Memos to File, March-April 1999.

Records by Chris Flohr, one of Adnan's defense attorneys immediately after his arrest. Individual copies of the 35 files can be found here:

 $\underline{https://undisclosed.wikispaces.com/space/content?tag=Individual+Flohr+Notes+and+Memos+from+XAEB}$

Symbols used Δ = Defendant (Greek letter Delta)

 \mathcal{H} = Plaintiff (Greek letter Pi)

Date	Subject of Memo to File	Page
01 March 1999	Transcript order	3
02 March 1999	Calls to a defense attorney and a private investigator	5
02 March 1999	Processes to appeal a refusal of bail	7
02 March 1999	Investigator Frank Napfel	9
03 March 1999	Information about Forensic Psych Evaluations in Baltimore	11
04 March 1999	Visit to Adnan. Discussed: email, hat, Bilal, Don, car. Questions asked by police: "Guys hurt her", tools, sex.	13
04 March 1999	Listening to Bail Review tape	15
05 March 1999	Juvenile Issues - including Motion to Transfer Jurisdiction to Juvenile Court	17
05 March 1999	Calls about Adnan's medication	19
06 March 1999	Visit to Adnan. (Location BCDC.) Discussed: Glasses, writing letters, Nisha, Hae, DOB, Charging document, Hae's memorial service, Guidance counsellor Ms Stuckey, Woodlawn Principal (Dr J Wilson), forged Drs appointment notes, Ms Schab, Don's Camaro, Aisha, Debbie, Mike in California, Jake in Georgia.	
09 March 1999	Bail Re-Review, record of calls made.	25
10 March 1999	School records.	27
11 March 1999	Calls about Adnan's medication	29
12 March 1999	Visit to Adnan. Discussed: Dion T, Nissan Accord, engine noise, repairs, daytime calls to Krista and Yasir	31
12 March 1999	Calls about Adnan's medication	33
12 March 1999	Call to Saad Chaudry. Explanation of rights	35

Date	Subject of Memo to File	Page
19 March 1999	Visit to Adnan. Juvenile Facility (segregated area for juveniles within BCDC). Discussed: notes between Adnan and Hae, passport, family, school and timetable, EMT, volunteering, college. Questions asked by police: "Solicited someone to do it", fingerprints, hair, clothing samples, red gloves, blood, DNA, Jay, Stephanie, "Why would you trust a black guy who puts pins in his mouth?"	37
20 March 1999	Flohr's Notes of the Police Search of Johnnycake Rd, page 2	40
26 March 1999	Calls about Adnan's medication	42
29 March 1999	Calls about Adnan's medication	44
29 March 1999	Judge Mitchell's request for Adnan's DOB	46
29 March 1999	Home Detention	48
29 March 1999	House Arrest	50
29 March 1999	Defense opposing Postponement. Call to Asst State's Attorney	52
31 March 1999	Receipt of Records / Production of Defendant. Record of dealings with Judge Mitchell	54
31 March 1999	Call to Saad Chaudry. Representation	56
April 1999	Handwritten note. Untitled. Defense strategy, post-bail hearing. Not dated, but must be between 1 and 14 April 1999. Vicki Wash's (untrue) arguments (about Pakistani men) are mentioned, but defense have not yet been able to locate Harry Marshall, the expert she "quoted".	58
01 April 1999	Calls to Nisha and family re police interview and representation, Chaudry family, defense team and other attorneys	61
01 April 1999	Videotape (of 31 March Bail hearing?)	64
05 April 1999	Transcripts (of 31 March Bail hearing?)	66
06 April 1999	Calls about Adnan's medication	68
06 April 1999	Minutes. Call to Kenneth Norris	70
07 April 1999	Visit to Adnan. First mention of Tina Gutierrez. Plaintiff questions, Psychology class, Track, College applications, Break ups with Hae, "really mean note", photo, psoriasis. Questions from police to Stephanie: Jennifer P, Jay	72
08 April 1999	Calls: to Mrs Rahman, to Drs and Medical Services Division re Adnan's medication	74
14 April 1999	Court appearance on 14 April. Problem with court procedure and Adnan being sent back to detention prematurely. Indictment.	76

v.c. *	
	To: File, Syed
	Grom Plane
	DATE: 3-1-59
	DATE: 3-1-59
	4:06PM 410-878-8015, left nee, #res. 05 buil review to order tape NSA.
	4:06Pm 410-878-8015, left nee, #res 0's
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Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed. Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0522, page 76 of original PDF document, Appendix references as added by State = App-072

Note of telephone call

TO: File, Syed FROM: Chris Flohr

RE:

DATE: 3-1-99

406 PM [tel no] left message, pager and home numbers re defendant's bail review to order tape ASAP

3/2/99 Spoke with Brian Homer [sp?] and I can pick up tape tomorrow.

PO: File, Syed FROM: Flots DATE: 3-3-99

Gen Christopler 410-962-3962

Froh Naftel bast ontlere 410 788-7800 Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0525 page 79 of original PDF document, Appendix references as added by State = App-075

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr

RE:

DATE: 3-3-99

Gary Christopher [Baltimore defense attorney] [tel no]

Frank Napfel best out there [Balrimore private investigator] [tel no]

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1 File, Syed
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5. Ct spend Appuls
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37 3-707
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Ap p-073

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed. Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0523 page 77 of original PDF document, Appendix references as added by State = App-073

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr

RE: Court of Special Appeals

DATE: 3-2-99

[Left hand side of page is cut off by copy technique]

JP 3-707

10-260-1000 -> 260-1500 , Ct of Appeals 1450 260-1450 Ct of Sp Appeals Leslie Gordette

1) Cir Ct clerk

Remind transcript [sp?] quicker that usual bec, of 10 d time period Quick turnaround -> will generally make a ruling @ time for filing of Filing fee \$50 to Circuit Court + Cir Ct will charge \$60 No page limit. Be as thorough as can. Ct not [unitelligible] Not [app struckthrough] addressed to Criminal Appeals Division of Attorney General's Office

TO: File, Syed RB: Kercuster's Investigator DATE, 3-2-99 Frak Nafafel 410-788-7800 Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.
Published online by Court of Special Appeals as part of State's 1 May 2017
Appendix of Cross Appellee (20170501_XAEB_COSA),
A-0524 page 78 of original PDF document, Appendix references as added by State = App-074

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr

RE: Kareski's investigator [sp?]

