

## 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:

<https://undisclosed.wikispaces.com/space/content?tag=Individual+Flohr+Notes+and+Memos+from+XAEB>

Symbols used             $\Delta$  = Defendant (Greek letter Delta)

$\mathcal{P}$  = Plaintiff (Greek letter Pi)

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TO: Fde, Syed  
FROM: Plehr

RE: Transcript order  
DATE: 3-1-99

4:06 PM 410-878-8015, left mes, #res. 0's  
(page + home)  
bail review to order tape ASAP.

3/2/99 Spoke w/ Brian Hamer + 1 can pick up tape  
tomorrow.

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

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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.

TO: File, Syed  
From: Flohr  
DATE: 3-3-99

Greg Christopher  
410-962-3962

Frank Nattel best out here  
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

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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]

8 File, Syed  
 20m, Mohr  
 Et Ct Special Appeals  
 BDE. 3-2-15

JP 3-707

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

1) Cir Ct desk

Remind transmit quicker than usual  
 bec. of 10d time period

Quick turnaround → will greatly reduce  
 ruling @ time for filing of

Filing fee \$50<sup>to</sup> Circuit Court  
 & Cir Ct will charge \$60

No page limit, Be as thorough as can.  
 Ct not anticipate

Not app addressed to

Criminal App Div of Atty Gen Office.

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 than 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  
RE: Kerasbi's Investigator  
DATE: 3-2-99  
(Frank Nafetel  
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

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TO: File, Syed  
FROM: Chris Flohr  
RE: Kareski's investigator [sp?]  
DATE: 3-2-99

Frank Napfel  
[tel no]

WORK PRODUCT

TO: File, ~~Hand~~ Syed  
RE: Psych  
DATE: 3-3-99  
From: Flohr

Jerry notes

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

Good psych =

Ellen McDaniel very conservative & judges like her.

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: Fide, Syed  
RE: Spending w/Adnan  
DATE: 3-9-99

~~Passport~~

Email

Name of doc present b/f  
Bilal's relationship - not family  
Never been in car recently

Note: Personal prop <sup>sheet</sup> says hut + 8 and no hut +  
not know anything about it.

EMAIL: Syed <adnan@hotmail.com>

password: poppy

has set up.

Computer @ Mum's Dad's house

Last email about int + be friends ok.

Groups hurt her, ~~forks, PD-sec~~

Follow up

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

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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)?]

TO: Fido, Syed  
RE: Listening to Bail Review tape  
DATE: 3-24-99  
FROM: P 1ohr

10 yrs. Johnny case Rd.

5 mo. employed

\* → Not admit to any substance abuse  
No adult crim history nor Juvenile Record  
State's Atty Barbara Richman on behalf of Mike Cohen:

on tape

1:00

we do have a witness <sup>who was</sup> w/ <sup>the</sup> when the victim's body <sup>was</sup> buried  
and also

we have a witness who would say that he told him  
on the day that Mae Min Lee was killed that he was  
going to kill her."

Judge Hargrove: (I imagine you're asking had remain the same.

P

Dennis

Now accepted ~~plans~~ Plans to go to college

He has always lead a honest law abiding life

75-100 outside of rm.

Always a dutiful son

"Family's cousin" Patal

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

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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:

P

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



To: File, Syed  
From: Flohr  
RE: Misc Juv. Issues  
DATE: 3-5-09

speaking w/ David Addison  
"dadison@mail.opd.state.md.us"  
~~addison@not.com~~

"Motion to Transfer Jurisdiction to Juvenile Court"

Art 27 5594(a)

Criminal Court (a)

Entire case 1617 not eligible to juv. ct. transfer

"Waiver" "Recuse Waiver" "Transfer"

This stat is both money jail & jurisdiction.

3-828 Confid of Juv Records  
CJP

May be an educational but not see it.

Then Rights Watch was to do an interview

Michael Bochenek 212-216-1245  
"Bochenik"  
e-mail bochenm@hrw.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

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[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 Juvenile [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 Confidentiality of Juvenile Records  
CJP  
May be an educational but not see it

---

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

TO: Fida, Syed  
RE: medications  
From: Chris Pahr

DATE: 3-5-99

Note: Bilal gave me this info earlier this week.

