

Cited Excerpts of Post-Conviction
Hearing Testimony from Sean Gordon
(2/5/2016) (Pages 12, 52, 62)

COPY

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ADNAN SYED v. STATE OF MARYLAND
February 5, 2016 BEFORE MARTIN P. WELCH, JUDGE

ADNAN SYED,	*	IN THE
	*	
Petitioner,	*	CIRCUIT COURT
	*	
V	*	FOR
	*	
STATE OF MARYLAND,	*	BALTIMORE CITY
	*	
Respondent.	*	199103042-46
	*	
* * * * *	*	

TRANSCRIPT OF OFFICIAL PROCEEDINGS
(A.M. SESSION - Post-Conviction Hearing)

BEFORE: THE HONORABLE MARTIN P. WELCH, JUDGE

HEARING DATE: February 5, 2016

APPEARANCES:

For the Petitioner: C. Justin Brown, Esquire
Christopher C. Nieto, Esquire

For the State: Thiruvendran Vignarajah, Esquire, DAG
Matthew Krinski, Esquire, DAG
Tiffany L. Harvey, Esquire, DAG

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1 duplicated, I believe.
2 Q. All right. So if we look at the bottom of the
3 first page of that exhibit, right --
4 A. Yes.
5 Q. -- there are three names there starting with
6 Mohammed Ali Khan (phonetic)?
7 A. Ali Khan, yes.
8 Q. Ali Khan, okay. Those three, correct?
9 A. Yes.
10 Q. And if we look at the following page, they are
11 the same three names that are up there as well?
12 A. Yes.
13 Q. So they are duplicates?
14 A. Yes.
15 Q. Okay. So there's in reality 83 names on this
16 list?
17 A. Yes.
18 Q. Okay. Did you endeavor or try to contact any of
19 the people listed in this notice of alibi?
20 A. Yes, I did.
21 Q. How many people were you able to contact?
22 A. I was able to talk to 41.
23 Q. Okay. Of those -- I'm sorry. I didn't mean to
24 cut you off.
25 A. No. Forty-one.

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1 A. Yes.

2 Q. And it's a reference to Drew who presumably is

3 Drew Davis, the investigator again?

4 A. Yes.

5 Q. Now did you talk with Mike Lewis?

6 A. No.

7 Q. In order to find out who he contacted in

8 connection with this case? Did you talk to him before you

9 went and tried to talk to the 40 individuals?

10 A. Don't know.

11 Q. Mr. Lewis is still alive, right?

12 MR. NIETO: Objection, Your Honor. It's outside

13 the scope again.

14 THE COURT: Sustained.

15 Q. Well, I'm just trying to understand, you could

16 have -- your task, as I understand it, was to make contact

17 with the alibi witnesses, and find out which of them had

18 been contacted by Ms. Gutierrez's original team, right?

19 A. Yes.

20 Q. Ms. Gutierrez is no longer with us, right?

21 A. Yes.

22 Q. Drew Davis is no longer with us, right?

23 A. Yes.

24 Q. But Calliope and Mike Lewis are, right?

25 MR. BROWN: Objection, scope.

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1 respect to the memos that you were shown, was there any
2 indication of where the phone numbers for the track team
3 members were obtained?

4 A. No. And just to clarify, I was shown one
5 additional memo not -- there wasn't multiple memos.

6 Q. Okay. Was that additional memo something that
7 was in -- did that additional memo indicate how the phone
8 numbers were obtained?

9 A. No.

10 Q. Going to show you A0195, 0196 and 0197. This is
11 the same thing we saw before, right, but it's blank?

12 A. Yes.

13 Q. And this is the same memo that's got some
14 handwriting and a post-it note, right?

15 A. Yes.

16 Q. And this post-it note says, "Friends with or
17 football team friends," right?

18 A. Yes.

19 Q. And there's some handwriting on this as well,
20 correct?

21 A. Yes.

22 Q. And you're not aware or you're not sure whether
23 this is Cristina's handwriting; do you know that?

24 A. No.

25 Q. And this memorandum also includes information

Cited Excerpts of Post-Conviction Hearing Testimony from David Irwin (2/5/2016) (Pages 123-25, 128, 148-149)

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1 A Yes.
2 Q And also relevant to the cell tower issue?
3 A That's correct.
4 Q Okay. Have you also looked at the filings of
5 both of the sides?
6 A I have.
7 Q So you are familiar with sort of the Defense
8 version of the facts?
9 A I am.
10 Q But also with the State's version of the facts?
11 A I am.
12 Q Okay. And you have had a chance -- we -- the
13 State introduced an exhibit consisting of the attorney
14 file. Have you had a chance to review that a little bit?
15 A Briefly.
16 Q Very briefly, okay.
17 A I think it was produced to you on February 2nd.
18 Q I think that's correct. Although in all
19 fairness it was our file, so --
20 A I understand.
21 Q -- it was in our possession.
22 A I've seen some stuff from your file and I've
23 seen the A Exhibits and I think they were denominated by
24 the State.
25 MR. BROWN: Your Honor, at this time we would

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1 offer Mr. Irwin as an expert in criminal defense practice
2 and Brady disclosure duties of the prosecutor.

3 MR. VIGNARAJAH: No objection, Your Honor.

4 THE COURT: Just one second.

5 All right, there's no objection to the motion or
6 is there any voir dire?

7 MR. VIGNARAJAH: No, Your Honor, thank you.

8 THE COURT: The Court does find that Mr. Irwin
9 is in fact an expert in the practice, or the field of the
10 defense practice as well as I guess Brady disclosure
11 obligations of a prosecutor.

12 MR. BROWN: Thank you, Your Honor.

13 All right, so I want to ask you some question
14 about alibis and I'm going to start in the general and
15 then at some point I will move into the specific. And
16 there's one other thing that I forgot to ask you before,
17 but I just want to make it clear. And maybe it's known to
18 the Judge because you've been around the courtroom, have
19 you had a chance to observe portions of this hearing?

20 MR. IRWIN: Yes, some of it's very interesting.

21 MR. BROWN: Okay.

22 MR. IRWIN: Some of it's not.

23 BY MR. BROWN:

24 Q Okay. So again we'll talk about alibi in
25 general. And I'm going to ask you some questions that

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1 might quite frankly seem silly, but nonetheless we need to
2 put this on the record. What is the role of investigation
3 in defending a criminal case?

4 A Well, first of all, by ABA standards, by
5 training, the investigation of all relevant facts, all
6 potential avenues of defense are mandated by the defense
7 attorney and his or her team or associates to prepare for
8 a trial, plea bargaining, whatever, but you're supposed to
9 do prompt investigation of all lines of defense which
10 would include alibi.

11 Q Okay. Now could attorneys, whether they be
12 defense attorneys perhaps even other kinds of attorneys,
13 can they make strategic decisions without having first
14 investigated?

15 A No.

16 Q What is an alibi witness?

17 A An alibi witness is a witness who can place the
18 defendant at a location other than the location of the
19 crime at the appropriate, relevant time.

20 Q And what is the significance of an alibi
21 witness?

22 A Well, the significance of an alibi witness is
23 that if for the Defense if you have a credible alibi
24 witness that's the best possible defense you can have.

25 Q If you have a credible alibi witness that's the

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1 hands-on approach. You have to at least send an
2 investigator or some associate to talk to the witness and
3 then have some sort of analysis. Without facts there can
4 be no strategy. Without intelligence there can be no
5 strategic decision.

6 Q Right. And part of the reason, if I'm correct
7 part of the reason it's so important to investigate in
8 this thorough manner is that there is some risk to putting
9 on an alibi witness, correct?

10 A Correct.

11 Q And what's that risk?

12 A Well, the risk is if you put on an alibi witness
13 that seems incredible to the finder of fact then you lose
14 your credibility with the finder of fact and that would be
15 -- that could be detrimental to the defense.

16 Q Right. Now are there times when an attorney
17 does not need to investigate an alibi witness?

18 A I can't think of any time that that could be
19 possible.

20 Q Are there times when the attorney does not need
21 to contact the alibi witness?

22 A I cannot think of a reason that that would be --
23 there may be some reason like the person's death notice is
24 in the paper or something. I can't think of a reason that
25 a live alibi witness isn't somebody you need to talk to.