DATE: 3-2-99

Frank Napfel [tel no]

TOIF LE FAVESTO DE LA CONTRACTION DEL CONTRACTION DE LA CONTRACTIO	maj numbro (frodrak adjugar) no na o sarran	and the second country of the second and the second
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Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017

Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0526 page 80 of original PDF document, Appendix references as added by State = App-076

Note of telephone calls and actions taken

TO: File, Syed [struck through - invest]

FROM: Chris Flohr

RE: Psych DATE: 3-3-99

Jerry notes State Psych = Dr Spodek who can be hired for \$1000

Good psych = Ellen McDaniel very conservative and judges like her

TO: File, Syed RE; Spedig Madres

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0528 page 82 of original PDF document, Appendix references as added by State = App-078

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr

RE: Speaking with Adnan DATE: 3-4-99 [corrected]

Passport [struck through]
Email
Name of deceased's present b/f
Bilal's relationship not family
Never been in car recently

Note: Personal property sheet says [hat?] but + defendant [had?] no [hat?] + not know anything about it.

Email Syed _ _ adnan [at] hotmail.com password poppy
Hae set up
Computer @ Mum & Dad's house

Last email about [illegible] + be friends ok.

Guys hurt her, tools [spelling? struck through], PO' - sex [spelling? struck through, PO = police officer(s)?]

PO. File, Syed REi Listen in to Bril Review tope DATE: 3-24-99 FROM: Flohr 10 yrs. Ivenjale Rd. 5 no enloyed No what com history nor Invenile Record
State's Affy Borbson Richman on behelf of much Cohen: whedellowe a whese with when in this body First on the day that Mar Min her was killed that he was guing to kill her." Dudge Kingrone: l'imagine you're asking bail remi de same. Non much Plus to go to college ilehes dungs lead a honest har alarding life 75-100 ontside of m. Marys a district son tanky 5 consin " Palah App-077

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0527 page 81 of original PDF document, Appendix references as added by State = App-077

Notes from tape

TO: File, Syed FROM: Chris Flohr

RE: Listening to Bail Review Tape

DATE: 3-4-99

10 yrs Johnnycake Rd 5 mo employed

* -> Not admit to any substance abuse
No adult criminal history or Juvenile Record
State's Atty Barbara Richman on behalf of Mark Cohen

on tape

1:00 [illegible] do Have a witness who was with the defendant when the victim's body was buried. and Also we have a witness who would say that the Defendant told him on the day that Hae Min Lee was killed that he was going to kill her?

Judge Hargrove: I imagine you're asking bail review the same Doug:

Ρ

Now [accepted] <- Plans to go to College He has always led an honest law abiding life 75-100 outside court room Always a dutiful son "Family's cousin" Bilal

" dadison@ Mail.opd. state. md. 45" -TO Pile, Syed A - 0529 From: Flohr RE: MISCHUILISMY addisenter con DATE: 3-5-49 Motion 10 1 mester Insdiction to Juvenile Count At 27 5594(4) Cond (f) Entire case 16+17 not eligble to du. Ct. transfer "Winder" "Recrewater" "Transfer" This shit is both morning gand finisdiction. 3-828 Control of Jung Records May be an educational lant not see t. Hum highs watch was to do an interieur Midnel Bocheneck 212-216-1245 "Bohenik" 212-216-1245 e-mil bochenme hrav.org.

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0529 page 83 of original PDF document, Appendix references as added by State = App-079

Note of telephone calls and actions taken

[next to header]

speaking with David Addison "dadison@mail.opd.state.md.us" [sic] [alternative email address struck through and illegible]

[From top] TO: File, Syed FROM: Chris Flohr

RE: Miscellaneous Juvenille [Juvi] Issues

DATE: 3-5-99

"Motion to Transfer Jurisdiction to Juvenile Court"
Art 27 section 594 (a)
(f)
Criminal Court
Entire case 16+17 not eligible for Juv Ct transer

"Waiver" "Reverse Waiver" "Transfer"

This [st?t illegible] is both moving jail and jurisdiction

3-828 Confidentiallity of Juvenile Records CJP May be an educational but not see it

Human Rights Watch was to do an interview Michael Bocheneck [tel no]
"BohEniK"
email [address]

TV: File, Syed		
pt. medichos From: Chris Plate		
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Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.
Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),
A-0530 page 84 of original PDF document, Appendix references as added by State = App-080

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr RE: Medications DATE: 3-5-99

Note: Bilal gave me this info earlier this week Doctor: Bonnie Orzech, Woodlawn Dermatologist Med: AQUAPHOR mixed with ECOCON 01%

-> Bilal Ahmed

[ext #] Dr Bonnie Orzech -> not listed [tel no struck through] Commercenter [address] "Woodholm Center" [tel no] Promi Plan DATE: 3-6-99

-Glasses — Utd resources 4 Knowleges - Charges/legel research

Add of jul- waby letters thou met suntimed Misha Signe

Mistory of Hale School records / guidances sellor POB chy. doc typed i hadwitten

Memoral series on 11th @ Woodlan HS. plant tree Osypoul to be 1st person

About 2-3 was after initial disappearace, Ms Strikey warned & to be careful, will be asked yours, think by speak, took to see principal who good 5, miles advice + said Pot shull are here and will voluptee to stang by

Sain yo. gont consellor, Ist gives GPA+ then works w/ college Staff. Mrs. Structuren = gardence consellor, Wen Disorde up, D didn't do his Ery assignment. En teacher told is Stroken of Mrs. Structuren went to O + said relatively to happen, its ok.

had a doc appt (Mom une Here forged documents)

1 rever told anyone he was born in 80 het clarys said 81. In fact, gail questioned him on that.

