

e. Zacarias' emotional and developmental needs were neglected. He had to face racism, cultural changes, relocations and emotional losses on his own. He was never given a firm and clear foundation spiritually or emotionally. Although his mother was Muslim, she, like many first generation immigrants from North Africa, chose to raise her children in a secular fashion, consistent with the dominant French culture. The children received no religious education and only nominally practiced Islam.

f. As Zacarias grew older, he and his brother realized that if they were to make it in life, they would have to do it themselves. While still adolescents, they moved out of their mother's home and struggled even to eat, in order to stay in school and get an advanced education. They never had the support of either parent in these endeavors. They sought out their Islamic roots on their own, with no prior basis for assessing the divergent strains of Islamic teaching with which they were confronted.

g. Zacarias and his brother decided that their hopes for success as businessmen depended on learning English and after receiving the equivalent of bachelor degrees. They agreed that Zacarias would go to England to master English and advance his knowledge of business and marketing.

h. Zacarias began to deteriorate in England. While he suffered deprivation in order to obtain his education, his capacity to bear up under the strain of years of neglect began to show and he became more and more emotionally and behaviorally changed and unable to manage his life. He had no support system, as he was separated from his family and friends in France. As his personal and financial circumstances deteriorated in a foreign country, he initially sought identity with a moderate Mosque, but was subsequently exposed to the propaganda and enticements of the radical Mosques which flourished in London in the 1990s.

i. The history of his parents' families in Morocco will also be discussed, including the history of mental illness.

Ms. Vogelsang's testimony will be based upon numerous interviews she and others have conducted and her review of personal and family records. She will not render an opinion as to any diagnosis of the defendant. It is not clear to the defense whether Ms. Vogelsang's testimony constitutes expert testimony of a mental condition.

Nancy C. Andreasen, M.D., Ph.D.: Dr. Andreasen will testify that Mr. Moussaoui suffers from a major thought disorder, most likely schizophrenia. In addition to the information contained in the reports of Dr. Amador, she will rely on her analysis of Mr. Moussaoui's writings, his appearances in court and the previously filed reports of Dr. Amador. She will rely,

in part, on “The Scale for the Assessment of Thought, Language and Communication” (TLC), the Scale for Assessment of Positive Symptoms” (SAPS) and the Scale for Assessment of Negative Symptoms” (SANS), upon which she has relied as a result of the inability of defense experts to interview the defendant.

ZACARIAS MOUSSAOUI

By /S/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of January, 2006, a true copy of the foregoing Notice was served upon AUSA Robert A. Spencer, AUSA David J. Novak and AUSA David Raskin, U.S. Attorney's Office, 2100 Jamieson Avenue, Alexandria, VA by delivering it to them by hand.

_____/S/_____

Gerald T. Zerkin