for trial, Tangible Evidence, Ex Parte		Hae's personnel file Donald Clindinst's personnel file time sheets for 12/01/98 - 02/28/99 Lencrafters G.M: Carolyn Tunnel (TwinStore) 825 Dulany Valley Rd. Suite 32 Towson, MD 21204 410-825-5343 9.24 Send SDT no store
SDT Woodlawn H.S. and Balto Co. Board of Education Records on: Hae Adnan Jay Stephanie class schedule, attendance record teachers assigned to all senior classes SDT for trial, Tangible Evidence, Ex Parte		Send subpoena to Woodlawn H.S. Attn: Ms. Eisha Evans 1801 Woodlawn Dr. Baltimore, MD 21207 phone #410-887-1359 9.24
SDT Donald Clindinst criminal record, school records SDT for trial, Tangible Evidence, Ex Parte	ML Grew Hartford Co.	
SDT Baltimore Co. Police Dept any prior complaints to Lee's address SDT for trial, Tangible Evidence, Ex Parte	ML	
SDT Alonzo Sellers criminal record, all police reports of any prior arrests or interactions w/ police SDT for trial, Tangible Evidence, Ex Parte	ML	





Date: 09.04.99  
 Re: ADNAN SYED, 5540.1402  
 TTD

Attorney/Client Privilege &  
 Material Work Product  
 Privileged Material

TASK	PERSON(S) ASSIGNED	NOTES
Mosque		
Leakin Park 4400 block N. Franklinton Road		
Alonzo Sellers' house, 6545 Gilmore Street, Woodlawn		
Copping State College <ul style="list-style-type: none"> <li>• maintenance department</li> <li>• *** of security guard</li> </ul>		
Wetherdsville Rd -- when open -- when closed		
Dumpsters <ul style="list-style-type: none"> <li>• Westview Mall (Calder)</li> <li>• (2) Rite Aid</li> </ul> <del>Calder</del> <ul style="list-style-type: none"> <li>• Petsmart, Rt. 40 West, Catonsville</li> </ul>		
Hae's house		
Syed's house		
Hae's work		



Date: 09.04.99  
 Re: ADNAN SYED, 5540.1402  
 TTD

Attorney/Client Privilege &  
 Material Work Product  
 Privileged Material

TASK	PERSON(S) ASSIGNED	NOTES
Hae's p/up at daycare		
Where Hae's car was found		
Jay's house		
Jay's work <ul style="list-style-type: none"> <li>• porn store</li> <li>• Petsmart</li> </ul>		
Cell Towers		
Wetherdsville Road and Windsor Mill Road		
Earl Carter, 5910 Charmwood, 21244		
Woodlawn Library		

# ATTACHMENT 9

1. Notice of Alibi, October 4, 1999 (3 pages) (State's Ex. 1)
2. Handwritten Task List, undated (1 page) (A-0695)
3. Defense Memo to Gutierrez, December 15, 1999 (1 page) (A-0230)
4. Page 4 of Defense Task List, September 4, 1999 (1 pages) (A-0264)
5. Detective Notes, Virginia Madison Interview, March 24, 1999 (2 pages) (B-0247-B-0248)
6. Detective Notes, Cheryl Metzger Interview, March 24, 1999 (1 page) (B-0251)
7. Defense Memo to Gutierrez, October 12, 1999 (4 pages) (A-0189-A-0192)
8. Defense Memo to Gutierrez, January 15, 2000 (2 pages) (A-0234-A-0235)

REDMOND & GUTIERREZ, P.A.

ATTORNEYS AT LAW  
THE FIDELITY BUILDING, SUITE 1301  
210 NORTH CHARLES STREET  
BALTIMORE, MARYLAND 21201-4105

(410) 752-1555

Facsimile: (410) 752-1064

LEONARD C. REDMOND, III  
HAROLD L. BURGIN\*  
JOSEPH L. TIVVIS, JR.  
BAMBI GLENN  
RITA PAZNOKAS

PRINCE GEORGE'S COUNTY OFFICE  
14746 MAIN STREET  
UPPER MARLBORO, MARYLAND 20772  
(301) 952-1555

M. CRISTINA GUTIERREZ

\* ALSO ADMITTED IN THE DISTRICT OF COLUMBIA

October 4, 1999

VIA HAND-DELIVERY

Kevin Urick, Esq.  
Office of the State's Attorney  
for Baltimore City  
Mitchell Courthouse  
100 N. Calvert Street  
Baltimore, MD, 21202

RE: *State of Maryland v. Adnan Syed*  
Circuit Court for Baltimore City  
Case No. 199103042-46  
Our File: 5551.1402

Dear Mr. Urick:

These witnesses will be used to support the defendant's alibi as follows: On January 13, 1999, Adnan Masud Syed attended Woodlawn High School for the duration of the school day. At the conclusion of the school day, the defendant remained at the high school until the beginning of his track practice. After track practice, Adnan Syed went home and remained there until attending services at his mosque that evening. These witnesses will testify to as to the defendant's regular attendance at school, track practice, and the Mosque; and that his absence on January 13, 1999 would have been noticed.

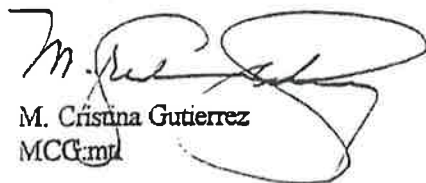
Abbas Contractor, 8 Senta Court, Baltimore, MD 21244  
Anisha A. Contractor, 8 Senta Court, Baltimore, MD 21244  
Abdul Hasnuddin, 7 Glen Wilton Court, Baltimore, MD 21228  
Meraj Hasnuddin, 7 Glen Wilton Court, Baltimore, MD 21228  
Adila Aurangzeb, 15 Glencoe Manor Court, Sparks, MD 21152  
Adnan Khattak, 1420 Harberson Road, Baltimore, MD 21228  
Mohammad Imran Khattak, 1420 Harberson Road, Baltimore, MD 21228  
Ahmed Abdul Moiz, 1522 Rawlings Well Road, Baltimore, MD 21228  
Aiysha Moiz, 1522 Rawlings Well Road, Baltimore, MD 21228  
Mohammed Alikhan, 17 East Cross Street, Baltimore, MD 21230  
Anamar Al-Badarneh, 2204 Riding Crop Way, Baltimore, MD 21244  
Summer Atiya Al-Badarneh, 2204 Riding Crop Way, Baltimore, MD 21244



Mohammed Alikhan, 17 East Cross Street, Baltimore, MD 21230  
 Ammar Al-Badarneh, 2204 Riding Crop Way, Baltimore, MD 21244  
 Summer Atiya Al-Badarneh, 2204 Riding Crop Way, Baltimore, MD 21244  
 Amtul Bashir, 40 Pacton Place, Baltimore, MD 21244  
 Bilal Ahmed, 40 Pacton Place, Baltimore, MD 21244  
 Anwarul H. Chaudry, 1228 Pleasant Valley Drive, Baltimore, MD 21228  
 Khalida A.K. Chaudry, 1228 Pleasant Valley Drive, Baltimore, MD 21228  
 Arian A. Waseem, 11010 Nacrima Court, Stevenson, MD 21153  
 Malika Firdous Waseem, 11010 Nacrima Court, Stevenson, MD 21153  
 Badr E Oweis, M.D., 612 Edmondson Avenue, Baltimore, MD 21228  
 Cilia Kader Ndiaye, 2 Craven Court, Baltimore, MD 21244  
 Abu Bakar Ndiaye, 2 Craven Court, Baltimore, MD 21244  
 Farooq A Marfani, 4 Lenis Court, Baltimore, MD 21244  
 Rabia Marfani, 4 Lenis Court, Baltimore, MD 21244  
 Khan Pathan, 2071 Park Trail Road, Baltimore, MD 21244  
 Rafia Chaudhry, 2071 Park Trail Road, Baltimore, MD 21244  
 Loay Oweis, 4705 Hallowed Stream, Ellicott City, MD 21042  
 Maqbool H Patel, 9 Randolph Spring Court, Baltimore, MD 21228  
 Shahinza Patel, 9 Randolph Spring Court, Baltimore, MD 21228  
 Mustafa Ali Khan, 6627 Johnnycake Road, Baltimore, MD 21244  
 Masood Ali Khan, 6627 Johnnycake Road, Baltimore, MD 21244  
 Mazhar A Baig, 2026 Cross Trails Road, Baltimore, MD 21244  
 Surraiya Ahmed Baig, 2026 Cross Trails Road, Baltimore, MD 21244  
 Mohammed Aslam Khan, 1027 Cummings Avenue, Baltimore, MD 21228  
 Mohammed N. Khattak, 1420 Harberson Road, Baltimore, MD 21228  
 Sameena Khattak, 1420 Harberson Road, Baltimore, MD 21228  
 Mohamed Amjad Mian, 4414 Wynfield Drive, Owings Mills, MD 21117  
 Nargis Amjad Mian, 4414 Wynfield Drive, Owings Mills, MD 21117  
 Mohammed Ijaz Mufti, 1711 Chesterton Road, Baltimore, MD 21228  
 Farhana Mufti, 1711 Chesterton Road, Baltimore, MD 21228  
 Kashif Munir, 2401 Battersea Place, Baltimore, MD 21244  
 Sadia Munir, 2401 Battersea Place, Baltimore, MD 21244  
 Mohammed Mustafa Qalawee, 2517 Sarrington Circle, Baltimore, MD 21244  
 Leslie M. Qalawee, 2517 Sarrington Circle, Baltimore, MD 21244  
 Muhammed Tufail Chaudhry, 2071 Park Trail Road, Baltimore, MD 21244  
 Mujtaba Ali Khan, 6627 Johnnycake Road, Baltimore, MD 21244  
 Nauman Khokar, 6 Cedar Bluff Court, Baltimore, MD 21228  
 Nauman H Siddiqi, 15 Glencoe Manor Court, Sparks, MD 21152  
 Ossama Abdou, , Baltimore, MD  
 Laila Abdou, , Baltimore, MD  
 Presley Cason, Jr., 4234 Mary Ridge Drive, Randallstown, MD 21133  
 Gloria O. Cason, 4234 Mary Ridge Drive, Randallstown, MD 21133  
 Presley Cason, III, 5511 Stonington Avenue, Baltimore, MD 21207  
 Lisa Cason, 5511 Stonington Avenue, Baltimore, MD 21207  
 Nasreen Rahman, 118 Gale Wood Road, Timonium, MD 21093  
 Samer E Atiya, 2204 Riding Crop Way, Baltimore, MD 21244  
 Sardar Hasan Khan, 9744 Gudel Drive, Ellicott City, MD 21043  
 Surraiya N. Khan, 9744 Gudel Drive, Ellicott City, MD 21043  
 Sartaj Lodhi, 7011 Glen Spring Road, Baltimore, MD 21244  
 Qudsia Wahab Lodhi, 7011 Glen Spring Road, Baltimore, MD 21244