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1 opinion based upon everything including what was not known
2 to her but you discovered afterwards; does that make
3 sense?

4 MR. BROWN: Thank you, Your Honor.

5 MR. VIGNARAJAH: Thank you.

6 (At 1:52:00 p.m., Counsel returned to trial tables
7 and the following occurred in open court:)

8 THE COURT: Objection duly noted.

9 MR. VIGNARAJAH: Thank you, Your Honor.

10 THE COURT: You may proceed, Mr. Brown.

11 BY MR. BROWN:

12 Q Okay, so now I'm going to ask the question again
13 but in the more broader term. Based on everything you
14 know, everything you've seen, everything you've read, what
15 would have been Asia McClain's significance to that trial
16 if she had been called as a witness in 2000 in a case of
17 State v. Adnan Syed?

18 A My opinion is based on what should have been
19 done. I get the whole picture you're looking for, but
20 what should have been done by Ms. Gutierrez and her team
21 back in 1999 and that is that on the basis of what she had
22 then and what she was on notice of then, she had to meet
23 the minimal objective standard of reasonable defense care.

24 She had to go talk to Asia McClain. She had to
25 investigate what Asia McClain was saying and she had to

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1 then determine if -- she had to investigate the two young
2 guys that were with her. She had to go talk to them.
3 Somebody had to talk to those people because the testimony
4 could have been critical.

5 Q Okay.

6 A And now we know, so everybody can have their
7 record, now we know that Asia McClain is a fabulous
8 witness, lovely lady, credible, intelligent and she would
9 have been material and changed the ball game's result.
10 It's pretty obvious to me.

11 Q Okay. Do you have an opinion of what Asia
12 McClain would have been like then as a witness from your
13 experience from what you've seen?

14 A Well, she might not have been as polished, but
15 she would have been instead of a diamond she would have
16 been a diamond in the rough and therefore probably even
17 more likable and more believable.

18 Q The State when they cross examined Asia McClain
19 they asked a lot of questions --

20 THE COURT: Just one second, please, Mr. Brown.

21 (Off record discussion between Court and Clerk.)

22 THE COURT: I'm sorry, Mr. Brown.

23 MR. BROWN: No problem, Your Honor.

24 Do you remember in the cross examination of Ms.
25 McClain there was a series of questions that we'll refer

Cited Excerpts of Post-Conviction Hearing Testimony from Steven Mills (2/8/2016) (Page 229)

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February 8, 2016 BEFORE MARTIN P. WELCH, JUDGE

ADNAN SYED,	*	IN THE
	*	
Petitioner,	*	CIRCUIT COURT
V	*	
	*	FOR
	*	
STATE OF MARYLAND,	*	BALTIMORE CITY
	*	
	*	CASE NO. 199103042-46
	*	
	*	POST CONVICTION NO.
	*	10432
* * * * *	*	* * * * *

TRANSCRIPT OF OFFICIAL PROCEEDINGS
(Excerpt of Proceedings - Post-Conviction Hearing)

BEFORE: THE HONORABLE MARTIN P. WELCH, JUDGE

HEARING DATE: February 8, 2016

APPEARANCES:

For the State:	THIRUVENDRAN VIGNARAJAH, ESQUIRE
	TIFFANY L. HARVEY, ESQUIRE
	MATTHEW KRIMSKI, ESQUIRE
For the Defendant:	C. JUSTIN BROWN, ESQUIRE
	CHRISTOPHER NIETO, ESQUIRE

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1 A Yes, sir.

2 Q Could you tell the Court what you meant by that?

3 A Well, on that particular -- most of the students
4 would come in, you know, every day just as they normally
5 would and for the regulars, I knew the regulars and they
6 knew me. If he was an outsider, they'd have stood out.
7 It was somebody who didn't calmly come to the library.

8 Q Do you recall if students at the school would
9 sometimes be picked up from the public library?

10 A Yeah. Many of them would. Many of them would.

11 Q And do you recall any people from the sports
12 teams coming to the public library?

13 A Occasionally, the track team, would come after
14 practice but, you know, that was after practice.

15 Q After practice?

16 A Uh-huh.

17 Q How about individuals on other sports teams, do
18 you remember?

19 A Some of them would also come, too, but they
20 would usually come a little later because, you know,
21 practice was late. That's where they would get picked up
22 from, the library.

23 Q I'm just going to show you what I've marked as
24 State's Exhibit 12. This is already in evidence as A0374.
25 I'm sorry. Forgive me. Mr. Nieto.

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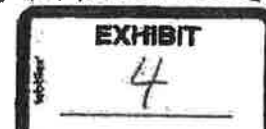
Handwritten Letter of Asia McClain (3/1/1999)

it's late.

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

Dear Adnan, (hope I sp. it right)

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



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

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

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

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

Asia McClain

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

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

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

Your Amiga

Asia McClain

Typed Letter of Asia McClain (3/2/1999)

Adnon Syed #992005477
301 East Eager Street
Baltimore, MD. 21202

Dear Adnon,

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

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

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

March 2, 1999

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

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

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

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

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

March 2, 1999

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

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

Asia R. McClain

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

Asia R. McClain
6603 Marott Drive
Baltimore, MD 21207

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

March 2, 1999

Affidavit of Asia McClain (3/25/2000)

Affidavit

A.R.M.

Asia McClain having been
duly sworn, do depose and state:

I am 18 years old. I
attend college at Catonsville
Community College of Baltimore
County. In January of 1999,
I attended high school at
Woodlawn Senior High. I
have known Aamin Syed
since my 9th grade freshman
year (at high school). On 1/13/99,
I was waiting in the
Woodlawn Branch Public Library.
I was waiting for my bike from
my boyfriend (2:20), when I spotted
Mr. Syed and held a ~~15~~ 15-20
minute conversation. We talked
about his girlfriend and he seemed
extremely calm and very caring.
He explained to me that he just
wanted her to be happy. Soon
after my boyfriend (Derrick Banks)
and his best friend (Marcel Johnson)
came to pick me up. Spoke to Aamin (briefly)
and we left around 2:40.

EXHIBIT

2

A.R.M.

No attorney has ever contacted me
about January 13, 1999 and the
above information

Asia McClain 3/25/00

Charles L. Syed, Attorney

My cell number 407-557-1144

Affidavit of Asia McClain (1/13/2015)

ASIA MCCLAIN

1. I swear to the following, to the best of my recollection, under penalty of perjury:
2. I am 33 years old and competent to testify in a court of law.
3. I currently reside in Washington State.
4. I grew up in Baltimore County, MD, and attended high school at Woodlawn High School. I graduated in 1999 and attended college at Catonsville Community College.
5. While a senior at Woodlawn, I knew both Adnan Syed and Hae Min Lee. I was not particularly close friends with either.
6. On January 13, 1999, I got out of school early. At some point in the early afternoon, I went to Woodlawn Public Library, which was right next to the high school.
7. I was in the library when school let out around 2:15 p.m. I was waiting for my boyfriend, Derrick Banks, to pick me up. He was running late.
8. At around 2:30 p.m., I saw Adnan Syed enter the library. Syed and I had a conversation. We talked about his ex-girlfriend Hae Min Lee and he seemed extremely calm and caring. He explained that he wanted her to be happy and that he had no ill will towards her.
9. Eventually my boyfriend arrived to pick me up. He was with his best friend, Jerrod Johnson. We left the library around 2:40. Syed was still at the library when we left.
10. I remember that my boyfriend seemed jealous that I had been talking to Syed. I was angry at him for being extremely late.
11. The 13th of January 1999 was memorable because the following two school days were cancelled due to hazardous winter weather.
12. I did not think much of this interaction with Syed until he was later arrested and charged in the murder of Hae Min Lee.
13. Upon learning that he was charged with murder related to Lee's disappearance on the 13th, I promptly attempted to contact him.
14. I mailed him two letters to the Baltimore City Jail, one dated March 1, the other dated March 2. (See letters, attached). In these letters I reminded him that we had been in the library together after school. At the time when I wrote these letters, I did not know that the State theorized that the murder took place just before 2:36 pm on January 13, 1999.
15. I also made it clear in those letters that I wanted to speak to Syed's lawyer about what I remembered, and that I would have been willing to help his defense if necessary.
16. The content of both of those letters was true and accurate to the best of my recollection.