Ms Schanb = french teacher (Mae's feacher's aid for French).

O thinks she had alot to do up to breaking up. O thesa after part of break up was new boff hove barad our amoro green. She was very superficial favored barag about her boff driving BMW, etc.

Hais friedy Aghe Piller + Deba worch know that best.

History said has prior blf died in California in a congash

"Mike" (o not have last marge). O the Not know wheeler

was infalif. but knows she was near no wheeler beaches

Hae's best friend Sake' died of concer in Ga, (not know

last new or where in Ga.) both man were older than her.

Mike died when she was in 10th grade / the was out in Calif

from about end of 9th grade infil middle of 10th grade

around December.

Page 1 had previously been published on February 12 2016, shortly after the "PCR" hearing. Several pictures of the page were posted on Twitter by Justin Fenton, a journalist covering the case for local paper The Baltimore Sun. This was a quick fire response to a retweet by Susan Simpson - she was commenting on the State's arguments at trial, as reported by Fenton via Twitter. Within 24 hours he had deleted the tweet and attached pictures. He did not attempt to post any "unpublished" material in support of Adnan's case. Screenshots of the deleted tweets can be seen here http://imgur.com/a/5717f

Note to File dated 3-6-99, A-0531, A-0532. Handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA), Page 85-86 of original document, additional references as added by State App-081, App-082

[To Do list, top right hand corner]

-Glasses

- -Limited resources 4 envelopes
- -Charges/legal research

[From the top]

To: File, Syed From: Flohr

RE: Speaking with defendant

Date: 3-6-99

Address of jail - writing letters + how mail scrutinized ->self-addressed stamped and 1 piece paper Releases signed Nisha History of Hae School records/guidance counsellor DOB chg. doc typed v. handwritten

Memorial service on 11th @ Woodlawn HS. Plant tree. Defendant supposed to be 1st person

About 2-3 wks after initial disappearance, Ms. Stuckey warned defendant to be careful, will be asked ques[tions], think b4 speak, took to see principal who gave similar advice + said Police Officer should come here and I will volunteer to stay [with]

Senior yr guidance counsellor, 1st gives GPA + then works (?) with college staff. Ms. Stuckey = guidance counsellor. When defendant broke up, defendant didn't do his Eng assignment. Eng teacher told Ms. Stuckey + Ms. Stuckey went to defendant + said relationships happen, its ok.

Defendant would write letters about him from his mom saying he had a doc appt. (Mom knew [they'd] forged documents). [end of page]

[top of page]

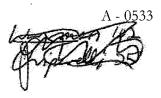
2 3-6-99

Defendant never told anyone he was born in 80 but always said 81. In fact, jail questioned him on that.

Ms Schaub [Schab] = French teacher (Hae's teachers aid for Ms Scaub in French). Defendant thinks she had a lot to do with Defendant breaking up. Defendant thinks another part of break up was new b/f drove brand new camaro green. She was very superficial and would brag about her b/f driving BMWs, etc

Hae's friends Aisha P and Debra W know Hae best. Hae said a prior boyfriend died in California in a car crash "Mike" (Defendant not know last name). Defendant not know where Hae was in Calif. but knows she was near no beaches. Hae's best friend Jake " died of cancer in Ga. (not know last name or where in Ga.) both men were older than her. Mike died when she was in 10th grade. Hae was out in Calif from about end 9th grad until middle of 10th grade around December.

West



FROM: Plots
RE: Buil Ren Pleview
DME: 3-9-99

9:29AM 410-878-8058, Parm - bushally goes before the

9:33An 410-878-8009, Lonnie Fergeson, busy.

10:39 mm 410-878-8009, Andrey from Connie Fergeson's obsce J. Sharger. Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0533 page 83 of original PDF document, Appendix references as added by State = App-083

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr RE: Bail re review DATE: 3-9-99

929 AM [tel no], Pam - usually goes before whatever judge is there for re-review.

933 AM [tel no] Lonnie Ferguson, busy

10:39 [tel no] Audrey from Lonnie Ferguson's office, J Shager.

To: File Syed Phon: Flohr QE: School Records DATE: 3-10-49	
3'2399 887 - 4060 Bob Haynes, not in blde Choline Swette not have growers you Still call	And the state of t
	um sied paragraphy, mig verspreisier vertreiten der Egipp John mitten einem einem eine versche in geste versch John I. der gebruch wie der dem der dem der
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Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed. Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0535 page 85 of original PDF document, Appendix references as added by State = App-085

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr RE: School Records DATE: 3-10-99

323 PM [tel no] Bob Haynes, not in building Charlene Scaretta not have answers yet. She'll call



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Contraction of the Contraction o	FRE	m:(Loh	
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11:12Am 396-5013, Yvonne Dwis, left ringe, + re: med for Spel.