Sara Patel, 9 Randolph Spring Court, Baltimore, MD 21228  
Syed Habeeb Ashruf, 1301 Lincoln Woods Drive, Baltimore, MD 21228  
Aneesa Ashruf, 1301 Lincoln Woods Drive, Baltimore, MD 21228  
Sayeed A. A Hashmi, 6210 Craigmont Road, Baltimore, MD 21228  
Shahrukh A Hashmi, 6210 Craigmont Road, Baltimore, MD 21228  
Syed Abid Husain, 2 Mc Lendon Court, Baltimore, MD 21244  
Tahseen A. Husain, 2 Mc Lendon Court, Baltimore, MD 21244  
Syed Wahid Husain, 2004 Greengage Road, Baltimore, MD 21244  
Syed Zahid Husain, 4 Mc Lendon Court, Baltimore, MD 21244  
Rabia Z. Husain, 4 Mc Lendon Court, Baltimore, MD 21244  
Tarik S. Ideis, P.D., P.O. Box 653, Ellicott City, MD 21041  
Aida T. Ideis, P.D., P.O. Box 653, Ellicott City, MD 21041  
Umar I. Mustafa, 8211 Chandler Court, Ellicott City, MD 21043  
Annette D. Mustafa, 8211 Chandler Court, Ellicott City, MD 21043  
Usman Mian, 4414 Wynfield Drive, Owings Mills, MD 21117  
Michael Clites, 1801 Woodlawn Dr., Baltimore, MD 21207  
Clevon Johnson, 1801 Woodlawn Dr., Baltimore, MD 21207  
Anthony Jenkins, 1801 Woodlawn Dr., Baltimore, MD 21207  
William McCray, 1801 Woodlawn Dr., Baltimore, MD 21207  
Aaron Noriega, 1801 Woodlawn Dr., Baltimore, MD 21207  
Dorrell Walker, 1801 Woodlawn Dr., Baltimore, MD 21207  
Kehinde Adeboye, Baltimore, MD  
Joel Brown, Baltimore, MD  
Saad Chaudry, 1228 Pleasant Valley Dr., Caronsville, MD 21043

Sincerely,



M. Cristina Gutierrez  
MCG:mt

Things to do:

Fill in witness list

Line up alibi witnesses,  
truck  
mosque

Respond to diary

Drinking / Bad Acts

Cell phone subpoena

Serologist

Ex Parte

School records

Petsmart

Teacher

subpoenas

Demand to Review evidence

4:263(b)(6) - property of def.



## MEMORANDUM

A - 0230

TO: MCG  
 FROM: MTL  
 DATE: December 15, 1999  
 RE: SYED  
 C/M#: 5540-1402  
 CC: FILE

Drew Davis, 410-913-0607, called.

We need to contact **All** of the following and tell them what to do, when to do it, and where.

Drew spoke with the following, and therefore they are expecting our direction:

	HOME	WORK	
Syed, Afhruf	410-747-3534		spoke personally with Mrs. Afhruf & gave her message
Gan, Djhabervez	410-931-0971	410-767-2175	spoke personally with Mrs. Gan & gave her message
* Kahn, Azim	410-992-8867		his # is not in service
Naqvi, Zarzafar	410-465-9538		left message on answering machine
Thomas, James	410-461-0573	410-767-4504	(African-American) spoke with daughter, Harry, and gave her message

Drew has not spoken with:

* Rahman, Nafreen	410-252-2175	spoke with her & gave her message
* Cason, Presley	410-448-5364	spoke with her & gave him the message
* Patel, Maqbool	410-455-9762	spoke with Mom & left message
* Malik, Dr. Ramen	410-560-2888	spoke with Dr. Malik's son, Yousof, and gave him the message for his dad.

Drew also needs the **Subpoenas** for **Track & Field members** and the **Guidance Counselors**.

See Attachment

\* Bettye Stuckey-Woodlawn  
 High School # 887.1309

\* needs to be followed up with during the day -- another # possibly

Date: 09.04.99

Re: ADNAN SYED, 5540.1402  
TTDAttorney/Client Privilege &  
Material Work Product  
Privileged Material

TASK	PERSON(S) ASSIGNED	NOTES
SDT Pet World Smart employment records of Jay Wilds, time sheets, personnel file	<i>Drew Kuli</i>	PA Smart - 7721 Alaski Hwy (Rt. 46) Send SDT: Pet Smart Attn: Payroll Dept 19601 N. 27th Ave. Phoenix, AZ 85027
SDT Porno Store <del>xxx</del> need name employment records of Jay Wilds SDT for trial, Tangible Evidence, Ex Parte	<i>Drew Kuli</i>	
SDT Jay Wilds prior record <del>xxx</del> -- Balto City and Balto County all police record, MVA records SDT for trial, Tangible Evidence, Ex Parte	<i>Drew Kuli</i>	
Make request to view the physical evidence w/ Adnan	MCG ML	State answered w/ no "showings" response
Make determination regarding alibi	MCG and ML	let f. Student new school after for " " Perf at Morgan " " at Train Practice
Computer • develop powerpoint demo • computer diagrams/photos	ML	
MAPS		
Woodlawn High School	<i>Kali Drew</i>	
Woodlawn High School Track practice	<i>Kali Drew</i>	

--LIST  
--SIGN IN SHEETS  
--HARD DRIVE  
FOR ▲'S INFOR

3/24/99

VIRGINIA MADISON  
ASST. TO LIBRARIAN

▲ CAME INTO LIBRARY FREQUENTLY  
SEVERAL DAYS IN A.M. (USE COMPUTER)

SOMETIMES AT LUNCH -- 3RD / 4TH PERIOD  
SITTING ON SIDE

HAVE TO HAVE A PASS TO COME IN LIBRARY  
LUNCH ROOM TEACHER MUST GIVE PASS.

CAN'T RECALL NAMES OF INDIVIDUALS WITH HIM  
KNOW ▲ DOESN'T RETURN LIBRARY BOOKS.

HAVE BEEN ASKING AND ASKING  
NEVER COULD UNDERSTAND THAT BECAUSE THEY'VE  
BEEN OUT A WHILE. THEY WERE FOR ENGLISH /  
SHAKESPEARE / MS. EFRON'S CLASS.

LUNCH 3RD AND 4TH PERIOD:  
12:15 -- 12:50

HE AND VICTIM IN LIBRARY OFTEN BEFORE VICTIM DIED  
3RD PERIOD

TAKE NOTICE WHEN KIDS WERE IN THERE LONGER:  
HE SAID HE HAS FREE PERIOD AND LUNCH PERIOD

HAVE SIGN IN SHEET  
SOMETIMES THEY DON'T SIGN IT IF WE'RE NOT  
STANDING THERE.

→ NEED SHEETS FROM SEPT. → NOV.

