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DRAFT, 07/14/99 4:50 AM

MCG Attorney Questions & Notes

J. Angeletti #706, P100, Ct. 3 M \_\_\_\_\_

**HANDWRITTEN REVISIONS A/O NOTES**

03.22.99, 2:50 p.m.

Know Adnan Syed?

How did you know AS?

What do you mean through Mosque?

As a student?

When did you come to know him?      6 years

13<sup>th</sup> prep for 14<sup>th</sup> prayer service

14<sup>th</sup> pray service w/ 20 other boys

1<sup>st</sup> mother-in-law left

“Like Sunday School teacher”?

Your “responsibility” to impart Islamic teaching to young people?

Do your younger people come looking for guidance?

Relationship with Adnan? Teacher not friend

What kind of things do you counsel?

vs. B \_\_\_\_\_ Rules?

Fast Rules?

Prophet = Obey

What about lying? A \_\_\_\_\_ inappropriate \_\_\_\_\_

What about dating? About group of individuals?

Where is Mosque?

You are his teacher and his friend?

Bail Petition?

6 years know him - ever counselor?



Comforted mind More receptive  
than a stressful mind

About anger? Adnan because he's taught it over and over again?

So did Adnan say "comforted"? Not continuing relationship?

How did you know that?

Are you saying that he didn't say anything specifically?

What specific did Adnan Syed say?

So it's March 24 and you can't recall a conversation?

Adnan, Yes it is March 24

Yes, I recall a time when I \_\_\_\_\_ Syed in the face

But no, I can't recall whether he

What did \_\_\_\_\_ say? About women? No

How often did you see members of family?

Is it fair to say seen Adnan or family almost on daily basis/consistently?

How long attended Mosque?

When teach Sunday Schools?

What is the address of the Mosque?

Other Mosque addresses?

Ever see others? Outside of Mosques?

Friends/Friendship with Syed Family?

Friends?

Adnan - friend or active \_\_\_\_\_ - A. Student

Bilal \_\_\_\_\_, Sunday School Teachers?

Occupation? Anything which occupies your time? Paid or Unpaid?

Vicky Wash, I can't quite recall -  
several days ago

How many times pray/prayer per day? 5 - range?

Specific posture?

The direction facing? N.E.? Toward House of Abraha?

Who praying to? God?

February 1999 S/W Adnan Syed in Police Station? Yes, I spoke with him.

Believed Detective who said was in Police Station?

"About \_\_\_\_\_ word initiated"  
Comments Vicky Wash - I guess  
you've answered my questions?

Name of Detective?

Date? Time of Call?

Who "initiated" that?

More than one call?

What number did you call? Adnan called Detective Ritz.

Met Detective Ritz?

#- give to Detective Ritz?

Give to Adnan?

Pretty much everyone has it?

Make up prayer? If missed?

Age/Range of Students? Adnan now Srs. 14+ Previous 8-10; 10-12; 14+

Monday, 11:15 a.m.

03.29.99, 12:00 p.m.

Who taught different ages?

Who taught Sunday School? 6 years?

What was 1<sup>st</sup> class taught to Adnan? \_\_\_\_\_ At 8-10 years @ age 11?

Adnan in that year? Yes. Next level?

10-12 - 1 year, 12-14? He only taught one (1) year?

What calendar year was that? About 94-95 (think)

Was any other occasion? Taught Adnan?

Would not formally teach Adnan? No.

So would only see him on only formal events? Speeches? Talks?

Last "counseling" session with Adnan? Adnan's mother's "advice"?

(21) About his mother asked "Do you know why"?

Any explanation of why her and not his father or uncle?

Are you called upon by parents to talk with children about religion?

Do you know why Adnan calls his father? No

Did you ever ask why?

(16s) Did he tell you?

Ever call a time and spoke w/ Adnan? Yes.

Were you aware that Adnan was arrested?

What did he say to you?

Crying, Terrified - I didn't do it?

How long did conversation take? Adnan  $\geq$  5 min., I don't know?

(19s) But had to wait because cops in room?

What did you say to Adnan?

Did Defendant indicate that he was charged with murder of her?

(42s) But because Defendant waited (25s) at Door?

Did Defendant mention that he was charged with murder?

(13s) Or knew \_\_\_\_ her?

How do you know that parents had hired a lawyer for him?

Answer: Family member called me for referral

When did family member call?

Who?

Prior to your talking to Saad? (spelling?)