Doctor: Bonnie Orzech  
Woodlawn Dermatologist

Med: AQUAPHOR mixed w/ EUCON  
01%

→ Bilal Ahmed



8411 Dr. Bonnie Orzech → not listed

~~443-225~~ Commer Center  
1777 Parkhurst Rd Ste 103  
Belt. - 21208  
"Woodholm Center"  
410-286-9444

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

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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]

89  
88  
19

TO: File, Syed  
Prom. Plehr  
RE: Spelling w/O  
DATE: 3-6-99

- Glasses
- Ltd resources of envelopes
- Charges/legal research

→ Self-addressed stamped 1 piece paper  
 (Add of jail) - w/ob 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 & support  
 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 GPA + 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 happens, its ok.

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

2

3-6-99

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

Ms Schaub = french teacher (Mae's teacher's aid <sup>for</sup> French).  
 △ thinks she had alot to do w/ △ breaking up. △ thinks another part of break up was raw b/f drove brand new ~~car~~ green. She was very superficial + would brag about her b/f driving BMW's, etc.

Mae's friends Asha Pittman + Debra Warren know Mae best.  
~~Mae~~ said a ~~year~~ prior b/f died in California in a car crash "Mike" (△ not know last name). △ ~~tho~~ not know where Mae was in Calif. but knows she was near ~~no~~ water beaches.  
 Mae's best friend "Salce" 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. Mae was out in Calif from about end of 9th grade until 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

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[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.



~~Utah~~

~~Let's go~~  
J. Shager

TO: File, Syed  
FROM: Plohr  
RE: Bail Review  
DATE: 3-9-99

9:29AM 410-878-8058, Pam - usually goes before the  
circuit judge is here for re-review.

9:33AM 410-878-8009, Lonnie Ferguson, busy.

10:39AM 410-878-8009, Audrey from Lonnie Ferguson's office  
J. Shager.

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

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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: F&E, Syed  
FROM: Flohr  
RE: School Records

DATE: 3-10-99

3:23PM <sup>410-</sup> 887-4060 Bob Haynes, not in bldg.  
Charline Scavetta not home answers yet?  
She'll call

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

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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

Finger

To: Fede, Syed  
From: Flohr  
RE: med.  
DATE: 3-11-99

11:12AM 396-5013, Yvonne Davis, left message, re: med for Syed.

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

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

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

1:05 PM - 2:30 PM  
 (2005477)

TO: File, Syed  
 From: Flohr  
 RE: Meeting @ BOC  
 DATE: 3-12-99

~~Let #?~~

~~Phone:~~

~~Board:~~

~~Call Bill:~~

~~William:~~

~~Other Phys:~~

Dion Taylor - See car as O, 2dr. Accord (O has 4dr)  
 Bushnell gave that key, Dion saw him & noted  
 O's car making funny noise. Costly fun wife was  
 worse, fixed 1-2 weeks after Baggio M+N Car  
 Care (family's mechanic). Baggio may be wary of  
 atty coming in. School schedule should list the  
 game. This happened @ 3:30 PM in front of school  
 front entrance to Bygones.

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

Yasir Ali - Donald not call him during day because  
 father always has the phone during 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#]

[main section]

TO: File, Syed  
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.



TO: File, Syed

FROM: Plohr

RE: Meds

DATE: 3-12-99

3:46pm 410-396-5013 Yvonne Davis

3:49pm 410-837-2135, Dr. Berman, no answer.

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

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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: Fide Speed

FROM: Flohr

RE: Speeding - / ~~Client~~ S Sand Chandy

DATE: 3-12-99

8:33AM

[REDACTED], Sand Chandy explained his right to speak to anyone he wishes + his right not to speak to anyone + can only be forced if subpoenaed + told by Judge to speak. He asked would he be liable if not speak what should he do. I answered I cannot make that decision for him. I also asked if he'd be willing to speak to our investigator, he said yes + I provided the # and asked him to call.

8:39AM 410-492-5513 Drew, explained he'd be getting call.

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 willing 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.

TO: Fido, Syed  
RE: Speaking to @ Justice  
DATE: 3-19-9

No notes since then up, long time ago wrote notes  
No signs con of violence no notes..

Think passport expired.

SS# [redacted] DOB 5-21-81

Living home: Mom, Dad, older brother Tan veer  
(21 - **College and course details - redacted**) younger brother  
9 yrs old wysut. Bilal = Sunday school teacher

12th grade top 5% class. EMT for part ambulance  
transport Rural MetroCorp, elderly patients.