SAAD PATEL, IMRON, SYED HANG OUT --  
OWES BOOKS

MUST ASK TO USE COMPUTERS  
7 TO 8 COMPUTERS  
3 HAVE INTERNET

▲ IN THERE THE MORNING THEY FOUND OUT THAT CHILD HAD DIED

MEETING THAT MORNING

SAYING SORRY TO HIM  
HE JUST NODDED IN RESPONSE  
▲ WITH TRACY KRAMET

NO PASSWORD NEEDED TO GET INTO COMPUTER

NO STUDENT DISC PER EACH STUDENT IN LIBRARY

WE HAVE A STUDENT DISC --  
DON'T RECALL ▲ USING THAT STUDENT DISC

3/24/99

CHERYL METZGER

LOOKED ON HARD DRIVE  
FOUND HAMLET ESSAY ON COMPUTER

A QUESTION OF POWER -- BOOK OVERDUE  
BESSIE HEAD - (AUTHOR)  
WRITER FROM SOUTH AFRICA

VIRGINIA LOOKING FOR SIGN IN SHEETS  
REGULARS WEASEL THEIR WAY THROUGH.  
NOT WATCHED AS CLOSELY

STUDENTS DON'T NEED A PASS DURING LUNCH

REGULARS ARE:

▲ WAS A REGULAR  
NEVER PAID ATTENTION TO WHO HE SAT WITH

IMRAN AHMED WOULD SIT WITNESS HIM

1/13 -- CAN'T REMEMBER 1/13

DAY THAT DR. WILSON, AND POLICE OFFICER CAME TO SCHOOL AND  
ANNOUNCED BODY FOUND, KRAMER AND ▲ IN LIBRARY. I HUGGED  
HIM. SAID SO SORRY. HE JUST STOOD THERE

HE WAS DOING SOMETHING ON COMPUTER.


ALWAYS FRIENDLY  
QUIET, RESPECTFUL

COME TO LIBRARY -- THEY DON'T EAT IN CAFETERIA





## MEMORANDUM

TO: MCG  
FROM: KALI   
DATE: October 12, 1999  
RE: INTERVIEW WITH ADNAN SYED

---


On October 9, 1999, I met with Adnan at the Baltimore City Detention Center. Adnan and I reviewed the diary of Hae Min Lee.

**I. *I asked Adnan follow-up questions to the interview on October 6, 1999 (attached).***

(2) Adnan stated the assembly in school occurred in January. He was unsure if it was actually an assembly or a chance for persons to leave school a half day. Upon reflection Adnan stated it was an assembly.

Adnan stated Hae was upset that Jay would cheat on Stephanie because Hae had been cheated on before and was opposed to cheating. She thought that as Stephanie's best friend, Adnan should have told Stephanie what Jay had done. Adnan should not have covered for Jay. Hae had questioned Adnan if he and Stephanie were "only friends" or if there was something more.

(3) Adnan worked for Rural Metro Ambulance as a TECHNICIAN. Two persons rode in the ambulance, the driver and the technician. As the technician Adnan was responsible for making sure the oxygen was flowing; replacing the canister when necessary; checking the patient's vital signs; talking to the patient to get patient info, insurance info, medical history, family info, etc.

(5) Hae's phone number was (410) 602-5244. On January 12, 1999 Adnan called her at home and provided his new cell phone number. She was on the phone when he called. Adnan stated he called Hae from the Rite-Aid on Ingleside and Route 40 across from Westview Mall. 

(6) The picture Adnan provided for the picture frame as the gift for X-mas was the same as the picture on the cover of Adnan's binder of the Hae and Adnan together. Adnan describes light flirting as "friendly". He defines flirting as "dealings with a person, verbal or physical, that would exceed normal boundaries". He was unable to define 'normal boundaries' because he thought that was subjective and dependent on the relationship the people shared and their manner of communication. He provided examples of "flirting" as someone putting their arms around someone else, staring, smiling, etc. He actually wouldn't even call what he and Hae did as 'flirting'. He said it was nothing suggestive, just casual conversation, brotherly-sisterly conversation.



- (7) Relationship to Anne Benyora - Adnan does not know if Jay has family or friends in Rockville, but Jay does know people in Frederick, MD because on Adnan's cell phone that day were calls to Frederick MD that Adnan states were made by Jay.

**II. The meeting with Adnan continued with general questions.** He was uncomfortable with my announcement that I was there to review the diary with him. I began with the questions noted above, to allow him time to get comfortable with the fact that we were going to review the diary. We then discussed general information about Hae.

- (1) **Ex-boyfriends** Adnan had difficulty naming Hae's boyfriends.
- Kwa - her ex-boyfriend who is Vietnamese and works at Pep Boys near Howard County near the Giant on Route 40. He and Hae went out before Hae had moved to California. Hae broke up with him because he was pressuring her to have sex with him.
  - Michael - he lived in California and died in a car crash. He also had cancer. Hae told various accounts as to whether she was in the car with him when he died.
  - Jeff or Chris
  - Nick - named in the diary. was close friends with him. May have actually gone out but Adnan they thinks they were more or less "talking" and not formally boyfriend/girlfriend.
  - Jake - not a boyfriend, but a friend. He died in the summer of 1998. He attended college in Atlanta. He came to visit Hae. Hae did not mention that Jake had died until two weeks later. Hae's friends and Adnan discussed that it was weird that Hae had not mentioned when Jake died until a few weeks later. Jake is mentioned in the diary and at one point it says "JAKE CASSOL". She describes as the only person who really knew her.

- (2) **Relationship** Hae was not a virgin when Hae and Adnan first went out. She told various accounts of when she had lost her virginity. Once she said it was when she was in California in the ninth and tenth grade, once she said it was in middle school. Adnan said Hae had 1,2 or 3 prior lovers, other than Adnan. She would tell varying accounts. Adnan states they never really discussed it.

**Hae was Adnan's first lover.** They began dating the end of March 1998, beginning of April. Adnan asked Hae to attend the prom and gave his pager number to Hae. When I asked why he asked Hae to go to the prom versus anyone else, Adnan replied it was just someone who would go. Their friend Debbie was sitting by Adnan. She and Adnan were discussing the prom and Adnan stated he needed someone who would go. Debbie told Adnan that Hae would probably go. Debbie then ran outside and asked Hae if she would go to the prom with Adnan. Adnan states that he had never really noticed Hae before. Debbie ran in and said Hae would go to the prom. Adnan gave Hae his pager number. Hae eventually told Adnan that she always had a crush on him. Adnan states they just "hit it off" and started going out.

On the night of the prom, Adnan won Prom Prince and Stephanie won Prom Princess. They were dancing to one of Hae's favorite songs. Adnan danced a minute with Stephanie, the Prom Princess. He was supposed to dance the entire song with Stephanie, but because Adnan knew it was Hae's favorite song, he excused himself from Stephanie, left her on the dance floor, and took Hae out onto the dance floor. They kissed on the dance floor, but Adnan described that kiss as a peck.

The first time he *really* kissed Hae on the lips was on prom night when they had gone to the Inner Harbor in front of the Cheesecake Factory. Adnan says everyone knew they were going out. They were always together in school. Before practice they would go to the McDonald's together. They talked on the phone at night. They would go to the movies. The family pressure made it difficult to maintain a relationship. Adnan states that in the summer they had their ups and downs because they always had to cover up what they were doing because his parents did not know about Hae. Unlike Adnan's parents, Hae's mother would not have minded that Hae had a boyfriend but she wanted to meet the parents of the person Hae was dating. That was impossible. Therefore, Hae had to hide that she was dating Adnan from her mother and grandparents. Adnan describes Hae as always wanting to take a "recess" from their relationship. She always took breaks and then would call back a few days later and want Adnan back.

Adnan started to play football and work in the fall 1998 so the **amount of time he and Hae started spending together decreased**. He states that Hae was always getting on him about that. Then Hae began working at Lens Crafters and she was unable to spend time with him either.

I asked Adnan if he put pressure on Hae to not spend so much time with her friends but to devote more time to Adnan. Adnan stated just typical young relationship stuff. He would be playing basketball at the Mosque and she would get mad because he should be spending time with her. She would tell Adnan she had to stay in the house and then she would go to a girlfriends house. It was basically "tit for tat".

(3) **Sexual Encounters** Adnan and Hae would spend a lot of time in Adnan's car making out. There would be a lot of **foreplay**. Adnan describes foreplay as one person would be driving and the other person would tease the person who was driving with their hand. They would run their hands on the person's body above and below the person's waist and under the person's clothes.

**They first time they had sex was sometime between April 25 to May 10.** They would have sex off of Dogwood Road going to *Patapsco State Park*, where there is a little lake/pond and benches where people fish and the golf course is across from their spot. They also frequented the *Best Buy parking lot* next to Security Square Mall (this was their designated spot when school started).

**Hae initiated the sex.** He was uncomfortable and nervous initially. They used condoms initially, but later did not use condoms. He assumed she would get birth control, but they

never discussed it. On his birthday, May 21, Hae brought whipped cream and strawberries. Adnan describes this encounter as extremely messy.

