



FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2005 NOV 30 P 4: 37

UNITED STATES OF AMERICA
v.
ZACARIAS MOUSSAOUI

UNDER SEAL
CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA
Criminal No. 01-455-A

unsealed per 11/20/05 ruling in open court

DEFENDANT'S NOTICE OF EXPERT EVIDENCE OF MENTAL CONDITION

Pursuant to Rule 12.2(b) and this Court's Order of November 14, 2005, the defendant, Zacarias Moussaoui, by counsel, may present expert testimony from the following mental health experts:

1. Xavier Amador, Ph.D.: Dr. Amador will testify that Mr. Moussaoui suffers from a major thought disorder, most likely paranoid schizophrenia. The basis for that opinion is laid out in detail in Dr. Amador's Evaluation of Competence, Supplemental Report, dated April 20, 2005, previously submitted in this case, which the defendant incorporates by reference into this Notice. His opinion is based on, inter alia, the defendant's conduct in Court and his meeting with Mr. Moussaoui in the holding cell, Mr. Moussaoui's interactions with counsel, the reports of Dr. Patterson, the opinions of Dr. William Stejskal, the defendant's numerous writings and pleadings, the documented history of mental illness in Mr. Moussaoui's family, reports of his behavior from persons who knew him in the United States, and information contained in the Classified discovery in this case, all of which is known to the Government.

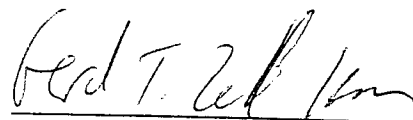
2. Michael B. First, M.D.: Dr. First will testify that Mr. Moussaoui suffers from a major thought disorder. The basis for that opinion will parallel that described for Dr. Amador.

3. Nancy C. Andreasen, M.D., Ph.D.: Dr. Andreasen will testify that Mr. Moussaoui suffers from a major thought disorder. The basis for that opinion will parallel that described for Dr. Amador.

4. Paul Martin, Ph.D.: Dr. Martin will not offer his own diagnosis of Mr. Moussaoui, but the defendant provides this summary in an abundance of caution. Dr. Martin will testify that, based upon, *inter alia*, (1) his unstable and abusive childhood, his exposure to racism as the child of North African immigrants, his social alienation, his mental instability, his lack of a religious identity growing up in France, and (2) the subsequent exacerbation of his alienation in London, Mr. Moussaoui was vulnerable to recruitment by radical Islamists.

Respectfully submitted,

ZACARIAS MOUSSAOUI  
By Counsel



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