EMT certified since 11 yrs old. Play football (base  
and track, started 2 yrs ago in Karvy @ Woodburn  
Middle School PAL Recreation help in events ages 5-10  
National Honor Society (member since this year)  
Highest grade in EMT

Colleges UMBC + College Park w/pretty results in

2  
3-1-99

April. Interested in pre-med, ER med.

Not signs - 4 initials on window + sign bottom.  
They wrote down what classes Period 1 MS course  
Period 2 Eng or Soc Studies. Work times 7:50-9:15  
9:20-10:45 AM. They have 2d + 4th No tapes/notes

(They have 2d + 4th period class together (4th period) = Psych). O saw her in both classes.

PO said O solicited Swann to do it tentress  
can O check her + heavy body. Put her in trunk  
How sleep e night seeing her face in trunk and hole  
must eat you up in side. O 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 + cloth samples.  
Nothing said about blood or DNA. PO said O  
wearing red gloves. They returned Jay Wilder  
788-8495 g/f Stephanie (good friend of O) 788-8574  
works @ pawn store on Sulphur Spring Road  
near landsdown. Lives off Rt 40 near Sarentos  
Purple T done. Why would you trust a  
black guy who puts pins through 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 interrogation..

---

TO: File, Syed  
RE: Speaking with [delta/triangle symbol for Defendant] @ Juv[enile] Facility  
DATE: 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.

2

3-20-54

Approx 1:20 PM I made the following objections to Sgt Bonaparte + I specifically asked him if he could hear me across the room + he said yes (I had been initially told by the Sgt B to stay in living room area). I made the following objections:

1) Warrant was overbroad 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 pit home of these people.

3) Objected to warrant stating "persons premises ~~and~~ 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 alone is enough to invalidate the warrant.

5) <sup>objected</sup> Nothing in affidavit supports facts of the warrant  
nothing in affidavit suggests there is anything in the house.

Note: Det Ritts white, mustache greying jeans + black Belt City shirt.

Officer R. Williams African American, uniform Belt Co. Woodlawn Pct 2.



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

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[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]

TU File, Syed  
Rahmipour  
RSI

DATE: 3-26-99

3:02pm 410-396-5013, Yvonne Davis

Fax #: 625-2766

Treat SUCS Ms. McCall 410-204-4063

3:12pm 410-486-9444 Dr. Bunn Drzeck, gave info,  
asked to fax.

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

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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: Fide, Syed  
FROM: Flohr

RE:

DATE: 3-29-99

12:27 PM 410-486-7166, Dr. Orzech → Fixed prescrip to Yvonne  
IEA, some rash, did help last time. Does he have other symptoms?  
Needs more follow up.

She fixed

Note to File dated 3-2-99, A-0543, 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-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

Mike Finley 410-396-5052  
410-396-5052

TO: File, Syed  
FROM: Pldnr

RE: J. Mitchell's request for DOB to produce  
DATE: 3-29-99

12:22PM 410-396-5052, ~~left~~ spoke w/ Mike Finley,  
gave jail id #, location, protective custody, dob. Gave  
my pager # as well.

Note to File dated 3-2-99, A-0544, 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-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

TO: Fke, Syed

FROM: Plohr

RE: Home Det

DATE: 3-29-99

13/7PM 410-625-9109, Charlene Dunn, left message #res Δ



Note to File dated 3-2-99, A-0542, 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),

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

TO: Fide, Sjed  
From: Flohr  
RE: House Arrest  
DATE: 3-29-99

4:13PM 410-625-9111, Alt Correction Concepts, left  
name, # <sup>(pages)</sup> re: D.

Note to File dated 3-2-99, A-0545, 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-0545, 99 of original document, additional references as added by State App-095

Note of a telephone call

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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

TO: File, Syed  
 FROM: Flohr  
 RE: Postponement Request  
 DATE: 3-29-99

10:05 AM 410-878-8185, ASA Sarah Reader  
 covering 410-358-0677 fax. Explained that  
~~we are~~ I am attorney for D + we are opposing the  
 request for postponement as our client has been in  
 jail approx 1 month + we want him to go b4 court.  
 She indicated she has not heard anything re: approval  
 of the postponement. I also asked whether this is her case  
 & she explained she is covering it only @ Wednesday  
 + she is not appearing @ writ hearing.

10:12 AM  
~~10:11 AM~~ 410-878-~~8185~~ 8158, Pam Mitchell →  
 J. Waxman or to duty Judge. is who we send a  
 request to.