They began having **oral sex**, both of them performed on the other, after they began having sex. Adnan does not remember how soon after they began having sex oral sex began. They had sex with Adnan on the bottom; Hae on top; or Adnan from behind. Adnan and Hae preferred Hae on top because it was easier due to mobility restrictions if you are in the car.

When I asked Adnan **how often they had sex**, "As often as possible" was Adnan's response. Out of the 7 days in a week, they probably had sex every time they had a chance to go somewhere or be together. On average they saw one another 4,5,6 times a week and had sex each of those days, about 2-3 times a day. Since Hae was responsible for picking up her niece after school, they would have sex in the Best Buy parking lot close to the school after school. Hae would leave to get her niece and they would see one another that night, when they would have sex again.

**Who knew they were having sex?** Adnan stated Saad knew everything. He did not tell his brother because he knows his brother would have been upset. He describes his brother as a practical person, a moral person. He states he is not religiously moral, but basically moral. He would think of the practical considerations of having sex with someone, i.e. pregnancy, sexually transmitted disease, etc. Adnan describes his relationship with his brother as "close".

Debbie also knew that Adnan and Hae were having sex. Hae told Debbie. Adnan would often ask Debbie how Hae described Adnan's sexual ability. Hae would occasionally mess with Adnan when Adnan asked if he was good after they had sex. She never outright said no, but teased him once when he did not ejaculate. Adnan states that once or twice he did not ejaculate, but on a few times Adnan "outlasted" Hae. Hae and Adnan stopped having sex the beginning of December because they had broken up. Hae and Adnan did not continue having sex after they broke up.

(4) **Other people** In October Adnan met Anjuli \_\_\_\_ at a party. She attends Bryn Mar College in Philadelphia. Adnan spoke with her on the telephone. Hae did not know Adnan was speaking with someone else. Adnan went to see Anjuli one day in Philadelphia and spent the day in her dorm room. They were in her bed. She had no clothes on, Adnan only had his shirt off. He and Anjuli fooled around. They kissed and Adnan teased her. Upon reviewing the diary Adnan stated that at that time he and Hae were both going their separate ways, he was talking to Anjuli, she was interested in Don.

### ***III. Adnan reviewed the diary. See Notations Attached.***

## MEMORANDUM

TO: MCG  
FROM: KALI   
DATE: January 15, 2000  
RE: INTERVIEW WITH ADNAN SYED

On January 15, 2000 I visited Adnan at the Baltimore City Detention Center. Adnan looked tired and stated he was ready for this trial to be over with – one way or the other.

He had concerns, actually points he wanted to make with regard to the first trial.

**OFFICER ADCOCK** Adnan stated Officer Adcock testified Adnan asked Officer Adcock if there was going to be a police report made. Adnan said their conversation was long. Officer Adcock did not merely inform Adnan that Hae was missing. Officer Adcock asked Adnan a series of questions, his address, his name, birthday, etc. It was only after Officer Adcock asked these series of questions that Adnan questioned if a police report was going to be made.

**NURSE** Adnan said she had been fired or let go or asked to leave Woodlawn because she was not performing her job well. Adnan also said he only spoke to the nurse 10-20 minutes the day it was announced to the school Hae was missing. On what basis could the nurse state Adnan was “faking” when she had no basis on which to judge Adnan’s state of mind.

**DEBORAH WARREN** She testified as to a note from October or November where Adnan and Aisha were writing back and forth to one another. Adnan said the part about kill looks like his writing. Aisha and Adnan were in Health class writing this. Health class is about 1-1 1/2 hours long. He cannot remember what they were writing about, but knows it had something with Hae being sick in the morning and the speculation about her being pregnant. She also stated Adnan was possessive – that he did not want her to be around other guys. Adnan does not know why she would say that. He wondered if she could give specific examples of how this was. I guess also why this behavior would be any different from Hae being upset about girls sitting on his lap, etc.

Also when Hae disappeared Deborah stated that she did not come back home and Deborah knew where she was. Deborah told Aisha, Krista Meyers that she knew where Hae was and that she was going to try to get in touch with her. Apparently Deborah implied Hae was with Don.

**TRACK** Adnan ran in the county championship in the 300meter race after January 13, 1999. He received his track medal in November. Hae was the person who put the medal over his rear view mirror and he left it there. The medal was still placed in his car like that when he was arrested. He wants to point out that Tina questioned whether he was a scholar-athlete. He would not formally be considered one, nor would he himself consider himself to be one. The persons in school recognized as scholar-athletes were so recognized in formal ceremonies at school.

**JAY WILDS**

- (1) When Hae left school she left by herself, as noted by Butler. Butler said she saw her by herself. Where was Adnan?? If he was with Hae or had broken into her car at school someone would have seen him because the school day had ended and people were outside. Both Adnan and Hae were in Psychology class from 12:45-2:15. That is when school ended.  
Jay allegedly met him at the Best Buy parking lot around 3:30.  
So how did Adnan get into her car or have Hae meet him, kill Hae, pick her up drag her from the car to the trunk (how could he lift her??) between 2:15 and 3:30 with noone seeing him. Where in the Best Buy parking lot did this allegedly take place?? If Jay said it occurred on the side where they would have sex, Adnan would not then walk all the way to the phone booth (it is a long walk and Adnan does not like walking).
- (2) Do we have the videotapes from Best Buy and Westview??
- (3) If Adnan threw the red gloves away before he got into the car and drove all around town as Jay testified then why were his fingerprints not all over the car?? I questioned Adnan how he knew about the red gloves before they were ever mentioned or we were ever made aware of them?  
Adnan stated that when he was arrested the police told him they knew about the shovels he discarded; the red gloves; the plans; the phone calls; his throwing up and his fingerprints were all over the car.
- (4) Adnan said his fingerprints were on the cover of the map. He has flipped through that map a hundred times when he would be driving with Hae when they were downtown because they would always get lost. If his fingerprints were on the cover why were they not on the Leakin Park page?
- (5) Adnan said the assembly in which he convinced Stephanie not to go Jay's house was in late October or November. Jay was spending time with "ghetto white girls". He told Hae because they were together at the time and Stephanie was so devoted to Jay that she had talked about not going to college and possibly staying with Jay and renting an apartment. This upset Adnan because he knew Jay was crazy about Stephanie and liked her being his girlfriend, but he did not treat her right.
- (6) Adnan describes Jen as a good friend with Jay. He was always with her when he was not with Stephanie, but Jay never spent time with Jen and Stephanie together. He wouldn't be surprised if they slept together, but he doesn't think so. She's "butchie looking", i.e. a tomboy, with guys lots.

**DESCRIPTION** When I asked Adnan to describe himself in 10 words, he said:

Pakistani; his age; Muslim; light skinned (not white); dark hair; dark eyes; slender; 6'0 tall; wears glasses (except when he is home); and educated.

He would not describe himself as Arab. If he had to chose a box he would chose either Middle Eastern or Asian American or other. He would also describe himself as Indian, if people have not heard of Pakistan and wanted to know what it was near.

# ATTACHMENT 10

1. Detective Notes, Inez Butler Interview, March 23, 1999 (2 pages) (B-0191, B-0193)
2. Police Report of Investigation, February 14, 1999 (1 page) (B-0006)
3. Trial Testimony of Debbie Warren, February 17, 2000 (4 pages)
4. Handwritten Defense Notes, undated (1 page) (A-0775)



3/23/99

1:20 - 2:03 INEZ BUTLER  
GYM TEACHER

DETECTIVE  
QUESTION: WHEN  
DURING THE DAY  
DO YOU SEE EITHER  
HAE / ADNAN OR  
BOTH?

DON'T HAVE EITHER IN MY CLASS  
SEE ▲ EVERYDAY DURING  
LUNCH GOING TOWARD LIBRARY. HANG WITH  
ASSOCIATES UPSTAIRS BY NEWSSTAND AREA  
DID NOT SEE V/▲ TOGETHER THAT DAY

SAW ▲ IN BUILDING EARLIER THAT DAY.

DIDN'T SEE HAE UNTIL LUNCH. SHE WAS TAPING FOR CHANNEL  
36. AIRED ONE WEEK LATER.

MY CLASS IN ROOM 214, PUSH CART TO GO INTO CLASSROOM. USE  
HALLWAY TILL HALLWAY CLEARED. SAW ▲ 2ND PERIOD. HE  
HAD MS. EFRON FOR ENGLISH.

REMEMBER BECAUSE HE'S ONE OF THE ONES THAT I HAVE PULLED  
HIS SCHEDULE ON. (TO SEE WHERE HE IS SUPPOSED TO BE)  
REMEMBER WHAT SHE HAD ON

BECAUSE HER SKIRT WAS SHORT

SHE PUT \$ IN CASH BOX HERSELF.

TEACH PSAT/ SAT -- HOW TO TAKE THE TEST

2ND PERIOD -- 9:15 - 10:40

\*\*DON'T REMEMBER SEEING THEM AT LUNCH

USUALLY SAME GROUP THERE

HAE KNEW I HAD TO LEAVE AT 2:45

BELL RINGS 2:15. SHE GOES GETS CAR

UP HERE BETWEEN 2:20 - 2:25, AS SOON AS THE BUS LOOP  
CLEARS

SHE'S UP IN FRONT OF THE SCHOOL.