17. After sending those letters to Syed in early March, 1999, I never heard from anybody from the legal team representing Syed. Nobody ever contacted me to find out my story.
18. If someone had contacted me, I would have been willing to tell my story and testify at trial. My testimony would have been consistent with the letters described above, as well as the affidavit I would later provide. *See below.*
19. After Syed was convicted at trial, I was contacted by a friend of the Syed family named Rabia Chaudry.
20. I told my story to Chaudry on March 25, 2000, and wrote out an affidavit, which we had notarized. (Affidavit attached).
21. The affidavit was entirely accurate to the best of my recollection and I gave it by my own free will. I was not pressured into writing it.
22. At the time when I wrote the affidavit I did not know that the State had argued at trial that the murder took place just before 2:36 pm on January 13, 1999.
23. After writing the affidavit and giving it to Chaudry, I did not think much about the Syed case, although I was aware he had been convicted and he was in prison.
24. Eventually I left Maryland and moved to North Carolina and then out west.
25. In the late spring of 2010, I learned that members of the Syed defense team were attempting to contact me. I was initially caught off guard by this and I did not talk to them.
26. After encountering the Syed defense team, I began to have many case questions that I did not want to ask the Syed defense team. After not knowing who else to contact, I made telephone contact with one of the State prosecutors from the case, Kevin Urick.
27. I had a telephone conversation with Urick in which I asked him why I was being contacted and what was going on in the case.
28. He told me there was no merit to any claims that Syed did not get a fair trial. Urick discussed the evidence of the case in a manner that seemed designed to get me to think Syed was guilty and that I should not bother participating in the case, by telling what I knew about January 13, 1999. Urick convinced me into believing that I should not participate in any ongoing proceedings. Based on my conversation with Kevin Urick, the comments made by him and what he conveyed to me during that conversation, I determined that I wished to have no further involvement with the Syed defense team, at that time.
29. Urick and I discussed the affidavit that I had previously provided to Chaudry. I wanted to know why I was being contacted if they already had the affidavit on file and what the ramifications of that document were. I never told Urick that I recanted my story or affidavit about January 13, 1999. In, addition I did not write the March 1999 letters or the affidavit because of pressure from Syed's family. I did not write them to please Syed's family or to get them off my back. What actually happened is that I wrote the affidavit because I wanted to provide the truth about what I remembered. My only goal has always been, to provide the truth about what I remembered.

30. I took, and retained, contemporaneous notations of the telephone conversation with Urick.
31. Sometime in January of 2014, I had a conversation with Sarah Koenig, a reporter for National Public Radio. I spoke to her on the phone and she recorded the conversation. It was an impromptu conversation and I misunderstood her reasons for the interview and did not expect it to be broadcasted to so many people. While Ms. Koenig did not misrepresent herself or the purpose of the conversation and interview, it is fair to say that I misconstrued that it was a formal interview that would be played on the Serial Podcast. I rather thought that it was a meticulous means of information gathering, for a future (typed) online news article. Due to dialogue with Jerrod Johnson in 2011 concerning Derrick Banks, I recommended that Sarah Koenig reach out to both Jerrod Johnson and Derrick Banks, to see if they remember January 13, 1999. Later on, when Sarah Koenig asked to re-record my statement in a professional sound studio, I became confused and unwilling to participate in any further interview activity. As a result my interview with Sarah Koenig was incomplete in the Serial Podcast.
32. After I learned about the podcast, I learned more about Koenig's reporting, and more about the Syed case. I was shocked by the testimony of Kevin Urick and the podcast itself; however I came to understand my importance to the case. I realized I needed to step forward and make my story known to the court system.
33. I contacted Syed's lawyer, Justin Brown, on December 15, 2014, and told him my story. I told him I would be willing to provide this affidavit.
34. I am also willing to appear in court in Maryland to testify, if subpoenaed.
35. I am now married, and my legal surname is no longer McClain. However, due to the wealth of publicity that this case has had, and the fact that all previous mention of my name has been with my maiden name, I am signing below as Asia McClain.
36. I have retained counsel in Baltimore, Gary Proctor, and I respectfully ask that any attempts to contact me be made through him.
37. I have reviewed this affidavit with my attorney before providing it to Syed's attorney, Justin Brown.


ASIA McCLAIN

DATE 1/13/15

Billing Summary for March 1999 (from defense file, A-0374)

Billing Summary for Adnan Syed

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

Total Hours: 39.75 Total Miles: 582

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

Memo to Cristina Gutierrez re:
Interview with Adnan's
Brother, Ali (August 21, 1999)
(from defense file, A-0150)

MEMORANDUM

TO: MCG

FROM: ALI

DATE: AUGUST 21, 1999

RE: INTERVIEW WITH ADNAN'S BROTHER, ALI

Stephanie Hussain Juwan

These are the questions asked and answered during the interview:

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

Faci

Lorrie Nelson

Part 1 of 2

Memo to Cristina Gutierrez re: Interview
with Adnan Syed with handwritten
account by Adnan Syed regarding
January 13, 1999 (August 25, 1999)
(from defense file, A-0153-54)

A clearer copy of Adnan Syed's handwritten account is available here

<https://www.adnansyedwiki.com/wp-content/uploads/2018/06/UdE01-Adnan-his-handwritten-notes-for-attorney-19990825.pdf>

MEMORANDUM

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

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

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

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

Information regarding Jay Wilds

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

Information regarding January 13, 1999

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

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

H:/DOCS/DATA/SYED/INTERVIEWADNAN.DOC

* 1-13-99 - arrived at school 7:45

* 1st pd. 7:50 - 9:15 - Photo 1:1 s. Margaret Musa

nothing significant / I remember - don't remember lesson plan

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

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

present - stuffed teddy bear, B-day card

don't remember lesson plan

* Lunch 10:50 - 11:55 - left school, went to Jay's

house don't know what we did, came back

to school 12:40 - left to borrow my car (no phone

in glove compartment)

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

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

in packet of letters for bail hearing)

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

it took some time in the guidance office

Memo to Cristina Gutierrez re:
Interview with Adnan Syed
(January 15, 2000)
(from defense file, A-0234-35)

MEMORANDUM

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

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

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

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

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

DEBORAH WARREN She testified as to a note from October or November where Adnan and Aisha were writing back and forth to one another. Adnan said the part about kill looks like his writing. Aisha and Adnan were in Health class writing this. Health class is about 1-1 1/2 hours long. He cannot remember what they were writing about, but knows it had something with Hae being sick in the morning and the speculation about her being pregnant.

She also stated Adnan was possessive – that he did not want her to be around other guys. Adnan does not know hwy she would say that. He wondered if she could give specific examples of how this was. I guess also why this behavior would be any different from Hae being upset about girls sitting on his lap, etc.

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

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

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JAY WILDS

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

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

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

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

Mcgclicnts/syed/interview4.doc

Memo to Cristina Gutierrez re:
Interview with Adnan Syed
(October 6, 1999)
(from defense file, A-0182-83)

MEMORANDUM

TO: MCG
FROM: KALI
DATE: October 6, 1999
RE: INTERVIEW WITH ADNAN SYED

Wright
get address
school records
Take up

Stephanie
McPherson
Main Falls Grove
Upper Merion
Woodbridge
Valley

On October 6, 1999, I met with Adnan at the Baltimore City Detention Center.

(1) *Discussed whether he spoke with anyone at school, i.e. counselors, teachers, etc., formally regarding the disappearance/death of Hae.* Adnan stated that he spoke generally about the death to the school counselor, but he had not been formally evaluated nor did he have formal discussions.