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed. Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0536 page 90 of original PDF document, Appendix references as added by State = App-086

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr RE: Medication DATE: 3-11-99

1112 AM Yvonne Davis, left message, number re medications for Syed

TO: File, Syed From: Plohr RE: Muly OBBOC CXXSILL Woods Ofter thys! Dion Taylor - Sucker as O, 2dr. Accord (Ohs 4ds) Bedattell gue that day, Drois son him & contell B' cox miling from noise. Costy fan wire was lone, fixed 1-2 week offer bangie M+N Car Care Hairly's medicine, Brygie my be went of othy com it, School schalle gone, This hypered @ 3-3130 pm, of the Not who sees call Krista before 5Pm beer sle worly whil SPME can invoce place (stolen cas; not divided go to her tale processes the Your Mi - Owald not call his diring bee follow always has the phone diring the day

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed. Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501 XAEB COSA),

A-0538, page 92 original PDF document, Appendix references as added by State = App-088

[above the header]

1:05 PM 2:34 PM

[Adnan ID#]

TO: File, Syed

[main section]

FROM: Chris Flohr RE: Calls

DATE: 3-12-99

[Each item in section between ** has been struck through]

ID#
Phone:
Beard:
Call Bilal:
W[illegible]:
Other attys:

Dion T - same car as Defendant, 2dr Accord (Defendant has 4dr) Basketball game that day, Dion saw him and commented Defendant's car making funny noise. Cooling fan wire was loose, fixed 1-2 weeks after Baygie? M+N Car Care (family's machine). Baygie? may be wary of atty coming in. School schedule should list the game. This happened @ 3-3:30pm in front of school front entrance close to gym.

Not make sense call Krista before 5 pm because she working until 5 PM @ car insurance place (stolen cars not claimed go to her + she processes them)

Yasir Ali - Defendant would not call him during day because father always has the phone during the day.

From: Plohe
PE: Meds
DATE: 3-12-5

3:4680 410-396-5013 Yvere Dails

3.498m 410-837-2135, D. Boman, nomer.

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0537 page 91 of original PDF document, Appendix references as added by State = App-087

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr RE: Medication DATE: 3-12-99

346 PM [tel no] Yvonne Davis,

349 [tel no] Dr Berman, no answer

TO:File, Syed
From: Flohr OE: Spelly-10th Sand Charley Si33AM Explicit his of to spell to spell he wishes
DATE: 3-12-59
8:33AM Sand Chandry
explied his of to speck to more hewisters
+ has a suffer for the special to the second
beforeed if sulp t told by Judy to speck
He asked worlden't to look and it not spale
that shold be do I answed I and make
that does you for him, I ske a called it he'd
yes + I provided the # and added him to all
yes + I provided the # and ordered him to call
The state of the s
8:39Am 410-492-5513 Drew, emploshed
ke gtt julian in samme menter i samme som en sense i samme som en sense i samme som en sense i samme som en se
a se sur suit de de la companya del la companya de

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0539 page 93 of original PDF document, Appendix references as added by State = App-089

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr RE: Medication DATE: 3-12-99

833 AM [tel no] Saad Chaudry

explained his right to speak to anyone he wishes and his right not to speak to anyone and can only be forced if subpoenaed and told by Judge to speak. He asked would it look bad if not speak. What should he do. I answered I cannot make that decision for him. I also asked if he'd be wiling to speak to our investigator. He said yes and I provided the number and asked him to call.

839 AM [tel no] Drew, explained he'd be getting call.

TD: File, Sned RB: Spelly to @ LyRiality DATE: 3-199 No suge con of volece so note. The pussport express. General College and course details - redacted may be better of your sold wyset. Bilal = Suby school feater Phyrade top Dh class. EMT Loopert white truspet Road Metro Coop, eldery petrats. Ent certified since llags old Plus farthall (dolors end frack, started 2 whis ago to harry & wordless Middle School PAL Recreation help hierarch 393510 Natral Uno visety (metar since this year) Mylest goods in EMT Calleges UmB C + College Park water results in

April Monday and a second of the second of t ANA sign- 4 inches on water + sign bottom, They write down what classes Period I Mis presse Period & Englar Soc Studies, Wrote tres 7:50-945 01:20-10:45 Am. Perture It 4th Wo tapes provides They have 2d + 4th present days together (4th person). = Paych). O som her in both classes. I Pot said O sphierted Sumen to do it huntress can D chille hor + brong body. Put her in tok Hun sliepe night geing her flee in trute and hole?

must ent you up in Side. O told the not ut

to full what this improve + want to speak to Bild + Hen they'd said more things. Fingerprints were All over the car, hair suples of chitts suples, Nothing said what blood or DNA. PO'SLIDO vering red gloves. They retired In Wilders
788-8495 gff Stephie (good Fred of 0) 788-8549
works @ poor store on Suphir Spring Rend
new Judsdom. Gives of RHAD new Sovertos perfect dones. Why would you toust a black gon who puts prins though his mouth

Note to File dated 3-19-99, A-0520, A-0521. Handwriting of Chris Flohr, Bail Attorney for Adnan Syed. Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA), Page 74-75 of original document, additional references as added by State App-070, App-071

Flohr's notes - visiting Adnan: Adnan and Hae's relationship, his family, his studies, and what questions the police had asked him during interregation..

TO: File, Syed

RE: Speaking with [delta/triangle symbol for Defendant] @ Juv[enile] Facility

DATÉ: 3-19-1999

No notes since broken up. Long time ago wrote notes No suspicion of violence in notes Think passport expired

SS # [] DOB []

Living home [sp?]: Mom, Dad, older brother Tanveer (21 - []). younger brother 9 yrs old [illegible]. Bilal = Sunday school leader

12th grade top 10% class. EMT for [illegible] ambulance transport Rural MetroCorp

EMT certified since 16 yrs old. Play football/defense and track, started 2 wks ago tutoring[sp?] at W[illeg] Middle School. PAL Recreation help homework ages 5-10. National Honour Society (member since this year). Highest grade in EMT.