HAE KEEPS CAR RUNNING. KEYS IN CAR

RUNS BEHIND COUNTER

VERY FINE APPLE JUICE / HOT FRIES

WE FUSS -- TOLD HER TO GO HOME AND CHANGE CLOTHES

SHE SAID SHE HAD TO PICK COUSIN UP BEFORE SHE COULD GO TO  
WORK,

(DID WE FIND A JUICE

BOTTLE OR FRY BAG

IN CAR PER SGT. LEHMAN) ?

MY CHILD'S BELL RINGS AT 2:45

I LEFT AT 2:45. COULD HAVE BEEN CLOSER TO 2:50

COULDN'T BE CLOSER TO 2:15 BECAUSE:

2:25 BUSES LEAVE

2:30 SHE JUMPS FROM CAR

SHE DIDN'T WANT TO WAIT WITH OTHERS

SO SHE JUST RAN BEHIND COUNTER

ALICE SAID HAE IS LATE COMING BACK TODAY.

I KNOW EVERYONE DID NOT SEE HIM (▲) IN GYM AREA THAT DAY.

"DO YOU STILL RUN TRACK?"

## BALTIMORE COUNTY POLICE DEPARTMENT

B - 0006

CONFIDENTIAL

## REPORT OF INVESTIGATION

NAME OF SUBJECT WARREN, DEBBIE	DATE SUBMITTED 02/14/99
	TYPE OF INVESTIGATION LEE MISSING PERSON 99-013-1074

NOTICE: THE INFORMATION CONTAINED IN THIS REPORT IS HIGHLY  
CONFIDENTIAL. DISSEMINATION OF INFORMATION TO ANY PERSON  
WITHOUT A NEED TO KNOW IS STRICTLY FORBIDDEN.

## REPORT OF FINDINGS:

INTERVIEWED: WARREN, DEBBIE

BLACK FEMALE, DOB [REDACTED]  
[REDACTED]

BALTIMORE, MD 21228

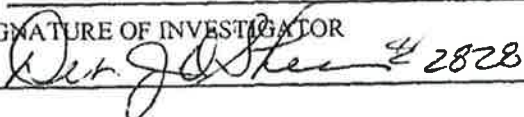
TELEPHONE [REDACTED]

RELATION: SCHOOLMATE AND FRIEND OF HAE LEE

On 01/28/99 the assigned interviewed Debbie Warren. Debbie said she saw Hae at approximately 1500 hours on 01/13/99. Hae was by herself and she was inside the school near the gym. Hae told Debbie that she was going to see Donald at the mall. Debbie did not see Hae leave the school.

Debbie said Hae was excited about her relationship with Donald Clinedinst. Hae would fight with her mother, but it was nothing serious enough to make her leave.

SIGNATURE OF INVESTIGATOR

#2828

NAME OF INVESTIGATOR

Detective J. O'Shea #2828

923-00  
28835  
27

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

STATE OF MARYLAND

COPY

VERSUS INDICTMENT NOS. 199103042, 43, 45, 46

ADNAN SYED

/ FEBRUARY 17, 2000

REPORTER'S OFFICIAL TRANSCRIPT OF PROCEEDINGS

BEFORE:

THE HONORABLE WANDA HEARD, JUDGE  
AND A JURY

APPEARANCES

ON BEHALF OF THE STATE:

KEVIN URICK, ESQUIRE  
KATHLEEN MURPHY, ESQUIRE  
ASSISTANT STATE'S ATTORNEYS

ON BEHALF OF THE DEFENDANT:

M. CRISTINA GUTIERREZ, ESQUIRE

RECORDED BY: VIDEO TAPE

TRANSCRIBED BY:  
Diane R. Walker  
Official Court Reporter

Office of the Attorney General  
200 St. Paul Place 21202  
Baltimore, MD  
Attention: Tina Stavrou  
410-576-6491

Please return by: 8-04-10

CRIMINAL APPEALS  
DIVISION

RECEIVED  
SEP 11 2000  
OFFICE OF

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ENTERED

SEP 11 2000

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INDEX

DEBBIE WARREN

CROSS EXAMINATION BY MS. GUTIERREZ PAGE 5

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RECROSS EXAMINATION BY MS. GUTIERREZ PAGE 141

DETECTIVE GREGORY MACGILLIVARY

DIRECT EXAMINATION BY MR. URICK PAGE 152

CROSS EXAMINATION BY MS. GUTIERREZ PAGE 160

1 Q And you took that inquiry seriously, did  
2 you not?  
3 A Yes.  
4 Q You tried hard to search your brain to  
5 recollect the best that you could, did you not?  
6 A Yes.  
7 Q About anything Hae might have said?  
8 A Yes.  
9 Q Or that you might have seen?  
10 A Yes.  
11 Q Is that right? And you were asked about if  
12 you had seen her, right?  
13 A Yes.  
14 Q And you recalled then and then was January  
15 28th?  
16 A I don't know.  
17 Q If Detective O'Shea wrote up a report that  
18 said he spoke to you on January 28th, about three  
19 weeks, two and a half weeks after she disappeared,  
20 that would be about right, would it not?  
21 A Probably.  
22 Q Okay. And you did speak to him?  
23 A Yes.  
24 Q At school?  
25 A Yes.



1 Q You answered all of his questions?  
2 A Yes.  
3 Q You volunteered any information that you  
4 thought might be relevant?  
5 A Yes.  
6 Q And you saw him taking notes of that?  
7 A Yes.  
8 Q And you recall that you told him like you  
9 told us yesterday that you saw Hae at about three  
10 o'clock?  
11 A Yes.  
12 Q And that where you saw her she was by  
13 herself?  
14 A Yes.  
15 Q And she was near the gym?  
16 A Yes.  
17 Q And you were asked what, if anything, did  
18 she say to you?  
19 A Yes.  
20 Q And at the time on January 28th you told  
21 Detective O'Shea that Hae told you that she was going  
22 to see Donald at the mall?  
23 A Yes.  
24 Q You wouldn't have told them -- him that  
25 unless it was true?

How did Adnan get in  
Hae's car

Debbie Warren  
saw Hae at 3:00 pm

---

Hae recognizes Adnan's car

even if Jay was  
driving

Jay describes himself as very high  
Strip = where drugs sold.

Jay = I couldn't bury her.

There are 2 TAPES

Jay admits to Drug Trafficking  
& Disposal

Mrs Prepped

# ATTACHMENT 11

1. Correspondence from Syed's Parents, March 30, 2000 (1 page) (Ex. 6)

Mr. and Mrs. Syed Rahman  
7034 Johnnycake Road  
Baltimore, Maryland 21207

Christina Gutierrez  
Redmond & Gutierrez, P.A.  
1301 Fidelity Building  
210 North Charles Street  
Baltimore, Maryland 21201

March 30, 2000

Dear Ms. Gutierrez,

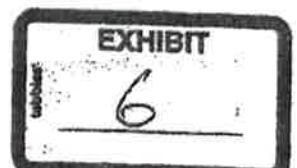
We would like for you to include in the motion for new trial the newly discovered evidence provided by Ms. Asia McClain. We are aware that under Maryland laws, the evidence is considered newly discovered only when it is indeed newly discovered. We feel, however, that Asia's information falls into a gray area because in fact no body contacted her for her story, and that until now her story was undiscovered. Attached please find a copy of an affidavit signed and sworn to by Ms. Asia McClain. According to her, the other two eyewitness alibis are also willing to submit affidavits.

Furthermore, for sentencing we would like to have mitigating witnesses address the court. Please contact us to arrange for this.

Thank you,

A handwritten signature in dark ink, appearing to read "Syed Rahman", followed by a horizontal line.

Mr. and Mrs. Syed Rahman



# ATTACHMENT 12

1. Instructions to the Jury, February 25, 2000 (4 pages)
2. Billing Summary for Adnan Syed, 3/2/99 - 3/31/99 (1 page) (A-0374)
3. Defense Investigator Note, September 3, 1999 (1 page) (A-0359)
4. Trial Testimony of Jay Wilds, February 4, 2000 (3 pages)
5. Defense Memo to Gutierrez, August 25, 1999 (1 page) (A-0153)
6. Detective Notes, Nisha Tanna Interview, April 1, 1999 (2 pages) (B-0138, B-0140)
7. Defense Investigator Note, March 11, 1999 (1 page) (A-0360)
8. Trial Testimony of Yaser Ali, February 3, 2000 (5 pages)
9. Trial Testimony of Sharon Watts, December 13, 1999 (5 pages)
10. Statement by Judge Wanda Heard at Sentencing, June 6, 2000 (2 pages)

923-00  
33835

IN THE CIRCUIT COURT FOR BALTIMORE CITY  
(PART 9)

STATE OF MARYLAND

\*

v.

