

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

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	
	)	<b>Criminal No. 01-455-A</b>
<b>ZACARIAS MOUSSAOUI</b>	)	

**SUPPLEMENTAL EXHIBIT IN SUPPORT OF REQUEST FOR THOROUGH  
CURRENT COMPETENCY EVALUATION (SET FORTH IN STANDBY COUNSELS'  
MEMORANDUM REGARDING RULE 11 CONSIDERATIONS)**

Attached is an “Expert Statement Regarding Adjudicatory Competence” (and accompanying curriculum vitae and declaration describing the medical literature and historical experience concerning the psychiatric effects of solitary confinement and other conditions of restricted environmental and social stimulation) prepared by Dr. Stuart Grassian, M.D., an expert in the psychiatric effects of isolated confinement in prison.

Dr. Grassian’s statement provides information on the effects of isolation in confinement—conditions confronting Mr. Moussaoui— effects that can include florid psychotic delirium, incoherence, intense agitation and paranoia. Dr. Grassian concludes that Mr. Moussaoui’s background would place him at high risk for the development of a serious psychiatric disorder and a premonitory psychosocial adjustment. Dr. Grassian further concludes, from a review of the psychiatric reports provided to the court thus far, that Mr. Moussaoui appears to have become increasingly obsessional, and increasingly paranoid during his incarceration, symptoms that are extremely typical of the psychopathological effects of solitary confinement (p. 9).

In sum, Dr. Grassian agrees with Drs. Amador and Stejskal and rejects Dr. Patterson’s reliance on “culture” and “political beliefs”, finding that Drs. Amador and Stejskal provide

compelling, detailed evidence that Mr. Moussaoui's thinking and behavior are irrational, paranoid, and quite likely, psychotic. His thinking and decisions lack any internal coherence or logic, and seem to reflect a gradually deteriorating mental state (p. 10). Finally, Dr. Grassian concurs that there is substantial evidence that Mr. Moussaoui is mentally impaired and incompetent to fire his attorneys (p. 10). Such a state would also render Mr. Moussaoui incompetent to enter a plea of guilty.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing SUPPLEMENTAL EXHIBIT IN SUPPORT OF REQUEST FOR THOROUGH CURRENT COMPETENCY EVALUATION (SET FORTH IN STANDBY COUNSELS' MEMORANDUM REGARDING RULE 11 CONSIDERATIONS) was served upon AUSA Robert A. Spencer, AUSA David Novak, and AUSA Kenneth Karas, U.S. Attorney's Office, 2100 Jamieson Avenue, Alexandria, Virginia 22314 BY FAX and by placing a copy BY HAND in the box designated "USAO" in the Clerk's Office of the U.S. District Court for the Eastern District of Virginia and facsimile and via first class mail to Zacarias Moussaoui, c/o Alexandria Detention Center, 2001 Mill Road, Alexandria, VA 22314 this 25th day of July, 2002.

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/S/

Frank W. Dunham, Jr.