Colleges UMBC and College Park waiting results in[sp?]

[end of page] [top of page] 2 3-1-99

April. Interested in pre-med, ER med

[illegible] Not sign [sp?] - 4 initials on waiver + sign bottom.

They wrote down what classes Period 1 Ms Muse, Period 2 Eng / or Soc Studies. Wrote times 7:50-9:15 9:20-10:45 *They have [illegible]* [*text crossed out*] 0/0 [illegible]/[illegible]

(They have 2nd and 4th period class together (4th period = Psych). Defendant saw her in both classes)

POs [Police Officers] said Defendant solicited someone to do it + witness saw Defendant choke her & bury body. Put her in trunk. How sleep @ night seeing her face in trunk and hole? Must eat you up inside. Defendant told them not want to talk about this anymore & want to speak to Bilal & then they'd said more things. Fingerprints were all over the car, hair samples & clothing samples. Nothing said about blood or DNA. PO [Police Officers] said [Defendant] wearing red gloves. They mentioned Jay Wilds [phone number] g/f Stephanie (good friends w/Defendant) [phone number]. Works @ porn store on Sulfur Spring Road near Landsdown. Lives off Rt. 40 near Double T diner. Why would you trust a black guy who puts pins in his mouth.

3-20-55

Apper 1:20Pm I made the following objections to Saf Bompote + I spenticulty asked him if he could hear me corosis the soom of he said yes (I happed from mitally told by the Saf B to stong in I made the following objections:

1) Wint was overboard in agreed and

a) In particular no particularly of search areas

- 2) I obspected to my photos being taken as noth in smooth anthorized photos being taken in the put home of these people.
- 3) Objected to warret statum persons premises wends vehicle" it is not covered out showing Judge his not review the document titis out particular.
- 4) Objected to unnamed witness in athdout-that basis doge is anoughto moralishe the warrant,
 - 5) Nothing in althought supports tests of the went nothing in althought suggests there is anything in the house.

Note: Det Ritts white, mustacle graying jews thatek But City shirt. Other R. Williams Africa Area, uniform But Co. Woodlawer Pct 2.

A-0540, page 94 original PDF document, Appendix references as added by State = App-090

[Document describes search of Adnan's family home on March 20 1999]

2

3/20/99

Approximately 1:20 PM I made the following objections to Sgt Bonaparte and I specifically asked him if he

could hear me across the room and he said yes. (I had been initially told by the Sgt B to stay in the living

room area). I made the following objections:

- 1) Warrant was over broad in general and
- a) in particular no particularity of search areas
- 2) I objected to any photos being taken as nothing in warrant authorized photos being taken in the pvt

[private] home of these people

3) Objected to warrant stating "persons primary vehicle" it is not crossed out showing judge did not review

the document & it is not particular

- 4) Objected to unnamed witness in affidavit-- that basis is alone enough to invalidate the warrant.
- 5) (Objected) Nothing in affidavit supports facts of the warrant-- nothing in affidavit suggests there is anything

in the house.

Note: Det Ritts [Detective Ritz] white, mustache graying jeans & Balt City shirt Officer R. Williams African Amer, uniform Balt Co Woodlawn Pct. 2 [Second Precinct is Woodlawn]

	DVF14, Syed
	Romipuh REI.
	DATE. 3-26-99
, all the second	
	3:02Pm 410-396-5013, Youne Davis
ž	Fax# 1625-27-66
	Trestat SUCS Ms. ACCUL 410-209-4063
	-3: 128m 4:0-486-9444 Dra Bungerzeck, garcinto,
	asked to tax.
•	
And the second s	
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Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.

Published online by Court of Special Appeals as part of State's 1 May 2017

Appendix of Cross Appellee (20170501_XAEB_COSA),

A-0541 page 95 of original PDF document, Appendix references as added by State = App-091

Note of telephone calls and actions taken

TO: File, Syed FROM: Chris Flohr RE: [Medication] DATE: 3-26-99

302 PM [tel no] Yvonne Davis Fax # [fax no] Treatment services Ms McCall [tel no]

312 PM [tel no] Dr Bonnie Orszeck, gave info, asked to fax

To: File Syed
TO: File Syed Pronifish
VE:
122789410-486-7166, Dr. Orzele -> Fixed prescrip to Konne TE & Some pash, and help last time. Does he have atter symptoms: Negots more tollow up.
FAC and dod help last time Does he have other symptoms:
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The state of the s

A-0543, page 97 of original document, additional references as added by State App-093

Note of a telephone call

TO: File, Syed FROM: Flohr

RE:

DATE: 3-2-99

12:27 PM [tel no], Dr Orzek -> Faxed [prescription] to Yvonne [illegible] Same rash, did help last time. Does he have other symptoms? Needs more follow up.

