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BALTIMORE CITY
CRIMINAL DIVISION

PRINCE GEORGE'S COUNTY OFFICE
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M. CRISTINA GUTIERREZ

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

August 5, 1999

Kevin Urick
Assistant State's Attorney
208 The Clarence Mitchell, Jr. Courthouse
Baltimore, Maryland 21202

Re: State v. Adnan Syed

Mr. Urick:

This letter is concerning the *Amended State's Disclosure* dated August 2, 1999, in the above referenced matter. There were several documents missing / omitted from this package.

1. Included in this disclosure was a transcript of an interview of [REDACTED] S [REDACTED] the person who allegedly found the body of Ms. Lee on February 9, 1999, conducted by Detectives MacGillivray and Ritz on February 18, 1999. The transcript provided does not include pages 39 and 40 of the 43 page interview.
2. The *Amended State's Disclosure* of August 2, 1999 included partial reports from two separate polygraph examinations, administered to [REDACTED] S [REDACTED] on February 18th and 24th. The partial report from the February 24th examination contains a written opinion, but the written opinion of the polygrapher from the February 18th examination was not provided.
3. The State did not include any type of explanation or key to the number and letter system used in the polygraph reports. Without this additional information, the defense is not able to understand or interpret the polygraph results or effectively consult with an expert.
4. As previously requested, the defense would like to review and have copies of all photographs as soon as possible. Please advise as to when we can expect copies and to how soon we may review the photographs.

Based on the *Amended State's Disclosure* dated August 2, 1999, and pursuant to Maryland Rule 4 - 263(h), the defense requests that the following additional materials be provided.

1. The name and address of any witness, suspect, or other individual that was administered a polygraph, voice stress, or any other type of physiological examination in connection with this case.
2. The written results and reports of any such examination.

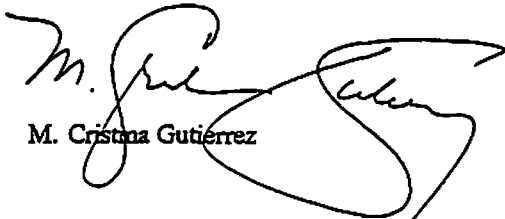
3. The curriculum vitae of any and all individuals administering or associated with polygraph, voice stress, or other physiological examinations.

4. The notes, written or oral, of any polygrapher or individual administering a physiological examination, or any law enforcement personnel, made during the course of the examination, in preparation for the examination, or following the examination.

5. All of the charts generated from the polygraph examinations. If the polygraph examinations were in analog format, copies of the original paper printout. If computer format, a diskette containing the charts.

Please supply the requested materials as soon as possible. As always, we will pick up as soon as we are notified.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Cristina Gutierrez". The signature is fluid and cursive, with a large loop at the end.

M. Cristina Gutierrez

CC: The Honorable William D. Quarles
Circuit Court for Baltimore City
Courthouse East
111 N. Calvert Street
Baltimore, MD 21202

Court File
Office of the Circuit Court Clerk
Criminal Division