

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

STIPULATION OF
EXPECTED TESTIMONY

Ms. Debra Van Alstyne

10 June 2013

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if Ms. Debra Van Alstyne were present to testify during the merits phase of this court-martial, she would testify substantially as follows:

1. I am the Aunt of PFC Bradley E. Manning. Brad came to live with my family in the summer of 2006. Brad uses my home as his home of record and spends his leave and holidays with us. When Brad came back from Iraq for his mid-tour leave in January of 2010, he stayed with us at my house. Brad came home on Sunday, the 24th of January. On the night of the 25th of January he went to Boston to visit his friends. Brad returned from Boston on Monday, the 1st of February and came back to stay with us for the remainder of his time. When Brad returned, we got hit with a big snow storm on Friday night, the 5th of February, so we ended up not doing very much other than playing board games. After the snow storm, we were without power until Sunday, the 7th of February. I recall Brad leaving during this time by walking out to the main road and telling me that a friend was going to pick him up. I do not know where he went, as it was not my usual practice to ask him where he was going. Brad left for Iraq on the morning of the 9th of February.

2. On November 2nd, 2010, Special Agent (SA) Mark Mander searched my house in connection with this case. I willingly consented to this search. Prior to the search, I identified items belonging to Brad and allowed SA Mander to search Brad's room in the basement. I also identified Brad's possessions and several boxes that contained Brad's possessions. These boxes and the surrounding area only contained Brad's possessions. One of the boxes was a box that Brad had sent to me in April of 2010 from Iraq. The box contained two soft cover books, two Maryland T-shirts and one FOB Hammer Iraq T-shirt. After SA Mander finished his search, he set aside a number of items on Brad's bed and asked me whether any of the items belonged to me or anyone else, and not Brad. I identified all the items as belonging to Brad. I am familiar with the items that were collected by SA Mander. He collected several of Brad's personal items like books, packages, and digital media.

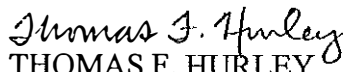
3. SA Mander, SA John Wilbur, SA Ronald Rock, and SA Ezio Veloso came to interview me on June 18th, 2010. The agents asked me several questions. One of the agents asked me about how Brad felt about the Army. Based upon our discussions, I knew that Brad was proud of his job and of being in the Army. However, Brad seemed to be very quiet when he returned from Iraq for his mid-tour leave. He also seemed depressed to me. The agents also asked me about the various email accounts that I had used over the years and that Brad had used over the years

and his Facebook account. I am familiar with Brad's email accounts. The account names that Brad used in communications with me are "bradley.e.manning@gmail.com" and "brad405@earthlink.net". I also told the agents the five different email addresses that I had used with Brad over the years. Most of those email addresses were either Gmail or EarthLink addresses. I am also familiar with Brad's Facebook account, as I followed Brad on Facebook and also posted a message to his Facebook page on his request after his arrest. Brad called me from Kuwait after his arrest. During our conversation, he asked me if I had seen the apache helicopter video. When I said that I had not, Brad asked me to do a search for "Collateral Murder." Brad believed the video was going to be "big news" and that it would make a "big splash" in America. As part of this conversation, Brad asked me to post a message to his Facebook account to let others know that he was alive and why he was arrested. I posted the following message for Brad: "Some of you may have heard that I have been arrested for disclosure of classified information to unauthorized persons See <http://collateralmurder.com/>."

4. I recognize the picture marked as **Prosecution Exhibit (PE) 40 for Identification. PE 40 for ID** is a picture of Brad in his room of taken while he was on his mid-tour leave. I know this because the picture captures how Brad and his room looked around that time period.



ASHDEN FEIN
MAJ, JA
Trial Counsel



THOMAS F. HURLEY
MAJ, JA
Military Defense Counsel



BRADLEY E. MANNING
PFC, USA
Accused