[illegible] faxed

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. virgini,	and an experience of the second secon	a kaliling gipundadiga girigini mengelikan kanggangdadi dan dalah milili meng	Ce Fidey 4	10-396-5	250
TO: File, Syea Plan: Fland	entragent of majoritation and advantage specific specification and a messes of the co. A > 2	andronistanis (1980) in the second	ada ausa sasa sasa sasa mendengan sasah sasa	angunggi, na statu antak i, sa mangun nga paminangan manguni mga mga dananga	
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A-0544, 98 of original document, additional references as added by State App-094

Note of a telephone call

[Upper right corner]
Mike Finley [two telephone numbers]

[from top]

TO: File, Syed FROM: Flohr

RE: J. Mitchell's request for DOB to [produce]

DATE: 3-2-99

12:22 PM [tel no], left spoke w/ Mike Finley, gave jail id #, location, protective custody, dob. Gave my pager # as well

The state of the s	saarinaa saadaalataid ee tiismaa gaamaasaa ja joo oo gaaraa ja is is joo oo
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	e ya madadda, gada awifii dagaan ahaagaan ahaa dagaa ahaa ahaa ahaa ahaa ahaa aha
1317AM 410-625-9109, Charles Dunn, left nee, 1	+ re; \(\(\)
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	and the second s

Page 96 of original document, additional reference as added by State App-092

Note of a telephone call

TO: File, Syed FROM: Flohr RE: Home Det DATE: 3-2-99

/i/7PM [tel no], Charlene Dunn, left name # re Defendant

	Mark 1 and
	TO: Fel Cel
***************************************	Contell
	r nam; rugg
	TO: File, Syel FRom: Flohr RE: Huse Arrest DATE: 3-29-99
	DATE 3-29-00
	10/1/15/22/19
	4:13PM 410-625-911, Alt Carrection Concepts left name of P. D.
	have the Co
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*. ***********************************	

A-0545, 99 of original document, additional references as added by State App-095

Note of a telephone call

TO: File, Syed FROM: Flohr RE: House Arrest DATE: 3-2-99

4:13 PM [tel no], Alt Correction Concepts, left home, # (pager) re: Defendant

The state of the s
TO: File, Syd
Pron: Plant
RE: Postput Request.
ME: 3-29-99
10105AM 410-878-8185, ASA South Rades
covering, 40-358-06++ tax. Expliced that
ne of lan attorney for O + we are opposing the
regrest for postport as our diet has been in
- I want + we wat him to go by court
sulappor I month + are west him to go by court. She indicated she has not head anything PC; approved of the postporent, I also asked whether this is her case
Se marched se so led bitter this is her care
of the postpored, lass asked who is
of a se explained se is covering it only a covering
4 she explained she is covering it only @ Walnuts + she is not appearing @ wint heaving
10:15 pm
to 4Am 410-878-80# 8058, Cam 17 Hell >
10:12 m 40-878-8= \$ 858 fm Miklell > 1 Waxman or to duty Judge 15 who we send a request to
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Note to File dated 3-29-99, in the handwriting of Chris Flohr, Bail Attorney for Adnan Sved.

Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501 XAEB COSA),

A-0547, page 101 of original PDF document, additional references as added by State App-097

Note of a telephone call

TO: File, Syed FROM: Flohr

RE: Postponement Request

DATE: 3-29-99

10:05 AM [tel no], ASA Sarah Reader covering, [fax no]. Explained that I am attorney for Defendant +

we are opposing the request for postponement as our client has been in jail for appx 1 month + we want

him to go b4 court. She indicated she has not heard anything. [illegible approval] of the postponement. I

also asked whether this is her case & she explained she is covering it only @ W[illegible] + she is not

appearing @ writ hearing.

10:12 AM [tel no], Pam Mitchell -> J Waxman or to duty Judge. is who we send a request to.

ik .	70: File, Syd
	PROM: Plater of Records Production of O. DATE: 3-31-99
era musiki manangi kanangi untumpun da	
(0155Am	1410 349-5380, Vidue Wash, in her box, on way stage into office, flag are in her box I captied (unted to make sure sle gets flood if flag d let her know flag are flere. Lisa (seci) confirmed receipt of jetters in support of O.
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10.57	m 410-396-5082 5052/53 J. Mittellisch fr3, Mike Finley, -> tilled to herst -> no problems of
	production> telled to seest -> no problems of
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3-50	PM 416-396-5052, J. Mitchells chambers Mitce Findery
3 50	
	the Stie Sheldon, 396-5010.
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A-0553, page 102 of original PDF document, Appendix references as added by State = App-098

Note of telephone calls

.....

TO: File, Syed FROM: Flohr

RE: Receipt of Records / Production of Defendant

DATE: 3-31-99

10:55 AM [tel no], ASA Vickie Wash, in her [illegible] on way into office, they are in her [illegible]. I explained

I wanted to make sure she gets them & if they'd let her know they are there. Lisa [illegible] confirmed receipt

of letters in support of Defendant

10:57 AM [tel no], J. Mitchell's chambers. Mike Finley, talked to sheriff, no problems of production.

3:50 PM [tel no], J. Mitchell's chambers. Mike Finley, fax # Sue Sheldon, [fax no]

3:54 PM [tel no], Sue Sheldon, case name, case #, date and Judge, transcript or video

Room 244 4-5 wks \$250 (could be \$2.50?) Court House East7 [illegible] days \$550 (could be \$5.50?) 21202overnights 7 [tel no]\$20 per tape TO: File, Syed
PROM: Flohr
DATE: 4-1-99

Coiled Bital got Sund Chandry's phone # called Sound Chandry & after specify priebly of his notter I spoke to him & I eligible of that we thought he would benefit from representations & if he has not hired an atty Nor does he have anyone he is considering, he can call Bris scholar + gave her # I abb spoke of Ein what diet & gave new & phone #.

A-0554, page 103 of original PDF document, Appendix references as added by State = App-099

Note of telephone call

TO: File, Syed FROM: Chris Flohr RE: Saad Chaudry DATE: 4-1-99

Called Bilal, got Saad's #. Called Saad, spoke briefly with his mother. Spoke to Saad. Explained that we thought he would benefit from representation and if he has not hire and attorney nor does he have anyone he is considering, he can call Erin Schaden and gave her number

Also spoke with Erin about client and gave name and phone #

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of probabil internations.