Note to File dated 3-29-99, 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-0547, page 101 of original PDF document, additional references as added by State App-097

Note of a telephone call

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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.

TO: File, Supd  
 FROM: Plohr  
 RE: receipt of records/production of O.  
 DATE: 3-31-99

10:55 AM 410 396-5380<sup>ASA</sup>, Vidette Wash, in her box,  
 on way ~~to~~ into office, they are in her box  
 I explained (wanted to make sure she gets them &  
 if they'd let her know they are there. Lisa (seci)  
 confirmed receipt of letters in support of O.

10:57 AM 410 396-~~5082~~ 5052/53 J. Mitchell's chambers,  
 Mike Finley, → talked to her → no problems w/  
 production.

3:50 PM 410 396-5052, J. Mitchell's chambers, Mike Finley  
 fax# Sue Sheldon, <sup>410-</sup>396-5010.

3:54 PM 410-396-5010 Sue Sheldon  
 Case NAME, <sup>case</sup> #, date + judge, transcript  
 or video.

Rm 244 4 Sales \$250  
 Ct Herz East 7 1/2 days \$550  
 21202 over \$7.  
 410-545 766A \$20 per tape

Note to File dated 3-29-99, 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-0553, page 102 of original PDF document, Appendix references as added by State = App-098

Note of telephone calls

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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 East 7 [illegible] days \$550 (could be \$5.50?)  
21202 overnights 7  
[tel no] \$20 per tape

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

Called Bital, got Saad Chaudry's phone #, called Saad Chaudry & after speaking briefly of his matter I spoke to him & I explained that we thought he would benefit from representation & if he has not hired an atty nor does he have anyone he is considering, he can call Erin Schuler & gave her #.

I also spoke w/ Erin about diet & gave her # & phone #.



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

Note of telephone call

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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 #

I (A) Carnes knowledge in FBI etc.  
- ~~the~~ information on Marshall's  
other from ~~the~~ Extradition lawyer  
@ KPD

- (B) FOIA or letter to people re facts <sup>Marshall Facts?</sup>
- (C) Call on Embassy to make specific demands

Car  
MSJAVE

~~CA~~

1,000 → Drew  
6,000 → Thurston

Alert Rhames in writing  
the ~~the~~ Property Holdings  
Christine's POW  
Family  
Other supports  
→ Embassy - view of extradition, Extradition  
Vickie's arguments

Letter to Rhames - Talk to people to  
get interviews not to relay provide  
or protected interviews

3. Bail

(a) Bail Hearing @ arraignment

(i) Calculate Worth of Properties

(ii) ~~Issue~~ Home Detention

(iii) Pretrial Investigation

Bail Clerk

Path a  
noted ~~was~~  
for Bail would take

→ Did they verify info - Value of property

→ Did they get Vicki's letter

↓  
TAM Records  
FNU

4.

Care

Mikael Adwan

→ George Beall

→ Ben Ciriotti

→ P.R. New

→ Complaint at  
State Dept  
DOT

Prosecutor's office

→ Seek ~~objection~~

Transcript

Vicki's letter

Vicki's  
arguments  
re: Embassy

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:]

[illegible - 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

5:05 PM 7 Nisha father/home, busy

5:06 PM 202 Erin Schaden

40- Larry Nathans

5:08 PM 410-7 Nisha home

5:20 PM approx Nisha → Nisha 7:30 PM  
Det said send ably going w/ them tonight.  
AC: phone call.

5:21 PM 301- Nisha mother  
443- Adnan father

Syed (cell phone) no answer.

5:23 PM 301- Nisha mother Nisha Tanna

stop Det R? has subp, said call mom.  
Said line 7 PM - 7:30 PM, wants to ask questions  
about 1/2 hour.

202- Nisha mother work x 3158 Manjula Tanna  
(cellular 703- [redacted])

5:34 PM Speaking w/ Drew

5:48 PM 202- Nisha mother work x 3158 703- [redacted]

dialed 2x & hung up on.

5:50 PM 410-7 Larry Nathans, Larry Nathans

410-9 Larry Nathans cell

p. 2

5:56PM 3102-543- [redacted] Bin Schaden

5:57PM 410-299- [redacted] Doug Colbert

6:24PM 301- [redacted] Nisha mother Nisha Tanager <sup>mother Manjula Tanager</sup> A want an atty + they said you don't need an atty. She said how about Mom. How about if I come + she said short notice. Think Williams? Explained all her options (as I did to her daughter) including, speaking, not speaking, hiring an atty - any of her choice. She said she had none. I explained I had an atty if she wanted one that would be willing to talk to her. Ultimately she indicated she would sit w/ her daughter while they spoke to her tonight.