Adnan stated he spoke with his Social Studies teacher, **Mr. Cliff Thomlin**, regarding what Christians believe happens when someone dies. He discussed this topic with him a few days after Hae's body was found.

request
my notes
of this
interview

Stuckey

He stopped in and spoke with his guidance counselor, **Mrs. Stuckey**, after he and Hae had broken up in December. She told him breaking up is a part of growing up and that eventually you find the person whom you were destined to meet. When Hae's body was found, the detectives came to school and Adnan found out they wanted to meet with him. Adnan did not want to meet at his home, due to concerns surrounding his parents. Mrs. Stuckey suggested to Adnan the detectives interview Adnan at school. Mrs. Stuckey asked the principal, Mr. Wilson, if Adnan could meet the detectives at the school. Mr. Wilson authorized the interview to take place on school grounds, and both Mrs. Stuckey and Mr. Wilson stated they would be present to assist Adnan when he met with the detectives because Adnan needed someone over 18 years old to be present. Mrs. Stuckey informed Adnan that one should always be careful when talking to police detectives. The interview never took place.

(2) *Adnan wanted to know if we found any connection between Jay and Alonzo Sellers.*

assembly or
choice for
some
people to
leave
January
assembly at
half day

Adnan asked if we found any connection between Jay and Hae. He stated that in January after he and Hae had broken up, Adnan told Hae that Jay had cheated on Stephanie. Jay told Adnan he planned to have a girl at his house during the time the students at Woodlawn would be participating in an assembly (in January). Adnan saw Stephanie on the way to the assembly. Stephanie told Adnan she was going to Jay's house. Adnan convinced Stephanie not to go to his Jay's house and to attend the assembly. Hae was really upset that Jay was cheating on Stephanie and stated that the next time she saw Jay she planned on confronting him. Adnan questions whether upon Jay's return to school to return the car to Adnan he saw Hae in the parking lot who would have been leaving at 3 p.m.

who
Hae b/c Jay was
supposed to be
with her so why
would he come
to Jay's house?
Why would he
have come?
Jay, Refs

(3) **EMT CLASSES** He attended the class through May Ambulance - which was next to Woodlawn High School and is now closed. He attended at age 16, June - September 1997. The class met two times during the week for 3 hours each session, and every other Saturday. He participated in the EMT Basic training which required 125 hours of training versus the EMT Paramedic class which

work do tech
attend patient in
ambulance to
make sure vital signs
stable
What did he do?
make sure oxygen flowing
replace canisters
check vital signs
talk to patient in fa
assist in a
dialysis machine
try to
App-236
get records

has been on the
for a while
in Memphis
if she
was

A - 0183

required 1000+ hours. He learned lifesaving skills and learned about the respiratory, circulatory and nervous systems. He said every person generally knows how to stop someone from breathing. He was appalled that the ASA would imply that taking an EMT class makes one well versed in methods of murder. He took the EMT class because his employment required him to do so, not for the heck of it. He was employed at RURAL METRO AMBULANCE October 1998-Feb 1999.

(4) **DIARIES** He knows that Hae kept a diary and she often teased him about it. She would leave the diary unattended in Adnan's presence and often ask Adnan if he had looked at it. Adnan stated he never looked at the diary because the diary was her personal property. She kept the diary in her car a lot. Adnan told the detectives that Hae kept a diary and asked the detectives if they found it because that may be helpful as to what she planned for that day. The detectives informed Adnan they had the diary already.

(5) **NEW CELL PHONE NUMBER** Adnan called Hae at her home the night before she was missing. Adnan was calling at 11 p.m. from the Rite Aid. She was on the other line when he called. He always discussed his desire for a cell phone with Hae and asked that she guess from where he was calling. She initially guessed a pay phone and then guessed that he had gotten a cell phone. She was excited according to Adnan. He gave Hae his new cell phone number. Hae told him that she'll call him on his cell phone later and Adnan told her not to because he was going home and going to bed. He doesn't think Hae ever called him on his cell phone.

(6) **Relationship with Hae following breakup** Adnan describes their relationship as friends, "good friends". He gave Hae a picture frame that said "Best Friends" and had their picture in it for Christmas. He said there was no animosity between them and they talked practically everyday. There was occasional light flirting, but no sexual relationship.

(7) **Attorney Anne Benroya** Adnan did not know the attorney who represents Jay. He also did not recognize any names on the list from the district court/ Towson computer, with the exception of "OSMAN SHARIF". Adnan knows an Omar and Atif Sharif. They are brothers, but no Osman.

H:\DOCS\DATA\SYED\INTERVIEW\ADNAN2.DOC

Hae's #.
410
602
5294
n Jan. 12th
we called
her at
home.
11-12 p.m.
called
from the
bid on
corner of
Indaleide &
Rite 40
across from
Westview
Mall.

pull
cell
phone
records
+ 1.D.

Same
picture
as the
one on
his
brother's
car?

ML
As a letter request

Did Jay have
people in Rockville

don't know.
has friends near
Frederick, MD.
blk # on his cell
phone called #
day to
Frederick

like what
friendly wouldn't even call
it "flirting" nothing suggestive
just casual conversation - bottom
51stly.
defines flirting "dealing with
physical verbal or
would exceed normal
boundaries"
etc. put arms around you;
staring smiling.

Memo to Cristina Gutierrez re:
Interview with Adnan Syed
(October 12, 1999)
(from defense file, A-0189-92)

Adnan

MEMORANDUM

TO: MCG
FROM: KALI *(initials)*
DATE: October 12, 1999
RE: INTERVIEW WITH ADNAN SYED

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

III. Adnan reviewed the diary. See Notations Attached.

g:\docs\data\Syed:interview.adnan.diary.doc

Memo to Cristina Gutierrez re:
Track Team Roster with handwritten
notes from Cristina Gutierrez
(October 16, 1999)
(from defense file, A-0195-202)

Track Team:

MEMORANDUM

TO: MCG
FROM: KALI
DATE: October 16, 1999
RE: Track Team Roster

*Are there
who
on*

Boy Indoor Track Team - Woodlawn High School

Kehinde Adedoye (Sr.) *lots of classes by*

Joel Brown (Sr.)

Michael Clites

^A
Clevon Johnson →

Anthony Jenkins

William McCray — *W. McCray*
plays football

Aaron Noreiga

Dorrell Walker

*friends w/ of
football team
friends*

*used to play
play football
hang out at track meets*

*4x2 Relay
just play*

g:\docs\data\syed\track.doc

Track Team:

MEMORANDUM

TO: MCG
FROM: KALI
DATE: October 16, 1999
RE: Track Team Roster

Boy Indoor Track Team - Woodlawn High School

- Kehinde Adeloeye (Sr.) *lots of classes by*
- Joel Brown (Sr.)
- Michael Clites
- ^A Clevon Johnson →
- Anthony Jenkins
- William McCray → *Wice plays football*
- Aaron Noreiga
- Dorrell Walker

Friends w/ of football team friends.

Woodlawn
Mark Pryor 1801
plays hard
for Mally
meets

Coach
Gerald Russell
4x2 Relay
1st
2nd
3rd
4th

g:\docs\data\syed\track.doc

K
MEMORANDUM

TO: MCG
FROM: KALI
DATE: October 16, 1999
RE: Track Team Roster

CC: Mike Lewis

Drew called and provided the telephone numbers of the members of the track team.

Boy Indoor Track Team - Woodlawn High School

Kehinde Adeloje (Sr.) 410-298-7459
Joel Brown (Sr.) 410-944-2278
Michael Clites 410-747-5578
Clevon Johnson 410-521-5393
Anthony Jenkins 410-298-4960
William McCray 410-744-4047
Aaron Noreiga 410-747-9513
Dorrell Walker no home phone (mom's work) #410-679-0776

Mike- Drew also stated he will attempt to personally serve everyone, but knows that you recommended subpoenas, and that he thinks it's a good idea. He said for you to put a copy of every subpoena in the mail to him. He said you will understand what this means.

MEMORANDUM

TO: MCG
FROM: KALI
DATE: October 16, 1999
RE: Track Team Roster

CC: Mike Lewis

Drew called and provided the telephone numbers of the members of the track team.