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Protecutiveto office

2 Seck chartagho)

Note from Defense file

Undated. Mention of bail hearing which took place on 31 March. Handwriting similar to but possibly not same as that of Chris Flohr, Bail Attorney for Adnan Syed. Another possible author is Douglas Colbert, another of Adnan's attorneys. Published online by Court of Special Appeals as part of State's 1 May 2017 Appendix of Cross Appellee (20170501_XAEB_COSA), A-0598, page 115 original PDF document, Appendix references as added by State = App-111. Additional information provided

1

(A) Carmen Hernandez is F.P.D. [Federal Public Defender] D.C.

information on Marshall's office from Extradition lawyer @ FPD

[At this point defense team don't know who "Larry Marshall" is, the expert (mis)named and misquoted by Wash in her "xenophobic" arguments at bail hearing on 30 March, actually Harry Marshall. Carmen H is currently a defense atty in D.C.]

(B) FOIA -> Marshall [Facts?] or letter to speak on factsC) Call an Embassy to make specific Demands

Car [possibly Care aka CAIR - see below]

MOSQUE

1.000 --> Drew

1,000 --> Thorston

Alert Rahman in writing

Re [with - struck through] Property [illegible struck through - ?Maters?]

Charlene Dunn

Family

Other support

Embassy - Waiver of Extradition, [Emb?ability - or Embassy something]

Vicki's arguments

Letter to Rahmans - Talk to people to get information not to relay private or protected information[end of page]

[top of next page]

3. Bail

- (a) Bail Hearing @ arraignments
- (i) Calculate worth of Properties
- (ii) Ask for Home Detention
- (iii) Pretrial Investigation

Bail Clerk

Path a motion [struck through illegible] for Bail would take-- Did they verify info - Value of property[arrow pointing to:]

[ilegible - TAD? or Jay Documents?]

FMU

-- Did they get Vicki['s] letter?

[line to the following notation on the left:] Vicki's arguments re: Embassy [to the right] - Transcript Vicki's letter

4. Care [possible transliteration of CAIR or Council on American-Islamic Relations, based in nearby Washington D.C,]

[N?] Adwad [Nihad Awad was Executive Director of CAIR in 1999]

George Beall [Baltimore atty]

Ben Cinlatti [sp?]

P.R. Pick[? a name?]

Complaint w/

State Dept

DOJ

[P?'s] Office [a dept or name?]

Seek donations



To: File, Syed FROM: Plohr RE: DATE: 4-1-99

5:05Pm 7 Nisha father/home bush

5:06m 202 -Erin Schaden

Larry Nathans

5.08m 410-7

Nisha home

5:201mappk) Arisha Nisha 7:30PM

AC: phone call

3১|⁻ Nisha mother

5:21Pm 443 - Adnan father

Syld (all plure) no anner.

51238m

っ (Nisha mother

Nisha Tanna

Swid we 7MM - 7:30PM, with to ask gristing don't show.

202-Nisha mother work? × 3158 Manjula lanna (cellular 703-

5,348M Sperling MAN

5:48/M 203-Nisha mother work 73758 703

dided Ix ohngag on.

5:50m 410-7 Larry Nathans - lung Withins 410-9 Larry Nathans rell

Schaden Schaden Nisha Tapped A west on etty 6:24Pm 301-Nisha mother + they said you don't need an arty. She said how about Morn. How want if I come + she said short notice, Thick Williams? Expliced all heroptions (as I didther doughter) producting specky not spelly him an etty - any of her choice. She Said she had none; Texpled I had an etty it she wited one that would be willing to talk to her. Whately she indicated she would sit where dengto- while they spoke to her tonight. Sand Churdry & mom \$75 KIN 10-110m tonight, Annat Chundry

A-0555,A-0556 page 104-105 of original PDF document, Appendix references as added by State = App-100, App-101

Note of telephone calls - summary not transcription

TO: File, Syed FROM: Chris Flohr

RE:

DATE: 4-1-99

16 calls made between 5:05 PM and 10:30 PM

Calls to Nisha T, Nisha's father, Nisha's mother, Saad Chaudry, Saad's mother, Saad's father, Erin Schaden defense attorney, Syed Rahman, Andrew Davis, Larry Nathan defense atty, Douglas Colbert - Adnan's other atty.

Summary of notes re: Nisha T, Nisha's father, Nisha's mother,

7:30 Det said female atty going with them tonight

Det R has [?] said call mom, said come 7-7:30 wants to ask questions, about half an hour [?] atty and they said you don't need an atty. She said how about Mom. How about if I come and she said short notice. Think Williams? Explained all her options as I did to her daughter) [?] speaking, not speaking, hiring an atty - any of her choice. She said she had none. I explained I had an atty if she wanted on that would be willing to talk to her. Ultimately she indicated she would sit w/her daughter while they spoke to her tonight.

TO: File Syed
FROM: FROM: FROM:
RE: Videlyce
DATE: 4-1-49

410-396 -5010

Sue Heldon

I week oder received

410-545-7764 dek Huly

My Steldon said it would take I week to order the tape & it could not go any faster

A-0557, page 106 original PDF document, Appendix references as added by State = App-102

TO: File, Syed FROM: Chris Flohr RE: Videotape DATE: 4-1-99

[410-XXX-XXXX]
Sue Sheldon
Tape
1 week order received
[410-different #]
desk & judge
Ms Sheldon said it would take 1 week to order the tape & it could not go any faster.