Mother's name?

When Mrs. Syed ask him to talk (mention Homecoming Dance) to Syed?

Answer: No details

So you were not aware that father had "jacked" him out of homecoming dance?

Answer: No aware of any of that before I sp/w Adnan

Heard rumors after event from \_\_\_\_ "rumbling" = "after"

Ever ask to speak to Adnan about inappropriate dating behavior? No.

Contacted by Defendant's older brother on cell or other phone?

Out of town?

Did brother know location?

Did he have cell phone number? I don't remember.

(23s) but then waited 56 sec at door

Why do community members have your cell phone number?

Answer: Because I give it to them.

Why do you need to give the number to everyone?

Answer: Never said I gave it to everyone  
Don't need?

Are you "on call"?

Number anytime, anywhere?

Answer: Also have home number.

When you talked with Adnan and he told her?

Did you ask him who her was?

Answer: No

Ever come a time when he was "calmer" later that day?

Answer:

Isn't it true you already had name of individuals he was alleged to have  
murdered?

Answer: yes

Did his parents talk with you?

Did his brother tell you the name?

Is that what you're saying? No one told you her name?

That day?

M - to the best of

So you assumed it was Haymen Lee?

In conversation (2<sup>nd</sup>) between you and Adnan, who initiated call?

Answer: I assumed he did

2<sup>nd</sup> conversation? verbatim

Where was Plaintiff when you received 2<sup>nd</sup> call?

In town? or Out of town?

Answer: I don't remember

Knew was Out of Town - 1<sup>st</sup> call?

What time? How long after 1<sup>st</sup> call was 2<sup>nd</sup> call?

Best estimate of time?

Any conversation with Adnan since? Yes

Starting with first one, when?

Can you give an idea of how many? 4-5

Did you call him? Or did he call you?

Substance of 1<sup>st</sup>?

Answer: Can't recall

Best way \_\_\_\_ to describe?

Any telephone conversations, did Defendant mention relationship with  
Heyman Lee?

Example of what you might have said? Quran

Did Defendant ever discuss any facts? Defendant denied.

Did he ever deny relationship with Hayman Lee?

So you're telling me - he never mentioned having relationship with Hayman  
Lee?

Answer: spiritual con\_\_\_\_\_

Have you ever met face to face?

Answer: 2x at jail

When were those 2 x?

Answer:

What did you talk about?

Did Adnan ever talk to you or say where he was the day of the murder? \_\_\_\_\_  
\_\_\_\_\_

If someone discussed or told you facts about or murder, would you recall?

So you're saying in 5x Defendant never brought up issue?

Prior to Jan 13, any conversation with Defendant about murdering Lee?

Did you have occasion to see Defendant on Jan. 13?

- Answers:
- a. In evening
  - b. didn't recall time
  - c. About a specific prayer - next day
  - d. Ramadan \_\_\_\_\_ explained

When is Sunday? >5

When would you have spoken?

What was day Ramadan?

Iraz Bombing, about 19, 20, 21<sup>st</sup>

Are students in Woodlawn School?

Are referred by Mosque? No

Answer: 14<sup>th</sup> and 15<sup>th</sup> off

On 14<sup>th</sup>, saw Defendant leading prayer?

What time? >Night prayer?

>8:00 p.m.

[Meeting with Adnan - prior to meeting on January 14 prayer?]

Would you have seen him? Specifically on 11, 12, 13, 14?

Dental School?

Recall seeing him (Defendant) on January 11<sup>th</sup> (a Monday)

Occasion to accompany Syed to store to purchase a cell phone?

What was purpose of your accompanying Defendant to phone store?

Is that something you do for all members?

Went with Syed on January 11<sup>th</sup> to purchase a call phone?

Do you remember, if in January?

Did you hear on TV that Hayman Lee was missing?

On radio?

By gossip?

By community?

Answer: No, but did hear about it.

From whom?

Answer: Adnan

When did he tell you about it?

What did he say to you?

What did you say to him?

Are there any other \_\_\_\_\_?

You are not here to tell me what to do!

So you're telling me Adnan didn't tell you that he participated in the murder of Haymen Lee?

What telephone store? AT&T Booth

When trip to AT&T?

Was it before or after learned Hayman Lee missing?

Who gave clerk

Who would have given Adnan?

vb - Bill is in Adrian Syed Adnan

Would you be in listening range?

Do you generally have to spell your names for clerks?