Boy Indoor Track Team - Woodlawn High School

Kehinde Adeyoye (Sr.) 410-298-7459 - *left message on answering machine, then did not
return call + said so was away at college.*

* Joel Brown (Sr.) 410-944-2278 - *# has been disconnected - no further info*

Michael Clites 410-747-5578 - *spoke with mother & gave her message not to appear*

* Clevon Johnson 410-521-5393 - *# temporarily disconnected*

Anthony Jenkins 410-298-4960 - *left message with mother Jenkins (he did not return)
Subpoena yet*

William McCray 410-744-4047 - *left message with him.*

Aaron Noreiga 410-747-9513 - *left message with his Mom.*


Dorrell Walker no home phone (mom's work) #410-679-0776 - *called his house - 869-7346,
spoke with him & gave him the message.*

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

Mike-Drew also stated he will attempt to personally serve everyone, but knows that you recommended subpoenas, and that he thinks it's a good idea. He said for you to put a copy of every subpoena in the mail to him. He said you will understand what this means.

g:\docs\data\syed\track2.doc

MEMORANDUM

TO: MCG 
 FROM: KALI
 DATE: October 16, 1999
 RE: Track Team Roster

CC: Mike Lewis

Drew called and provided the telephone numbers of the members of the track team.

Boy Indoor Track Team - Woodlawn High School

Kehinde Adeboye (Sr.)	410-298-7459
Joel Brown (Sr.)	410-944-2278
Michael Clites	410-747-5578
Clevon Johnson	410-521-5393
Anthony Jenkins	410-298-4960
William McCray	410-744-4047
Aaron Noreiga	410-747-9513
Dorrell Walker	no home phone (mom's work) #410-679-0776

Mike- Drew also stated he will attempt to personally serve everyone, but knows that you recommended subpoenas, and that he thinks it's a good idea. He said for you to put a copy of every subpoena in the mail to him. He said you will understand what this means.

MEMORANDUM

TO: MCG
 FROM: KALI
 DATE: October 16, 1999
 RE: Track Team Roster
 CC: Mike Lewis

Drew called and provided the telephone numbers of the members of the track team.

Boy Indoor Track Team - Woodlawn High School

Kehinde Adeloje (Sr.) 410-298-7459
 Joel Brown (Sr.) 410-944-2278 - *disconnected*
 Michael Clites 410-747-5578 - *left message*
 Clevon Johnson 410-521-5393
 Anthony Jenkins 410-298-4960 - *contacted*
 William McCray 410-744-4047
 Aaron Noreiga 410-747-9513
 Dorrell Walker no home phone (mom's work) #410-679-0776

Mike- Drew also stated he will attempt to personally serve everyone, but knows that you recommended subpoenas, and that he thinks it's a good idea. He said for you to put a copy of every subpoena in the mail to him. He said you will understand what this means.

F

MEMORANDUM

TO: MCG
FROM: KALI
DATE: October 16, 1999
RE: Track Team Roster

CC: Mike Lewis

Drew called and provided the telephone numbers of the members of the track team.

Boy Indoor Track Team - Woodlawn High School

Kehinde Adeloje (Sr.)	410-298-7459	
Joel Brown (Sr.)	410-944-2278	
Michael Clites	410-747-5578	- served
Clevon Johnson	410-521-5393	-
Anthony Jenkins	410-298-4960	
William McCray	410-744-4047	-
Aaron Noreiga	410-747-9513	- served
Dorrell Walker	no home phone (mom's work) #410-679-0776	- served

Mike- Drew also stated he will attempt to personally serve everyone, but knows that you recommended subpoenas, and that he thinks it's a good idea. He said for you to put a copy of every subpoena in the mail to him. He said you will understand what this means.

MEMORANDUM

TO: MCG
FROM: KALI
DATE: October 16, 1999
RE: Track Team Roster

CC: Mike Lewis

Drew called and provided the telephone numbers of the members of the track team.

Boy Indoor Track Team - Woodlawn High School

✓ Kehinde Adelooye (Sr.) 410-298-7459
M.H. Joel Brown (Sr.) 410-944-2278
N.H. Michael Clites 410-747-5578 - served
Clevon Johnson 410-521-5393 - disconnected #
✓ Anthony Jenkins 410-298-4960
✓ William McCray 410-744-4047
N.H. Aaron Noreiga 410-747-9513 - served
Dorrell Walker no home phone (mom's work) #410-679-0776 - served
not employed there -
COVERED

Mike- Drew also stated he will attempt to personally serve everyone, but knows that you recommended subpoenas, and that he thinks it's a good idea. He said for you to put a copy of every subpoena in the mail to him. He said you will understand what this means.

Memo to Cristina Gutierrez re: Adnan Syed (February 28, 2000) (from defense file, A-0241)

Memorandum

TO: MCG

FR: RP

RE: Adnan Syed

DA: 2/28/00

1. Adnan called to see if you can ask the judge to refer him to Patuxent. (remember that Patuxent is really not taking lifers. Maybe if the judge suspends part of the sentence they will, but they even say they don't want people with long sentences.) Also, will you see him before sentencing? Also at this point he wants to have you handle the appeal but I told him you will discuss everything with him.

2. Rabia Chaudry, Saad's sister, called b/c the family would like to meet with you asap re the MFNT and sentencing, etc., and what happens next. They asked to see you Thursday or Friday, but I said those days don't look good and suggested today or tomorrow. She asks if you are available tomorrow at 9 or 10 a.m. – she is in Virginia and needs a bit of notice, and they need to do it in the morning. Her number is 703-578-3326. The family wants her there b/c she can help interpret.

Internal Defense Notes with
Task List and handwritten notes
of Cristina Gutierrez
(from defense file, A-0261-66)

Date: 09.04.99
Re: ADNAN SYED, 5540.1402
TTD

Attorney/Client Privilege &
Material Work Product
Privileged Material

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

\\NW2\SYS\docs\DATA\Syed\ToDo.doc_5540.1402

Date: 09.04.99
Re: ADNAN SYED, 5540.1402
TTD

Attorney/Client Privilege &
Material Work Product
Privileged Material

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

\\NW2\SYS\docs\DATA\Syed\ToDo.doc.5540.1402

Date: 09.04.99
Re: ADNAN SYED, 5540.1402
TTD

Attorney/Client Privilege &
Material Work Product
Privileged Material

TASK	PERSON(S) ASSIGNED	NOTES
Ex Parte		
SDT Lencrafters, Hae's employment records and time sheets SDT for trial, Tangible Evidence, Ex Parte		Hae's personnel file Donald Clindinst's personnel file time sheets for 12/01/98 - 02/28/99 GM: Carlyn Tamm (Tamm Store) 325 Sulem Valley Rd. Suite 32 Tamm, MD 21287 410-825-5343 Serial SDT 90 5402
SDT Woodlawn H.S. and Balto Co. Board of Education Records on: Hae Adnan Jay Stephanie class schedule, attendance record teachers assigned to all senior classes SDT for trial, Tangible Evidence, Ex Parte		Serial subpoenas to Woodlawn H.S. Attn: Ms. Lisha Evans 1801 Woodlawn Dr. Baltimore, MD 21207 410-887-1319 9.24
SDT Donald Clindinst criminal record, school records SDT for trial, Tangible Evidence, Ex Parte	ML Hartford Co.	
SDT Baltimore Co. Police Dept any prior complaints to Lee's address SDT for trial, Tangible Evidence, Ex Parte	ML	
SDT Alonzo Sellers criminal record, all police reports of any prior arrests or interactions w/ police SDT for trial, Tangible Evidence, Ex Parte	ML	

Date: 09.04.99
Re: ADNAN SYED, 5540.1402
TTD

Attorney/Client Privilege &
Material Work Product
Privileged Material

TASK	PERSON(S) ASSIGNED	NOTES
SDT Pet World Smart employment records of Jay Wilds, time sheets, personnel file	Drew Kali	Pet Smart - 7721 Rutaski Hwy (Rt. 46) Soul SDT: Pet Smart Attn: Payroll Dept 11600 N. 27th Ave. Phoenix, AZ 85027
SDT Porno Store *** need name employment records of Jay Wilds SDT for trial, Tangible Evidence, Ex Parte	Drew Kali	
SDT Jay Wilds prior record *** -- Balto City and Balto County all police record, MVA records SDT for trial, Tangible Evidence, Ex Parte	Drew Kali	
Make request to view the physical evidence w/ Adnan	MCG ML	State answered w/ no "showings" response
Make determination regarding alibi	MCG and ML	Let f Student new school after " " Perf at Morgan " " " at Truist Practice
Computer • develop powerpoint demo • computer diagrams/photos	ML	
MAPS		
Woodlawn High School	Kali Drew	
Woodlawn High School Track practice	Kali Drew	

urgent

Date: 09.04.99
 Re: ADNAN SYED, 5540.1402
 TTD

Attorney/Client Privilege &
 Material Work Product
 Privileged Material

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

Date: 09.04.99
 Re: ADNAN SYED, 5540.1402
 TTD

Attorney/Client Privilege &
 Material Work Product
 Privileged Material

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

Internal Defense notes of
Cristina Gutierrez re: “How
did Adnan get in Hae’s Car”
(from defense file, A-0775)

How did Adnan get in
Hae's car

Debbie Warren
saw Hae at 3:00 pm

Hae recognizes Adnan's car

even if Jay was
driving

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

Jay = I couldn't bury her.