6:43PM 410- [redacted] Nisha Putter.

6:45PM 410- [redacted] Sand Chandray's mom \$75/hr. → 10-11pm tonight, Anwar Chandray

8:21PM 210- [redacted] Anwar Chandray - not in, will be back in 1hr.

10:30PM 410- [redacted] Chandray

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-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: Clerk  
RE: videotape  
DATE: 8-1-99

410-396-5010

Sue Sheldon

Tape

1 week order received

410-545-7764

date to judge

Ms. Sheldon said it would take 1 week to order  
the tape & it could not go any faster.



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

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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.

TO: Fide, Syed

RE: Transcripts

DATE: 4-5-99

ROOM: Fluhr

6:12pm 410-396-5010, left msg, <sup>(Eastside)</sup> & res mnts (note the  
machine did not say Sue Sheldon's name.

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

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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: FWHC  
RE: med

DATE: 4-6-99

2:04pm 410-486-7166, Dr Orzek, on hold for  
5 min. + no response.

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-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

TU File, Syed  
Ploomi Plobr  
NB: Minutes  
DATE: 4-6-99

507 Chest.  
9AM  
Kenneth Norris  
\$150  
396-5011 \$20

602-8252

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

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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]

Tina office

TO: Fide, Syed

RE: speaking w/  $\Delta$  @ BCDC

DATE: 4-7-99

Room: R610

Answering T's comments.

- Failed 2X -

Psych 2/3 class dropped it

- Cell home = not turn in report 64 times but did turn it in after.

- Stopped running track after county championships  
College apps were due Feb 15th = deadline + O dropped out.  
He started going to guidance counselor every day afterwards

- Broke up 2X

- Look for a really mean note that was sent to  $\Delta$  around October.  
Photo  $\Delta$  gave her + O wrote on back where he said they would be friends forever.

- Scarsis  $\rightarrow$  flaking out ears, hair.

- Jennifer Pusateri: Stephanie said PV<sup>3</sup> asked her questions  $\rightarrow$  only other person connected w/ Jay



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

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[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

TO: Fite, Syed  
FROM: Ffhr  
RE: Calls  
DATE: 8/8/99

11:17AM 410-788-1064, Explained to O's mom Tim's advice re seeing 13.1st.

11:20AM 455-9762, Mr. Patel, left msg, #re:

11:25AM 410-486-7166, Dr. Orzele - explained what symptoms. Lupus? - look for joint pain, GI, blood in urine/stool, sensitivity to sun. Doubtful but beware of it.

Mr. Patel  
410-  
383-  
5703

~~11:40AM~~ 410-~~622-396~~ 396-5013

11:45AM 410-396-5013, Yvonne Davis sent prescrip to Dr. Edouard <sup>410</sup> 209-4093/4079 Edouard

Dr. Edouard  
11:48AM 410-~~396~~ 209-4093, Dr. Edouard - not available, explained spoke to Ms Davis who said she sent it to Dr. Edouard, close to 2 weeks ago. <sup>Edouard</sup> Dr. Kite = psych. 209-4055 = Pres, Dr. Edouard = a psychiatrist, Dr. Linka, Dr. Holiday.

11:58AM 410-209-4055, Doc's → Martha Neal → sick call slip, I will bring Δ in, gave her loc # & info. see reverse

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.  
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A-0564, page 113 original PDF document, Appendix references as added by State = App-109

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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

TO: File, Speed  
 RB. 4-14/99 at my presence  
 DATE: "  
 From: Flohr

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

I called <sup>circ</sup> clerk's office & they did searches in computer under name, id# and found nothing. They indicated case had not been filed.

When I returned to ct m, Turner said case was already called into record & she read the ind #. I immediately requested case be re-called & Turner did notice I had been in ct since AM. I made the filing arg. (after initially asking the fel. If letter she had any info she did not even have ind.# @ that time). Then I requested recog (denied)

Case called into record again & after 2PM, filed, id

Note to File in the handwriting of Chris Flohr, Bail Attorney for Adnan Syed.  
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Appellee (20170501\_XAEB\_COSA),

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

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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-called 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