Have you ever known Adnan to use Adrian?

Do you recall if Adnan got possession of phone the day at store?

Is it customary to use Mary in your religion?

Any occasion to advise Adnan vs. use of marijuana?

Did you know Adnan said he used marijuana? No

Was he ever admonished for stealing from Mosque? No

Was money missing from Mosque? No

Would [Emer] know?

Answer: Wh\_\_\_\_\_ Emer

Who is leader of Mosque? It depends on what matter at hand.  
Iman and President

Who concerned about missing money?

Answer: Both

11:00-2:30

2<sup>nd</sup> Floor St. Paul Street - East \_\_\_\_\_, Room 207

03.30.99

11:00 Session

Mr. Adnan have you ever had any occasion to visit hotels or motels in area where you live?

Answer: Yes, I've had occasion to visit them.

Tell me the names:

Answer: Knights Inn

Quality Inn

Restaurant's attached to Days Inn

Any of those that you registered in or stayed in?

Answer: Yes, register under his name.

(Don't recall if he stayed there, may have)

So you're saying you registered but might not have stayed?

Answer: Register for our speakers who come to speak at the organization (the mosque, student organizations, ...)

Did you register at Homestyle Inn in your name? Yes

Do you recall when?

Answer: No

December 9, 1992 - does that refresh your recollection?

Answer: Possible, but I don't remember

Printout in your name?

\_\_\_\_\_ Bill check in time 12.09.97.

Do you remember did you do it for yourself or someone else?

Answer: I don't recall

It states your address, 21 [REDACTED], 21244. Is that your address?

Answer: No (without waiving privilege)

Have you lived there?

Answer: (w/out waiving privilege) Yes

When did you live at 21 [REDACTED]?

Answer: When I first moved to Baltimore, 2-3 years

Approximately 1992-93?

Then approximately 2-3 years but not sure

When moved to Baltimore (w/o waiving privileges)?

Answer: End of 1992 begin 1993

Approximately you stayed there 2-3 years? (w/o privilege)

Answer: Approximately, but \_\_\_\_\_ if recall, yes, but not sure

Do you recall any other occasion when you registered at Homestyle?

Answer: >12.07.97

Could you explain to Grand Jury, why would you register in your name for S.O. an official business to Mosque?

Answer: 1<sup>st</sup> never said official business - sometimes for student groups. He did no his own.

2<sup>nd</sup> Didn't know how else to reserve, always reserved rooms in his name.

Didn't you know the name of the person who's going to come?

Answer: yes

He told the Grand Jury that sometimes he tells the Clerk someone else is staying there, e.g. a speaker because he doesn't always go to the motel with them.

Why register in your name?

So, it's your procedure, if you will, to register under your name and they will check in under your name?

Answer: Not a procedure, but I have done that

Have you ever registered in the person's name as opposed to your own name?

Answer: yes

Why is it you register the guest in your name on some occasions and occasions you register the guest in his own name?

Answer: Generally, if the person is with me I'll register in the person's name. Clarify the question, which sounds like you're speaking of only one person.

Have you ever registered for Adnan in your name?

At any hotels?

Answer: (w/o waiving privilege) For last 6 yrs. No, not that I know of (to the best of recollection)

You registered for cell phone and not hotel?

Answer: yes

(foreman Grand Jury)- same lady

Was relationship of Adnan discussed in Mosque between you, Iman, President and Adnan prior to 1/13?

Answer: I don't know. I did not discuss

(foreman Grand Jury)- same lady

Did you know Syed's parents before you moved to Baltimore?

Answer: No, did not know them, but saw them at big gatherings. [told me: he didn't know \_\_\_\_\_ re: them, just saw their faces]

(foreman Grand Jury)- same lady

Do you know if any of them work or have a job?

Answer: Father works for state, Mother has daycare at home

Make sure he's excused

(foreman Grand Jury)- same lady

Up to what age do children stop Sunday School?

Answer: Generally, 14-15 but we do have other programs, generally on Sundays because every one is there.

(foreman Grand Jury)- same lady

What address was on Contract, do you know?

Answer: Didn't know at time, received bill at house. Didn't intend that?

Did bill come to you?

Answer: yes

Your name? His name?

Answer: both

How name appear?

Answer: misspelled

What did you do?

Answer: Told him and parents to change address and correct spelling

Did you sign Contract?

Answer: Must have, don't remember

How many other others have you done this for?