There are 2 TAPES

Jay admits to Drug Trafficking
& Distribution

Who Prepped

Internal Defense Notes (7/13/1999) (from defense file)

Debbie Warren work w/ Alana to put Hae's school
assembly together

7/13

E-mail → syed ^{password} - adnan @ hotmail.com poppy

1/14 - 1/15 snow days

Asia McLean → saw him in the library @ 3:00
→ Asia boyfriend saw him too

Library may
have cameras

Track starts @ 3:30

school start @ 7:30 ^{bell ring} 7:45 school start

Ms. M. Muse 1st Pd. Photography 7:50 - 9:15 take role

Ms. Jane Efrom → English AP English / Social Studies 9:20 - 10:45

Mr. Cliff Tomlin → Soc. on the 1/13

Lunch 10:50 - 11:15 on prem. see lunch
left school w/ friends

went to Jays house

Free Period 11:20 - 12:45 stayed @ Jays house

Counseling Office 1/13
Ms. Donna Paolotti → AP Psychology 12:50 - 2:15

school end 2:15

Internal Defense Notes
stating “Asia + boyfriend saw
him in library 2:15-3:15”
(from defense file)

Stephanie like me & his boys

Jay - If anyone ever tried to
get between her & I
I'd kill her

Stephanie didn't like Hae at all

Friends of
his then
Stephanie
- when they
wanted to 'break up'
Can police get for him

Aria + boy friend

(saw him in February)

Went to Library after 2:15 - 3:15
3:30 Practice started

Memorial service

Detective Interview Notes
of Debbie Warren
(February 14, 1999) (B-00006)

BALTIMORE COUNTY POLICE DEPARTMENT

CONFIDENTIAL

REPORT OF INVESTIGATION

NAME OF SUBJECT WARREN, DEBBIE	DATE SUBMITTED 02/14/99 TYPE OF INVESTIGATION LEE MISSING PERSON 99-013-1074
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NOTICE: THE INFORMATION CONTAINED IN THIS REPORT IS HIGHLY CONFIDENTIAL. DISSEMINATION OF INFORMATION TO ANY PERSON WITHOUT A NEED TO KNOW IS STRICTLY FORBIDDEN.

REPORT OF FINDINGS:

INTERVIEWED: WARREN, DEBBIE
BLACK FEMALE, DOB [REDACTED]
[REDACTED]
BALTIMORE, MD 21228
TELEPHONE [REDACTED]

RELATION: SCHOOLMATE AND FRIEND OF HAE LEE

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

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

SIGNATURE OF INVESTIGATOR <i>Det. J. O'Shea #2828</i>	NAME OF INVESTIGATOR Detective J. O'Shea #2828
Page 1	
MPIA 15 459 817	

Detective Interview Notes
of Inez Butler
(March 23, 1999) (B-0191, B-0193)

3/23/99

1:20 - 2:03 INEZ BUTLER
GYM TEACHER

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

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

SAW ▲ IN BUILDING EARLIER THAT DAY.

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

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

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

REMEMBER WHAT SHE HAD ON

BECAUSE HER SKIRT WAS SHORT

SHE PUT \$ IN CASH BOX HERSELF.

TEACH PSAT/ SAT -- HOW TO TAKE THE TEST

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

**DON'T REMEMBER SEEING THEM AT LUNCH

USUALLY SAME GROUP THERE

HAE KNEW I HAD TO LEAVE AT 2:45

BELL RINGS 2:15. SHE GOES GETS CAR

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

SHE'S UP IN FRONT OF THE SCHOOL.

HAE KEEPS CAR RUNNING. KEYS IN CAR

RUNS BEHIND COUNTER

VERY FINE APPLE JUICE / HOT FRIES

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

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

(DID WE FIND A JUICE

BOTTLE OR FRY BAG

IN CAR PER SGT. LEHMAN) ?

MY CHILD'S BELL RINGS AT 2:45

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

COULDN'T BE CLOSER TO 2:15 BECAUSE:

2:25 BUSES LEAVE

2:30 SHE JUMPS FROM CAR

SHE DIDN'T WANT TO WAIT WITH OTHERS

SO SHE JUST RAN BEHIND COUNTER

ALICE SAID HAE IS LATE COMING BACK TODAY.

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

"DO YOU STILL RUN TRACK?"

Detective Interview Notes
of Virginia Madison
(March 24, 1999) (B-0247-48)

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

3/24/99

VIRGINIA MADISON
ASST. TO LIBRARIAN

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

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

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

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

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

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

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

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

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

→ NEED SHEETS FROM SEPT. → NOV.

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

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

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

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

NO PASSWORD NEEDED TO GET INTO COMPUTER

NO STUDENT DISC PER EACH STUDENT IN LIBRARY

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

Detective Interview Notes of Cheryl Metzger (March 24, 1999) (B-0251)

3/24/99

CHERYL METZGER

LOOKED ON HARD DRIVE
FOUND HAMLET ESSAY ON COMPUTER

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

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

STUDENTS DON'T NEED A PASS DURING LUNCH

REGULARS ARE:

▲ WAS A REGULAR
NEVER PAID ATTENTION TO WHO HE SAT WITH
IMRAN AHMED WOULD SIT WITNESS HIM

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

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

HE WAS DOING SOMETHING ON COMPUTER.

ALWAYS FRIENDLY
QUIET, RESPECTFUL

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

Detective Interview Notes
of Ja'uan Gordon
(April 9, 1999) (B-0101, 0129-33)

B - 0101



CIB - HOMICIDE
POLICE DEPARTMENT
BALTIMORE, MARYLAND
Progress Report

TO: Commanding Officer
Homicide Unit

FROM: Detective Greg Macgillivray
& Carew

SUBJECT: Progress Report
Homicide Investigation

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

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

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

Lee, Hae Min [REDACTED] A / F 18	

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

On Friday, 9 April 1999, Assistant States Attorney, Ms. Vickie Wash along with this investigator responded to Woodlawn Senior High School in furtherance of the above captioned investigation. While at the school the following students were interviewed; Rebecca Walker, Peter Billingsley, Nina Philipsen and Ja'uan Gordon. For information gathered during those interviews, see section F of this file.

The investigation continued with Ms. Wash and this investigator responding to the residence of Nisha Tanna, located [REDACTED] in Silver Spring, Maryland. Your investigator agreed to meet with the witness at her residence because of her reluctance to travel to Baltimore.

During the interview, Ms. Tanna was very cooperative and helpful in providing background information about her friendship with suspect, Adnan Syed. She also provided your investigators with information about the call placed to her residence on Wednesday, 13 January 1999 from the suspect's cellular phone. For additional information obtained during that interview, see section F of this file.

Respectfully,

Detective William F. Ritz

REGISTERED WITH ME LIKE 2 WEEKS LATER THAT SHE HADN'T COME BACK YET.

THOUGHT SHE WAS ON VACATION.