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TO: Fre, Syed	
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DATELLICIA	
Prom: Fuhr	
	(E.L.I.)
G:12m 410-396-5010 1	elt nee, # res muts (note the
markone did not say She S	holdonis name.
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App-104

A-0559, page 108 original PDF document, Appendix references as added by State = App-104

TO: File, Syed FROM: Chris Flohr RE: Transcripts DATE: 4-5-99

6:12 PM [410-XXX-XXXX]

left name # (Eastside) request minutes. (note the machine did not say Sue Sheldon's name.

TO: File, Syed From: Fisher RB: med DATE: 4-6-99

2:048m 410-486-7166, Dr Orzek on hold for 5 min. + no response.

A-0559, page 109 original PDF document, Appendix references as added by State = App-105

TO: File, Syed FROM: Chris Flohr RE: Medications DATE: 4-6-99

2:04 PM [410-XXX-XXXX]
Dr Orzek, on hold for 5 min and no response

Polomi Plots Polomi Plots No: Minutes DATE: 4-6-99

> 9AM Vaneth Nomis \$150 396-5011 \$20 602-8252

A-0561, page 110 original PDF document, Appendix references as added by State = App-106

TO: File, Syed FROM: Chris Flohr RE: Minutes DATE: 4-6-99 507 Ct West 9 AM Kenneth Norris \$150 [tel no] \$20 [tel no]

A-0563, page 112 original PDF document, Appendix references as added by State = App-108

[top right]
Tina office
[Cristina Gutierrez]

TO: File, Syed FROM: Chris Flohr

RE: Speaking w/ Defendant @ BCDC [Baltimore City Detention Center]

DATE: 4-7-99

Answering [Pi Symbol = plaintiff]'s comments -Failed 2x-

Psych 2/3 class dropped it
Call home = not turn in report before Christmas but did turn it in after
Stopped running track after county championships
College applications were due Feb 15th = deadline and Defendant dropped 2 wks
He started going to guidance counsellor every day afterward

Broke up 2x

Look for a really mean note Hae sent to Defendant around October Photo Defendant gave her and Defendant wrote on back where he said they would be friends forever

Scoriassis [psoriasis] - flaking [?] ears, hair

Jennifer P: Stephanie said Police Officers asked her questions - only other person connected w/ Jay

From: Flor RE. Cells DATE: \$-8-99 11:17Am 410-788-1064, Explicit to 0° mon Timisadrice re Seery Blad 11:20m 455-9762, Mr. Patel, left nae, #18: 11.25AM 410-486-7166 Dr. Orzele expliced.
What symptoms: lugues? - look for joint pais
61, blood is note stool, susitisty to sun. Doubted -62 396-5015 11:45Am 410-396-5013, yourse Davs ont Pareig to Dr. Adward 209-4093/4079. Edoyard Pr. Edonard 11:48m 410-396-209-4093 Pr. Edougal - not overlible, explicit spoke to Ms Duis who said she set it 209-4055 = Pay Pr. Edonard = a psychiatrist. Dr. Luke, Dr. Holiday. 11:58AM 410-209-4055, DOC'> Martha Neal > sick call slip , will borny Din, gave he loc # 4 info, see reverse

A-0564, page 113 original PDF document, Appendix references as added by State = App-109

TO: File, Syed FROM: Chris Flohr

RE: Calls DATE: 4-8-99

1117 AM [tel no] Explained to Defendant's mom Tina's [Gutierrez] advice re seeing Bilal.1120 AM [tel no]

Mr Patel, left name # [?]

1125 AM [tel no] Dr Orsek - explained what symptoms. Lupus? - look for joint pains, CI, blood in [?]/stool, sensitivity to sun. Doubtful but be aware of it.

Mr Patel [tel no] [tel no]

1140 AM [tel no]

1145 AM [tel no] Yvonne Davis sent prescription to Dr Adwar [tel no] Edouard [sp?]

1148 [tel no] Dr Edouard - not available, explained spoke to Ms Davis who said she sent it to Dr E close to 2wks ago. Dr Kite psych.[tel no] Dr Laka, Dr Holiday.

1158 AM [tel no] Docs -> Martha Neal - sick call slip - [?] will bring defendant in, gave her [?] # 4 info. See reverse

10. File, Syed 13. 4-14/99 chappense From Ploha I spoke to On pens, asked an other if I could speak to his family & return to speak to him. The other said yes cater I leaved that O had already been taken back. I called clock's obice or they did seacles in computer under name, it the and found nothing. They introded asse had not been filed. When I returned to ct my. Turveer said case was already called into record + He read the end # I imadiately requested case be re-called + I lesser did notice I had been in at since AM I make the filing and Catter introlly asking the fel. If whitershe had any into-she had not even have inf # @ that time. Then I requested recoglidaried. Case called into record again to after DAM, fited, in

A-0565, page 114 original PDF document, Appendix references as added by State = App-110

TO: File, Syed FROM: Chris Flohr

RE: 4/14/1999 Court appearance

DATE: 4/14/1999

I spoke to Defendant in pens, asked an officer if I could speak to his family and return to speak to him. The officer said yes. Later I learned that Defendant had already been taken back.

I called Circuit Court clerk's office and they did searches in computer under name, id number and found nothing. They indicated case had not been filed.

When I returned to court room, Tanveer said case was already called into record and [illegible] read the indictment number. I immediately requested case be re-callled and Judge Lesser did notice I had been in court since AM. I made the filing argument (after initially asking the fel. [pi symbol] whether she had any info - she did not even have indictment at that time) Then I requested recog (denied)

Case called into record again after 2PM, filed indictment