Answer: Many, over years, but don't recall specific number

You said you were out of town when Adnan arrested?

Answer: Family to social dinner, then stayed over because it was late

Do you remember how Adnan's brother reached you?

Cell phone or friends' house phone?

Answer: I don't remember

How would they have reached you? Would they have called other people?

Answer: Don't know

You said there was gossip re: father going to homecoming and taking Adnan home?

Answer: Got message on telephone from Adnan's home or his cell phone

Jan. 1997 Readers Digest is \_\_\_\_\_ anti-terrorism  
"Can we Stop This Super Terrorists?" short article which mentions a  
Pakastani terrorist. (11/98, 12/98, 1/99, 3/93, 7/94)  
Also National Geographic \_\_\_\_\_ assassination of Pope, No one else

Did you hear gossip about relationship and/or breakup?

Answer: Heard Adnan broke up with her. Heard they had a good relationship

Did you hear this gossip in Jan, Feb, Dec?

Answer: Don't recall

(Vicky was saying as he went in) "I believe he said Adnan broke up, not that gossip said so"

When (Hayman missing) Adnan called to say that Hayman was missing?

Did you know her at that time?

Did you know her name?

Answer: He said "Hay".

I said who is Hay?

Answer: Hayman Lee

Who is Hayman Lee?

Answer: Person I'm seeing

Vicki: You said he showed concern? What concern did he show?

Answer: got impression he was worried, surprised, concerned

Vicki: Did there come a time when there was conversation or telephone call when her body recovered?

Answer: yes

Vicki What was conversation?

Answer: He was crying, he found out she was dead

Was it a telephone call?

Answer: (w/o waiving privilege) yes

Do you recall any other details of conversation:

Answer: no

END OF A.M. SESSION

WITHOUT WAIVING ANY PRIVILEGE

03.30.99

Afternoon Session

different Grand Jury lady

What are the roles of males as teachers in the Islamic community?

Answer: No set rule, it's like asking the role of males as teachers in community.

Teachers teach. Males go to Mosque to pray. They can arrange for functions, etc.

Must be good husband, good father, good brother, etc.

Grand Jury - same lady

As a teacher, who certifies you as a teacher? What qualifies?

Answer: No specific certification, voluntary school. If knowledge the Principal, Vice-Principal can ask do you want to volunteer, or person can volunteer

Grand Jury - same lady

Consider the roles, (men, physical job, woman inside chores) Your conversation with Adnan's dad about growing up as an adolescent? And the specifics?

Answer Do remember not a sit-down talk. Don't recall any specific conversation - talks with all students, parents

Since constantly in contact with Adnan's mother, how would you characterize relationship with father?

Answer: Never said "constantly" in touch. She called once, e.g. father is away every often 1-2x months because he's a preacher. Father - see him in Mosque much more often

Have you ever talked with Tamir re; same things as with Adnan re: Islam?

Answer: yes

Who did you seek advice from:

Answer: Elders, Iman, President, people I feel have wisdom

Did you discuss Adnan's dating with them?

Answer: Not Adnan, but generally re: dating among young boys/men.

And what advice was given?

Answer: Teach them, teaching of Koran and Sunnah (... ways of the prophet) The good and bad. They have to decide.

When did this conversation take place?

Answer: Sometimes in the Fall, don't remember exactly when.

Grand Jury - same lady

What is the next course of action if you feel that they're not being receptive, or \_\_\_\_\_ change behavior?

Answer: You try to keep talking to them, invite to lectures, talks. Hoe they're receptive. Adnan was \_\_\_\_\_ -

Grand Jury - same lady

When did gossip re: Adnan and relationship start?

Answer: Sometime in fall

People specifying the gossip - was it his own age group? And is it normal to spread gossip?

Answer: His age group; people talk; but gossip is wrong.

What's the penalty, if so, dates someone outside Islamic community?

- Answer:
1. Doesn't matter if inside or outside community
  2. Offer to marry "in our community we have no penalty for that"

Grand Jury - another gentlemen

You said you got many people cell phone numbers? What are their names?

Answer: (w/o waiving privilege) feel uncomfortable re: giving names. I don't have their permission .. do you need names)

Is there any punishment for dating outside the Islamic society in the Koran

Answer: No. No distinction between inside or outside.

n.b. [dating \_\_\_\_ adultery, which is forbidden by Koran, but dating is too close for comfort to adultery so it's frowned your..]