CAME TO CLASS ONE DAY 2ND PERIOD - HEARD PEOPLE SAY SHE WAS MISSING

LAST YEAR SOME TIME THEY BECAME BF/GF BEFORE PROM

THEY BROKE UP DECEMBER:

THINGS WEREN'T WORKING OUT

SHE SAID SHE LIKED SOMEONE ELSE

▲ AND I TALKED ABOUT IT

HE WAS SHOCKED , SHE SAID SHE LOVED HIM, BUT HOW COULD HER FEELINGS CHANGE SO FAST BECAUSE SHE LIKED SOMEONE ELSE.

DID NOT KNOW REASON FOR 2ND BREAK-UP

SHE WROTE ▲ A LETTER - SHE DON'T LOVE HIM ANYMORE

▲ WAS MAD

SCHOOL TRIP THAT DAY--

B - 0130

CAME BACK AFTER SCHOOL

MEET CANCELED

EYES WATERY, HE WAS FLUSHED, NEVER SAW HIM CARE

ABOUT ANYONE LIKE THAT BEFORE, NEVER SEEN HIM

LIKE THAT BEFORE

DIDN'T TALK ABOUT SEXUAL RELATIONSHIP WITH ▲

NEVER SAW ▲ DRINK

JA'UAN DRINKS --

SMOKED MARIJUANA BEFORE WITH ADNAN 1X

REMINISCING ABOUT SPOT BY BEST BUYS

HE SAID -- IT WASN'T MUCH (AMOUNT OF MARIJUANA)

HE SNEEZED AND IT BLEW.

HAD A FASHION SHOW PRACTICE AFTER SCHOOL

WENT TO HIS HOUSE; I STAYED IN HIS CAR - ACCORD - BROWN

OR GOLD

CAME BACK BEFORE PRACTICE

WOULD HAVE BEEN AFTER CHRISTMAS AFTER SHE WAS GONE

▲ HAD TO PICK UP A LIGHTER

B - 0131

BOTH OF OUR CARS HAD ELECTRICAL PROBLEMS

GO TO BEST BUYS BY McDONALD'S ACROSS FROM SECURITY
PULL IN BACK.

GO TO END PARKING LOT CLOSEST TO BELTWAY

JOINT-NOT MUCH, ROLLED IT RIGHT THERE

HE DID IT, I DON'T' ROLL. HE HAD THE PAPERS

MARIJUANA WAS JA'UAN'S

TALKED ABOUT IT NOT BEING ANY GOOD

★ HE SAID - I USED TO COME HERE WITH HAE

WHERE IT WAS AT, DIDN'T KNOW IT WAS OVER THERE

1ST MISSING --- HE SAID HE HOPED SHE RAN OFF WITH HER BOY-

FRIEND CAUSE HE DIDN'T WANT TO FIND OUT THAT

SOMETHING HAPPENED TO HER

NEVER GOTTEN HIGH ON OTHER OCCASIONS

WENT TO MALL BEFORE -- SECURITY SQUARE MALL

HE CAME TO MY HOUSE COUPLE TIMES IN SUMMER

HAS CELL PHONE/ PAGER

FOUND OUT THAT MORNING ---

▲ IN NURSE'S OFFICE

B - 0132

WENT TO GO SEE HIM.
 FIRST HE WAS IN DENIAL
 THEN AT NURSE'S OFFICE HE BROKE DOWN
 BUT I WASN'T IN THERE
 NOT SURE IF ▲ HAD A LOCKER.
 I SHARE WITH SOMEONE ELSE.
 WE LEFT THE SCHOOL. WENT TO PETER'S HOUSE. ME, PETER,
 IMRON H., ADNAN
 NO WEED OR ALCOHOL
 PARENTS NOT HOME
 ▲ WENT DOWNSTAIRS BY HIMSELF, BUT WAS
 CRYING IN CORNER.
 THOUGHT HE NEEDED TO BE BY HIMSELF
 PEOPLE CAME TO HOUSE
 HE SAID HE PROBABLY WOULDN'T HAVE BROKEN DOWN IF
 NOT FOR THE NURSE. SHE SHOOK HIM MADE HIM REALIZE IT
 WAS HER.
 ME, MAC, PETER, DERRICK, JEIVAUGHN?

B - 0133

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

101 EAST EAGER STREET

ASIA? 12TH GRADE

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

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

BAGELS, CHOCOLATE MILK, DONUTS

SHE PICKED BOTH OF US UP FOR SCHOOL

▲ DIDN'T HAVE CAR --

PARKING LOT:

▲ DIDN'T MENTION ANY OTHER PLACES THEY WENT.

Baltimore Police Department
Information Sheet re Ja'uan Gordon
(April 20, 1999) (B-0293-95)

TAPED

Police Department
Baltimore, Maryland

CI/209

Case Number H99030

INFORMATION SHEET

Name JA'UAN GORDON Nickname JAY

Race B Sex M Age 18 D.O.B. [REDACTED]

Height 5-08 Weight 185 Complexion LIGHT

Address [REDACTED] SS# [REDACTED]

Home Phone [REDACTED] Date and time of interview 4-20-99 1250

Parent's name [REDACTED] Address SAME

Boy/girlfriends name [REDACTED] Address [REDACTED]

Last School Attended WOODLAWN HIGH SCHOOL Grade 12

Employer ECONOMY SHOES Address WESTVIEW

Employers Phone 410-747-4650 Hours of employment [REDACTED]

RELATIVES IN BALTIMORE NOT LIVING WITH WITNESS

Name [REDACTED] Relationship [REDACTED]

Address [REDACTED] Phone [REDACTED]

Name [REDACTED] Relationship [REDACTED]

Address [REDACTED] Phone [REDACTED]

Read and Write Yes X No [REDACTED]

Under the influence of drugs Yes [REDACTED] No X

If yes explain [REDACTED]

Alcohol Check One Sober X Had Been Drinking [REDACTED] Intoxicated [REDACTED]

Description of clothing at time of Interview (note in bloodstained torn etc.) MULTI-COLORED RUGBY SHIRT, BLUE JEANS, BLACK TENNIS

Note any injuries [REDACTED]

Meals Provided [REDACTED] Date [REDACTED] Time [REDACTED] Date [REDACTED] Time [REDACTED]