\* CASE NO. 199103042, 43, 45, 46

ADNAN SYED

\*

Defendant

\*

/\*

BALTIMORE, MARYLAND  
FRIDAY, FEBRUARY 25, 2000

(TRIAL ON THE MERITS)

BEFORE:

THE HONORABLE WANDA K. HEARD, ASSOCIATE JUDGE

(AND A JURY)

APPEARANCES:

FOR THE STATE:

KEVIN URICK, ESQUIRE  
KATHLEEN C. MURPHY, ESQUIRE

FOR THE DEFENDANT:

CRISTINE GUTIERREZ, ESQUIRE

RETURN TO:

Office of the Attorney General  
200 St. Paul Place  
Baltimore, MD 21202  
Attention: Tina Stavrou  
410-576-6491

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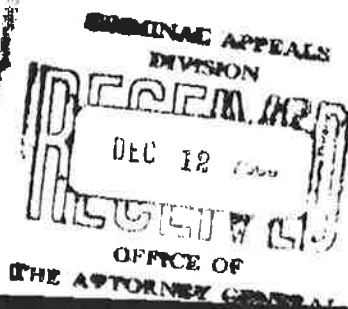
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BALTIMORE, MARYLAND 21202

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8-04-10



ENTERED

DEC 12 2000



I N D E X

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1           You need not believe any witness, even if the  
2       witness's testimony is uncontradicted. You may believe  
3       all, part or none of the testimony of any witness.

4           Now, there was expert witness testimony given in  
5       this case. An expert is a witness who has special training  
6       or expertise in a given field. You should give expert  
7       testimony the weight and value you believe it should have.  
8       You are not required to accept any expert opinion. You  
9       should consider an expert's opinion together with all other  
10      evidence in the case.

11          The weight of the evidence, as I've indicated  
12      previously, does not depend on the number of witnesses on  
13      either side. You may find that the testimony of a smaller  
14      number of witnesses for one side is more believable than  
15      the testimony of a greater number of witnesses on the other  
16      side.

17          The Defendant, Mr. Syed, has an absolute  
18      constitutional right not to testify. The fact that  
19      Mr. Syed did not testify must not be held against him. It  
20      is not to be considered by you in any way, or even  
21      discussed by you.

22          The mere presence of a person at the time and  
23      place of the commission of an offense is not by itself  
24      sufficient to establish his guilt but may be considered  
25      with all the other surrounding circumstances. Evidence has

1    been presented at this case that the Defendant was not  
2    there when the crime was committed. You should consider  
3    this evidence along with all other evidence in the case.  
4    Thus, in order to convict the Defendant, the State must  
5    prove beyond a reasonable doubt that the crime was  
6    committed and that the Defendant committed it.

7            You've also heard testimony from a witness, Jay  
8    Wilds, who may have been an accomplice. An accomplice is  
9    one who knowingly and voluntarily cooperated with, aided,  
10   advised or encouraged another person in the commission of a  
11   crime. If you are not convinced that Jay Wilds was an  
12   accomplice, you should treat that testimony as you would  
13   treat the testimony of any other witness. On the other  
14   hand, if you are convinced that Jay Wilds was an  
15   accomplice, then you must decide whether that testimony was  
16   corroborated before you may consider it. The Defendant  
17   cannot be convicted solely on the uncorroborated testimony  
18   of an accomplice. However, only slight corroboration is  
19   required. This means there must be some evidence in  
20   addition to the testimony tending to show either that, one,  
21   the Defendant committed the crime charged or, two, that the  
22   Defendant was with others who committed the crime at the  
23   time and place that the crime was committed.

24            If you find that the testimony of Jay Wilds has  
25   been corroborated, it should be considered with caution and

**Billing Summary for Adnan Syed**

The following is a summary of the man-hours and miles used to investigate this case while Attorneys Doug Colbert and Chris Flohr were Adnan's council.

**Total Hours: 39.75    Total Miles: 582**

1. 3-2-99 3.0 hours 62 miles-First meeting
2. 3-3-99 1.75 hours 18 miles – met with attorneys and met Mr. Syed
3. 3-3-99 4.0 hours 41 miles – drove the area of Woodlawn High and Leakin Park, Balt. Co. Library, interviewed Wackenhut Off. Steven Mills, interviewed Coach Michael Sye
4. 3-4-99 6.0 hours 49 miles-met and interviewed Adnan
5. 3-8-99 3.5 hours 104 miles- phone conversation with Mr. Flohr and interview with Nisha Tanna
6. 3-10-99 5.50 hours 85 miles – interviewed Stephanie McPherson and Yaser Ali, responded to Adult Boutique and picked up phone list
7. 3-11-99 2.50 hours 41 miles- Woodlawn Sr. High for Memorial Service and re-interviewed Steph
8. 3-15-99 .50 hours phone conversation with cell phone company
9. 3-16-99 5.0 hours 82 miles – met with Mr. Colbert, Lens Crafters interview, Saad Chaudry interview
10. 3-22-99 3.0 hours 39miles- Rebecca Walker interview
11. 3-23-99 2.0 hours 22 miles- Mr. Flohr meeting and re-visit Boutique
12. 3-30-99 .50 hours – conversation with Becky Walker about letter for Bail Review
13. 3-31-99 1.5 hours 39 miles- picked up letter and met with Attorneys about Bail Review

**ATTORNEY WORK PRODUCT**

**On September 3, 1999 PD Davis spoke to Jay Wilds at his residence on the telephone. Jay refused to talk to PD Davis about this investigation.**

923-00  
19835

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

STATE OF MARYLAND,

vs.

Indictment No. 199103042-46

ADNAN MASUD SYED,

Defendant.

REPORTER'S OFFICIAL TRANSCRIPT OF PROCEEDINGS  
(Trial on the Merits)

Baltimore, Maryland

Friday, February 4, 2000

BEFORE:

HONORABLE WANDA KEYES HEARD, ASSOCIATE JUDGE  
(and a jury)

APPEARANCES:

For the State:

KEVIN URICK, ESQ.  
and  
KATHLEEN C. MURPHY, ESQ.

For the Defendant:

M. CRISTINA GUTIERREZ, ESQ.

RETURN TO:  
Office of the Attorney General  
200 St. Paul Place  
Baltimore, MD 21202  
Attention: Tina Stavrou  
410-576-6491

Please return by: 8-04-10

BRENDA D. TROWBRIDGE  
Official Court Reporter  
CRIMINAL APPEALS  
DIVISION  
141 North Calvert Street  
Baltimore, Maryland 21202

MAR 15 2001

OFFICE OF  
THE ATTORNEY GENERAL

ENTERED

MAR 15 2001



1	T A B L E O F C O N T E N T S			
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1 purchased it where again?

2 A In Forest Park.

3 Q Where did you go after that?

4 A We turned and I believe at this time he wanted  
5 to get back to track practice because he said he needed  
6 to be seen. This is when we started to talk a little  
7 bit. I don't know, he said to me it kind of hurt him but  
8 not really, and when someone treats him like that, they  
9 deserve to die. How can you treat somebody like that,  
10 that you are supposed to love? And then, all knowing is  
11 Allah.

12 Q Did he explain what he meant by that?

13 A No. And then his last statement was mother-  
14 fuckers think they are hard, I killed somebody with my  
15 bare hands. That's what he said to me. Then he got out  
16 of the car.

17 Q Did he describe the act at all?

18 A Yes. He said that he thought she was trying to  
19 say something to him like apologize or say she was sorry,  
20 and that she had kicked off the turn signal in the car,  
21 and he was worried about her scratching him on the face  
22 or something like that he was saying. But other than  
23 that, that was all of the actual act.

24 Q Did he say why he might be worried if he got  
25 scratched on the face?

## MEMORANDUM

TO: MCG  
FROM: KALI (L)  
DATE: AUGUST 25, 1999  
RE: INTERVIEW WITH ADNAN SYED

---

On August 21, 1999, I met with Adnan at the Baltimore City Detention Center to discuss the filming in the detention center on August 17 or 18, 1999.

Adnan stated the filming aired on the 6 p.m. news on Channel 2 on August 20, 1999. He stated that the news showed his hands, his t-shirt, and his shorts. There was no footage of his cell. Adnan stated that what was aired did not distinguish him at all and only he was able to recognize himself because he knew what he had on.

He stated that the "goon squad" has random shake-downs for contraband/knives, etc. They are in full gear and place the inmates in handcuffs, remove the inmates from their cells and search the inmate and the cell. This is the standard "shake-down" procedure according to Adnan in which the "goon squad" goes from cell to cell. Nothing was found in Adnan's cell during the shake-down, nor has there ever been anything found in his cell.

#### Information regarding Jay Wilds

Adnan states he has known Jay since 7th grade. Jay was in the 8th grade and Adnan was in the 7th. They attended Johnnycake Middle. They did not hang out together, but began to do so in Fall 1998 because of Stephanie. Jay provided Adnan with weed. He paid for it sometimes, but usually not because Jay always had weed. Adnan states he smoked with Jay less than 10 times.

#### Information regarding January 13, 1999

States he believes he attended track practice on that day because he remembers informing his coach that he had to lead prayers on Thursday. Hae's brother called Adnan on his cell phone. He initially asked for Don (thinking it was the current boyfriend's number) and then realized it was Adnan. He asked if Adnan had seen Hae and then a police officer got on the phone. Adnan does not remember where he was when Hae's brother called, but he believes he was in his car with Jay. He states he keeps his cell phone in the glove compartment and recalls reaching over Jay to get the phone from the glove compartment.

*Provided a handwritten account of his recollection of his whereabouts on Jan 13 and his efforts in ensuring Hae had a proper memorial service. (ATTACHED)*

4/1/99

DET. RITZ

6:55

NISHA TANNA

DOB [REDACTED]

SHERWOOD HIGH SCHOOL -- 12TH GRADE

MET DEFENDANT THROUGH:

LAKSHMI GURUSWAMY

LIVES: ELLICOTT CITY

N.Y.E. PARTY --

PARTY STARTED APPROXIMATELY 8-9P

A LOT OF PEOPLE: 100 OR MORE

STAYED AT PARTY UNTIL APPROXIMATELY 1A

MET ▲ AT PARTY -- INTRODUCED. DIDN'T REALLY TALK

AROUND MIDNIGHT STARTED TALKING WITH ▲.

EXCHANGED # AND

DANCED. INTRODUCED BY LAKSHMI

▲ SAID HE LIVED IN BALTIMORE. HE INTRODUCED ME TO HIS

FRIENDS

NEVER CALL ▲ AT HIS HOUSE

NEVER ARRANGED A DATE. MENTIONED HE WOULD TAKE ME TO  
MOVIES.

REMEMBER WHEN ADNAN GOT A CELL PHONE

THINK IT WAS MID-JANUARY WHEN HE GOT IT  
HE FIGURED IT WOULD BE EASIER TO CALL ME ON CELL  
PHONE

THINK IT WAS AROUND TIME WHEN HE 1ST GOT CELL PHONE;  
HE HANDED PHONE TO JAY TO TALK TO ME

THOUGHT JAY WAS WHITE  
JAY DIDN'T SEEM FRIENDLY

DEFENDANT JUST GOTTEN TO JAY'S STORE -

THEY WERE JUST TALKING. DEFENDANT SAID 'HI WHAT'S UP'

I SAID 'HI' TO JAY

**\*\*DAY OR TWO AFTER HE GOT CELL PHONE**

THINK ▲ WENT IN THE STORE TO SAY HI WHEN ▲ WAS  
VISITING JAY

IT WAS MAYBE A MINUTE

JAY DID NOT ASK ANY QUESTIONS

CONFIDENTIAL

Private Detective Andrew Davis responded to the Woodlawn Senior High School Gymnasium for a memorial service held in honor of Hae Min Lee scheduled for 2:30. During the ceremony, Aisha Pittman, Debbie Warren and Becky Walker all spoke in reference to the special memories they had of Hae Min Lee. Becky Walker in her speech advised that she was Hae's best friend and read an e-mail that Hae had sent her during the summer of 1998 in reference to the hard times Becky was going through in losing a loved one. Debbie Warren stated that Hae confided in her more than anyone else and Aisha Pittman said that Hae was her best friend, like a sister to her.

After the ceremony, PD Davis was able to re-interview Stephanie McPherson. Ms. McPherson advised PD Davis that she now remembers speaking to Jay and Adnan on January 13, 1999 between 4:15 and 5:30 p.m. She advised that she called Adnan on his cell phone and Jay was with him at the time. Ms. McPherson advised that she was at Parkville High School waiting to play her basketball game and was bored so her and some fellow teammates began to make phone calls. Again, she believed it was between 4:15 and 5:30 p.m. She could not provide any other information about where Adnan and Jay were nor what they were doing.

PD Davis was also able to obtain a tag number of CJH-186 displayed on a Toyota Camary which appeared to belong to Hae's grandfather.



923-00  
18035

IN THE CIRCUIT COURT FOR BALTIMORE CITY

STATE OF MARYLAND

\*

v.

\* CASE NOS. 199103041-46

ADNAN MASUD SYED,

\*

Defendant

\* \* \* \* \*

( TRIAL ON THE MERITS )

THURSDAY, FEBRUARY 3RD, 2000

BALTIMORE, MARYLAND

BEFORE:

THE HONORABLE WANDA KEYES HEARD, ASSOCIATE JUDGE  
(And a Jury)

APPEARANCES:

For the State:

KEVIN URICK, ESQUIRE  
KATHLEEN C. MURPHY, ESQUIRE

For the Defendant:

CRISTINA GUTIERREZ, ESQUIRE

BRENDA D. TROWBRIDGE  
OFFICIAL COURT REPORTER  
533 COURTHOUSE EAST  
111 NORTH CALVERT STREET  
BALTIMORE, MARYLAND 21202

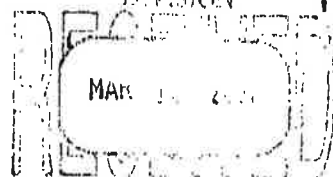
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200 St. Paul Place  
Baltimore, MD 21202  
Attention: Tina Stavrou  
410-576-6491

Please return by:

8-04-10

CRIMINAL APPEALS  
DIVISION



THE ATTORNEY GENERAL

1 the record.

2 THE WITNESS: Y-a-s-e-r, A-l-i.

3 THE CLERK: And state your address for the  
4 record.

5 THE WITNESS: 3509 Char Lil Court, Ellicott City,  
6 Maryland 21042.

7 DIRECT EXAMINATION

8 BY MR. URICK:

9 Q Good afternoon, Mr. Ali.

10 A Good afternoon.

11 Q Do you know the defendant?

12 A Yes.

13 Q How long have you known him?

14 A Seven or eight years.

15 Q How would you describe your relationship with the  
16 defendant?

17 A He's a best friend.

18 MR. URICK: If I may approach the witness at this  
19 time?

20 THE COURT: Yes, you may.

21 (State's Exhibit Number 34, listing of  
22 calls, marked for identification).

23 BY MR. URICK:

24 Q Mr. Ali, I am now going to show you a copy of  
25 what's been marked for identification purposes as State's

1 Exhibit 34. Would you ever communicate with the defendant?  
2 A Yes.  
3 Q What sort of phones did he have, if you know?  
4 A What sort of phones?  
5 Q Yes.  
6 A He had a cellphone.  
7 Q Do you remember its number?  
8 A Not now, but at the time I'm sure I did know the  
9 number.  
10 Q Now, I'd like you to look at the top of this  
11 sheet. Do you see name of the service user --  
12 A Yes.  
13 Q -- for this cellphone number? Now, if you would,  
14 starting at the top and going down, look at line 13.  
15 A Uh-huh.  
16 Q Have you found line 13?  
17 A Yeah.  
18 Q And there's a number beside, in the every next  
19 row after the call, Number 13. Can you identify that  
20 number?  
21 A That number is my number.  
22 Q And when you say your number, is it a residence  
23 number or a cellphone number?  
24 A My cellphone number.  
25 Q Would you read that for the record, please?

1           A     Sure. Number 13, 410-340-7374, call --  
2           Q     Did the -- I'm sorry. Did I cut you off? Were  
3     you saying something else?  
4           A     I was going to read the call time.  
5           Q     Okay. The time of the call was?  
6           A     6:59 p.m.  
7           Q     And the duration?  
8           A     27 seconds.  
9           Q     Do you see above, it says that these are the  
10    calls made on January 13th of 1999. Do you have any  
11    independent recollection of receiving a call on your  
12    cellphone at 6:50 --  
13          A     9.  
14          Q     -- 9 on January 13th?  
15          A     No.  
16          Q     Do you have any independent recollection of where  
17    you might have been at that time on January 13th?  
18          A     Yeah. Either home, either sleeping or doing  
19    homework, or I could have been at the Mosque, going to the  
20    Mosque.  
21          Q     What, if anything, would have been going on at  
22    the Mosque at that time?  
23          A     There would be tarawee prayers.  
24          Q     And those are?  
25          A     And those are prayers that you do at the month of

1       Ramadan.

2               MR. URICK: With the court's permission, at this  
3 time on Line 13 in the blank space, I'm going to write in  
4 Yaser Ali's cellphone.

5               THE COURT: Any objection, M's Gutierrez?

6               MR. GUTIERREZ: No, Your Honor.

7               BY MR. URICK:

8               Q     What were the dates of Ramadan back in '98 and  
9 '99 if you remember?

10              A     It was during the winter, somewhere in December  
11 and January.

12              Q     Does it have a set number of days each year?

13              A     29 to 31 days.

14              Q     Now, if you would, look at line 3.

15              A     Uh-huh. Yes.

16              Q     Have you found line 3?

17              A     Yeah.

18              Q     Do you recognize that number?

19              A     Yeah, that's my number.

20              Q     And will you read it for the record, again?

21              A     410-340-7374. Call time?

22              Q     And what -- yes. What time did it occur?

23              A     10:00, what time -- yeah, 10:00 o'clock to 10:02,  
24 44 seconds, and call duration was six seconds.