Detective MACGILLIVARY Detective RITZ

MPIA 15 459 468

INTERVIEW @ Woodlawn @ 4/20/99
 HIGH - JA'UN Gordon @ 1251

1ST ENGLISH
 - SS
 HEAVY

2ND - ENGLISH / SS
 PHOTOGRAPHY

3RD ENGLISH / SS - 2ND
 1ST FOODS 745 - 915

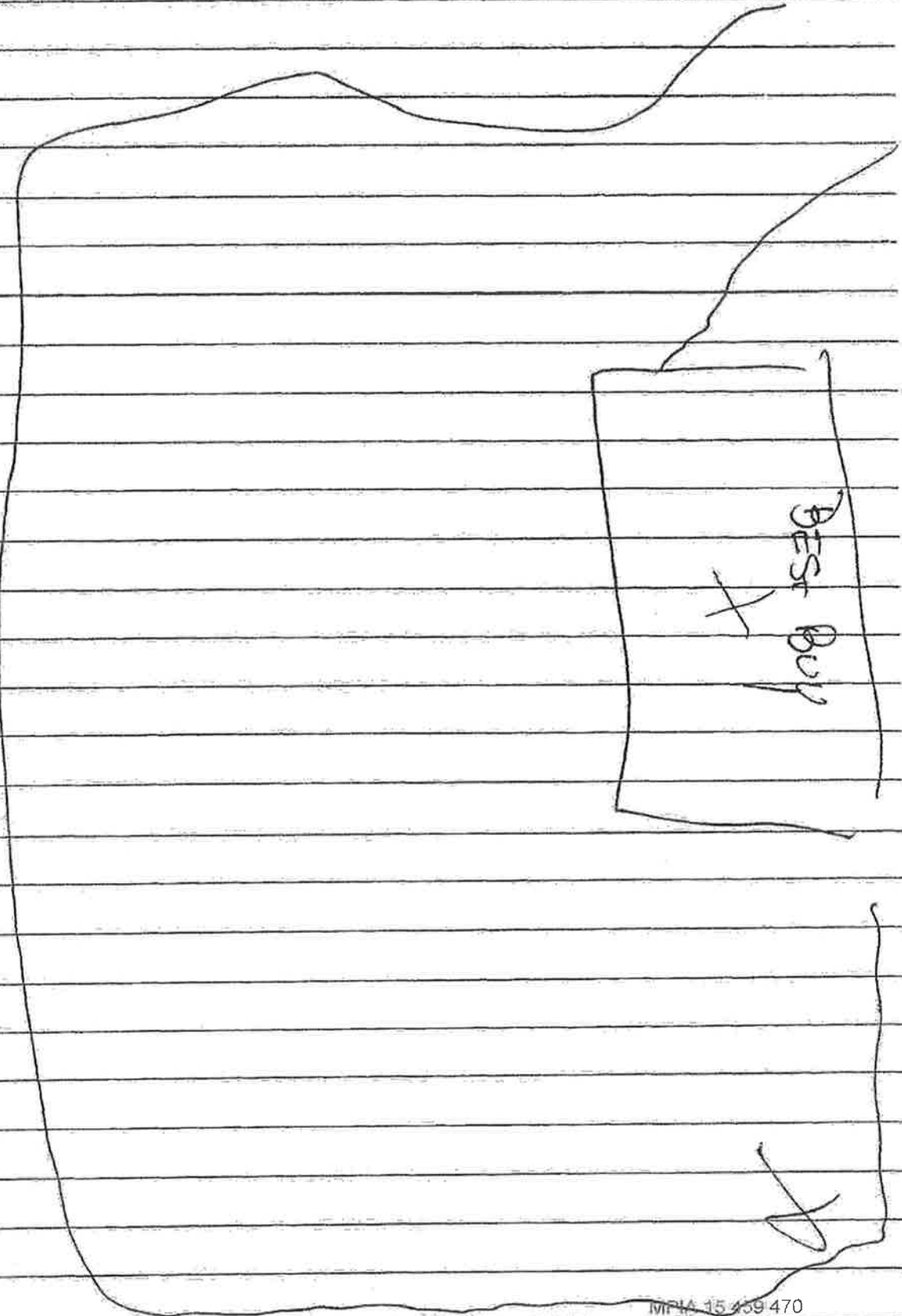
FASHION SHOW PRACTICE - BEST BUY

MS. GRAMM - FASHION SHOP

JA'UAN

(C)

(P) 410



MPIA 15 459 470

Sworn Affidavit by Ja'uan
Gordon for Post-Conviction
Hearing
(February 7, 2016)

Affidavit



- 1 My name is Javan Gordon. I was in contact with Aonnan Syed the months following his arrest.
- 2 I am aware that Aonnan tried to get character letters to be used during his case. He sent me a letter asking me to draft a character letter on his behalf after his arrest.
- 3 I am aware that he reached out to others asking that they write character letters on his behalf as well.
- 4 In my interview with police on 7/9/99 I was not suggesting that Aonnan or anyone else did anything deceptive. I recall telling police that Aonnan talked about asking Asia to write a character letter. He may have asked her by letter (just like he did with me and Justin). I do not know if he ever sent her the letter, nor do I know if she ever received it.
- 5 I have no knowledge of Aonnan asking Asia to write anything fraudulent, or with intentions of misrepresenting anything to the court. I was not in any way suggesting that ~~to the police~~ in my interview with police.

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

February 7, 2016 5:05pm
DATE / TIME

JAVAN GORDON

Defendant's Alibi Notice (10/4/1999)

REDMOND & GUTIERREZ, P.A.

ATTORNEYS AT LAW

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LEONARD C. REDMOND, III

HAROLD L. BURGIN*

JOSEPH L. TIVVIS, JR.

BAMBI GLENN

RITA PAZNOKAS

* ALSO ADMITTED IN THE DISTRICT OF COLUMBIA

PRINCE GEORGE'S COUNTY OFFICE

14746 MAIN STREET

UPPER MARLBORO, MARYLAND 20772

(301) 952-1555

M. CRISTINA GUTIERREZ

October 4, 1999

VIA HAND-DELIVERY

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

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

Dear Mr. Urick:

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

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

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Mohammed Alikhan, 17 East Cross Street, Baltimore, MD 21230
 Ammar Al-Badarneh, 2204 Riding Crop Way, Baltimore, MD 21244
 Summer Atiya Al-Badarneh, 2204 Riding Crop Way, Baltimore, MD 21244
 Amtul Bashir, 40 Pacton Place, Baltimore, MD 21244
 Bilal Ahmed, 40 Pacton Place, Baltimore, MD 21244
 Anwarul H. Chaudry, 1228 Pleasant Valley Drive, Baltimore, MD 21228
 Khalida A.K. Chaudry, 1228 Pleasant Valley Drive, Baltimore, MD 21228
 Arian A. Waseem, 11010 Nacrima Court, Stevenson, MD 21153
 Malika Firdous Waseem, 11010 Nacrima Court, Stevenson, MD 21153
 Badr E Oweis, M.D., 612 Edmondson Avenue, Baltimore, MD 21228
 Cilia Kader Ndiaye, 2 Craven Court, Baltimore, MD 21244
 Abu Bakar Ndiaye, 2 Craven Court, Baltimore, MD 21244
 Farooq A Marfani, 4 Lenis Court, Baltimore, MD 21244
 Rabia Marfani, 4 Lenis Court, Baltimore, MD 21244
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 Rafia Chaudhry, 2071 Park Trail Road, Baltimore, MD 21244
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 Shahza Patel, 9 Randolph Spring Court, Baltimore, MD 21228
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 Masood Ali Khan, 6627 Johnnycake Road, Baltimore, MD 21244
 Mazhar A Baig, 2026 Cross Trails Road, Baltimore, MD 21244
 Surraiya Ahmed Baig, 2026 Cross Trails Road, Baltimore, MD 21244
 Mohammed Aslam Khan, 1027 Cummings Avenue, Baltimore, MD 21228
 Mohammed N. Khartak, 1420 Harberson Road, Baltimore, MD 21228
 Sameena Khartak, 1420 Harberson Road, Baltimore, MD 21228
 Mohamed Amjad Mian, 4414 Wynfield Drive, Owings Mills, MD 21117
 Nargis Amjad Mian, 4414 Wynfield Drive, Owings Mills, MD 21117
 Mohammed Ijaz Mufti, 1711 Chesterton Road, Baltimore, MD 21228
 Farhana Mufti, 1711 Chesterton Road, Baltimore, MD 21228
 Kashif Munir, 2401 Battersea Place, Baltimore, MD 21244
 Sadia Munir, 2401 Battersea Place, Baltimore, MD 21244
 Mohammed Mustafa Qalawee, 2517 Sarrington Circle, Baltimore, MD 21244
 Leslie M. Qalawee, 2517 Sarrington Circle, Baltimore, MD 21244
 Muhammed Tufail Chaudhry, 2071 Park Trail Road, Baltimore, MD 21244
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 Ossama Abdou, , Baltimore, MD
 Laila Abdou, , Baltimore, MD
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 Gloria O. Cason, 4234 Mary Ridge Drive, Randallstown, MD 21133
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 Lisa Cason, 5511 Stonington Avenue, Baltimore, MD 21207
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 Syed Zahid Husain, 4 Mc Lendon Court, Baltimore, MD 21244
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 Aida T. Ideis, P.D., P.O. Box 653, Ellicott City, MD 21041
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 Michael Clites, 1801 Woodlawn Dr., Baltimore, MD 21207
 Clevon Johnson, 1801 Woodlawn Dr., Baltimore, MD 21207
 Anthony Jenkins, 1801 Woodlawn Dr., Baltimore, MD 21207
 William McCray, 1801 Woodlawn Dr., Baltimore, MD 21207
 Aaron Noriega, 1801 Woodlawn Dr., Baltimore, MD 21207
 Dorrell Walker, 1801 Woodlawn Dr., Baltimore, MD 21207
 Kehinde Adeboye, Baltimore, MD
 Joel Brown, Baltimore, MD
 Saad Chaudry, 1228 Pleasant Valley Dr., Catonsville, MD 21043

Sincerely,


 M. Cristina Gutierrez
 MCG:ml