25              MR. URICK: At this time, with the court's

81282 50  
923-00  
7835

STATE OF MARYLAND

\* IN THE

Plaintiff(s)

\* CIRCUIT COURT

vs.

\* FOR

ADNAN SYED

\* BALTIMORE CITY

Defendant(s)

\* Case No.: 199103042, 43, 45 & 46

\* \* \* \* \*

**TRANSCRIBER'S OFFICIAL TRANSCRIPT OF PROCEEDINGS**  
(Trial)

BEFORE: THE HONORABLE WILLIAM QUARLES

HEARING DATE: December 13, 1999

APPEARANCES:

FOR THE PLAINTIFF: KEVIN URICK, ESQUIRE  
KATHLEEN MURPHY, ESQUIRE

FOR THE DEFENDANT: CHRISTINA GUTIERREZ, ESQUIRE

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410-576-6491

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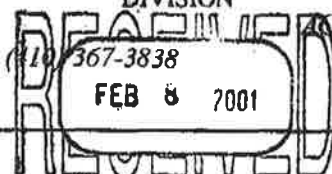
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VOLUME II OF II

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DIVISION



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THE ATTORNEY GENERAL



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Detective Joseph O'Shea	DIRECT
	CROSS
Inez Butler-Hendricks	DIRECT
	CROSS
Donald Cliendienst	DIRECT
	CROSS
Lynette Woodley	DIRECT
	CROSS
	REDIRECT
Sharon Watts	DIRECT - VOIR DIRE
	CROSS - VOIR DIRE
	DIRECT
	CROSS
Sharon Talmadge	DIRECT
	CROSS
	REDIRECT
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Krista Meyers	DIRECT
	CROSS
	REDIRECT
Deborah Warren	DIRECT
	CROSS
	REDIRECT

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## STATE'S EXHIBITS

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(410) 367-3838

FAX: (410) 367-3883

1 send them home, or do what we needed to.

2 Q. Did you have occasion to see the Defendant that day?

3 A. Yes, I did. The first time, I saw Adnan was in the hallway right outside the  
4 health suite door and he was just standing there. And he really wasn't talking, he wasn't  
5 funning - - he was just standing there. And I really wasn't concerned about Adnan at that  
6 point because there were a lot of students coming into crisis, and they were crying, and  
7 they were upset, and some were angry, and the atmosphere was very, very charged. And  
8 Adnan was just standing outside of the door. And after about 10 minutes, a teacher came  
9 and said that she was very, very concerned that Adnan wasn't talking, he wasn't moving,  
10 and seemed to be unable to be reached - -I can't remember her exact words - - but that  
11 nobody could reach him. Then this other psychologist from the crisis team came in - -  
12 Dwayne - - and was very concerned, too, that he's tried to see Adnan and some other  
13 people had tried to talk to Adnan. Again, he was not responding. So at that time, I went  
14 out in the hall, and Adnan with some friends, and I put my arms around Adnan, and said  
15 "Adnan, come with me. We're going to go back in my health suite." I brought Adnan  
16 back in the back room in the examination room and sat him down in a chair. And it was  
17 just, at that point, he and I. And I began to talk to Adnan and finally he did then begin to  
18 speak.

19 Q. When you first saw him, how did he appear?

20 A. He appeared shocked. His eyes were big. He was mute. He wasn't talking.  
21 He wasn't crying. He was just absolutely stone still.

22 Q. What is a catatonic state?

23 A. That's pretty much what I just described. A person being unable to express  
24 any emotion, any activity, and just almost freeze in time. As if a frame has been frozen. A  
25 catatonic state - - that person freezes and doesn't progress or doesn't regress, just stays in

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1 one -- one frame of mind in one position.

2 Q. Have you had much occasion to counsel people in times of grief?

3 A. Absolutely. I have to do a lot of that in my job.

4 Q. Are there any other symptoms of catatonic state besides the ones that you  
5 listed there?

6 A. It usually is an extended period of time. Catatonic state also usually does not  
7 remedy itself to just brief counseling. It usually needs a psychotherapeutic approach and  
8 sometimes it needs medication or different treatments. It usually doesn't just rectify itself  
9 with a brief counseling one episode.

10 Q. Was there anything about the Defendant's symptoms that did not conform  
11 with a catatonic state?

12 A. Absolutely. As soon as I touched Adnan and started to walk him into the  
13 health suite, the look changed. The eyes weren't so big. His posture wasn't so erect. He  
14 walked easily. He didn't need any leading. He walked into the health suite into the back  
15 room and sat of his own volition. There was no intervention on my part, at that point,  
16 except touching him and saying "come on, Adnan, we need to talk." And just with that  
17 alone, his supposedly catatonic appearance changed.

18 Q. And based on your expertise and training, did you form any opinion at that  
19 time?

20 A. My opinion was that this was a very contrived emotion -- very, very  
21 rehearsed -- very insincere.

22 Q. Now did you talk to him that day?

23 A. Yes, I did.

24 Q. What, if anything, did he tell you?

25 A. When he first sat down, I began and I said "Adnan, I know this must be

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1 really hard. I know you loved Hae Lee. I know she's gone and that this is very hard on  
2 you." And not quoting, but this was the context, that how could I be sure it was Hae Lee?  
3 I said "well the police have identified the body. I don't know if they've done it through  
4 fingerprinting or what method they did it, but they're certain it was Hae Lee." And his  
5 comment is that all Asians look alike and that the police were stupid. That they had tried  
6 to trace Hae Lee back through a visit to her father in California and her father - - the lady  
7 that lived in California, and that he didn't think it was really Hae Lee. I assured him it was  
8 Hae Lee, and he started to cry. And I started to hug him, and pat him shoulder, and told  
9 him I knew that he loved her, and to think back when - - to a good time. And he said the  
10 night before Hae Lee disappeared she had called him. She had wanted to get back  
11 together with him, that she still loved him, but that he didn't want to get back into that  
12 relationship in that manner - - that they would always be friends. And that was unusual - -  
13 that was an unusual comment to me after he had just learning that she had died.

14 Q. Did you have any further contact with him after that day?

15 A. After that Adnan began talking to friends, and friends were in and out of the  
16 health suite all day. A group of friends went to another student's house to (indiscernible)  
17 together, or to talk, or to just be together to share their experiences. And I called Adnan's  
18 mother and asked permission for him to go, because I had to receive permission for every  
19 child to leave the school. And when I hung up from the - - from speaking to his mother  
20 and told Adnan that his mother had given permission to let him go, he - - he was fine. He  
21 was laughing, and he was smiling, and he left with his friends. It was a complete change -  
22 - a complete change. After that time, I saw Adnan two or three times - - maybe - - maybe  
23 a little bit more. Just, you know, he would drop by and say, you know, hi - - how are you.  
24 I though we had established some communication if he would drop by just to say hello.

25 MR. URICK: Witness for the defense.

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IN THE CIRCUIT COURT FOR BALTIMORE CITY

STATE OF MARYLAND

\*

V.

\*

CASE NOS. 199103042-46

ADNAN SYED,

\*

Defendant

\* \* \* \* \*

( MOTION FOR NEW TRIAL/DISPOSITION )

JUNE 6TH, 2000

BALTIMORE, MARYLAND

BEFORE:

THE HONORABLE WANDA KEYES HEARD, ASSOCIATE JUDGE

APPEARANCES:

For the State:

KEVIN URIK, ESQUIRE

For the Defendant:

CHARLES DORSEY, ESQUIRE

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1 ability to do anything you wanted. Anything at all.

2 I disagree with you, Counsel. This wasn't a  
3 crime of passion. The evidence, as I recall it to be and  
4 the jury found by its first degree conviction, meant  
5 premeditated with malice aforethought, as we say in the  
6 law. That means you thought about it. The evidence was,  
7 there was a plan, and you used that intellect. You used  
8 that physical strength. You used that charismatic ability  
9 of yours that made you the president or the -- what was it,  
10 the king or the prince of your prom? You used that to  
11 manipulate people. And even today, I think you continue to  
12 manipulate even those that love you, as you did to the  
13 victim. You manipulated her to go with you to her death.

14 The sentence of the court on the charge of murder  
15 in the first degree under case Number 199103042 is life.

16 The sentence of the court under the kidnapping,  
17 under 199103043 is a consecutive term of thirty years.

18 And the robbery, under 199103045, I sentence you  
19 to a period of ten years, concurrent with the kidnapping  
20 count, which is running consecutive 042.

21 I find that the false imprisonment does, in fact,  
22 merge and will fall out by application of law.

23 I also find that your concern for your appeal is  
24 a good one. Your attorney is going to explain to you your  
25 appellate rights. Why don't you do that?