

UNITED STATES OF AMERICA)
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 v.)
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 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**
CDR Youssef Aboul-Enein
27 June 2013

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if CDR Youssef Aboul-Enein were present to testify during the merits phase of this court-martial, he would testify substantially as follows:

1. I am a Commander in the United States Navy and an officer in the Medical Service Corps. Additionally, I am a Middle East Foreign Area Officer. Since 2006, I have served as a Senior Counter-Terrorism Advisor, Warning Officer, and Instructor on Militant Islamist Ideology at the Joint Intelligence Task Force for Combating Terrorism (JITF-CT) in Washington DC. I advise the House Homeland Security Committee on Violent Islamist radicalization. I am also Military Adjunct Faculty for Middle East Counter-Terrorism Analysis at the National Intelligence University. I am currently assigned to the Defense Intelligence Agency (DIA) at Bolling Air Force Base. Previously, I served as Country Director for North Africa and Egypt, Assistant Country Director for the Arabian Gulf, and Special Advisor on Islamist Militancy at the Office of the Secretary of Defense for International Security Affairs from 2002-2006. While at the Office of the Secretary of Defense, I helped prepare Department of Defense officials to engage in ministerial level talks with their counterparts from Morocco to the Persian Gulf.

2. My education consists of a B.B.A from the University of Mississippi, an M.B.A and Masters in Health Services Administration from the University of Arkansas, an M.S. in Strategic Intelligence from the National Defense Intelligence College, as well as an M.S. in National Resource Strategy from the Industrial College of the Armed Forces (Class of 2009-2010). I am the author of "*Militant Islamist Ideology: Understanding the Global Threat*," and "*Iraq in Turmoil: Historical Perspectives of Dr. Ali al-Wardi from the Ottomans to King Feisal*," both published by Naval Institute Press. I also contributed to the counter-terrorism portion of the May 2012 edition of "Perspectives on Terrorism." I am rated proficient in the Egyptian, Peninsular, Levantine, Modern Standard (Upper Level) and Iraqi dialects of Arabic by the Defense Language Institute. My operational tours include Liberia, Bosnia, and the Persian Gulf. My personal awards include the Army Commendation Medal presented by General Tommy Franks, the Joint Service Achievement Medal presented by the Commandant of the Joint Forces Staff College, and the Defense Meritorious Service Medal (DMSM) awarded by the Secretary of Defense, a second DMSM awarded by the DIA Director for Analysis.

3. I have spent years studying Al-Qaeda (AQ). From its inception through 2011, AQ was a militant Islamist organization founded and led by Usama bin Laden (UBL). AQ's philosophy was of global Jihad and strict interpretation of Sharia Law. Jihad is a Koranic principle, but AQ's definition translated into "religious war against the infidels." AQ's definition of 'jihad' opposed any nation or organization that did not strictly adhere to Sharia Law as "infidels." Thus,

from its inception through today, AQ seeks to attack countries constituting the “West,” to include the United States and Western Europe. AQ also seeks to attack Arab regimes that AQ considers to be allied with the United States. For the purpose of my testimony, AQ was composed of its senior leadership and spokesmen as well as the senior leadership and spokesmen of its declared franchises, like Al Qaeda in the Arabian Peninsula.

4. From its inception, AQ was a terrorist organization that has been attacking the United States since the original attack on the World Trade Center in 1993, which killed six and wounded over one thousand. AQ claimed responsibility for the following attacks: (1) the 1998 bombing of US embassies in Kenya and Tanzania, which killed over 200 people and injured more than 5000 others, (2) the 2000 bombing of the USS Cole, which killed 17 sailors and injured more than 39 others, and (3) the 11 September 2001 attacks, which killed more than 3000 civilians and injured more than 5000 others. AQ continued to claim responsibility for international bombings throughout the 2000s. AQ, or organizations loosely affiliated with it, have claimed responsibility for attacking US forces and their coalition partners working in Iraq and Afghanistan with a variety of direct action engagements (e.g. direct fire engagements, indirect fire engagements, and improvised explosive device attacks). AQ sees itself as an enemy of the US; the 2001 Authorization for Use of Military Force is read to provide the authorization for US military actions against AQ and its affiliates.

5. From its inception, AQ claimed that it would attack (and claimed responsibility for attacking) civilian or military targets with different means and degrees of complexity. The United States has defended against AQ since the 1990s. In 1998, UBL was indicted in federal court for conspiracy to murder, bomb, and maim United States citizens. The United States has employed forces against AQ worldwide, to include Africa and the Middle East. AQ, like common criminals, required secrecy to carry out their direct action missions. As the US developed methods to respond to the stealthy tactics of AQ, their tactics evolved in order to continue their operations. This evolution – or creativity – compelled the same from the West to develop countermeasures. This cycle occurred from the inception of the defense against AQ through 2010.

6. AQ has also become more decentralized in response to the actions of the United States. AQ adopted a philosophy of creating a “leaderless environment” because it makes AQ terrorist cells harder to detect. This leaderless environment was born of necessity considering the West’s success in capturing and killing AQ leadership. From the perspective of AQ, self-radicalization aided the development of a “leaderless environment.” AQ sought to create hostility and turn the population of any given country against its secular leadership to create a leaderless environment. To encourage self-radicalization, AQ implored all Islamists, specifically the younger generations, to take it upon themselves to fight their enemies. AQ did not have a centralized organizational structure, which helped in facilitating the leaderless environment in which they operate. Those individuals that responded to the calls for self-radicalization would be considered “AQ-inspired.” “AQ-inspired” are indirectly connected to AQ.

7. Al Qaeda in the Arabian Peninsula (AQAP) is a terrorist organization that formed as a merger between AQ cells in Saudi Arabia and Yemen in 2003. From its inception through the end of 2010, AQAP claimed responsibility for : (1) an attack on Western expatriates residing on Saudi soil and (2) launching attacks against oil refineries. AQAP also claimed responsibility for the

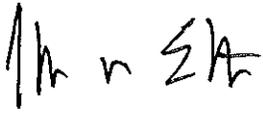
failed “underwear bomber” attack of 2009. AQAP was the most creative “franchise” from its inception through the charged time period.

8. From its inception, AQ used the media to achieve its goals, gain notoriety, and inspire individuals to join in terrorist activities. AQ used the media for fundraising as well. This money would then be used to fund training, missions, bribes, media creation for propaganda and recruiting, and traveling. AQ used its notoriety to seek facilitators who would launder money, obtain items not easily located in AQ’s area of operation, move members of AQ to new destinations, and smuggle recruits.

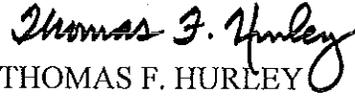
9. From its inception, media perception was important to AQ. Any event that placed AQ in a positive light or depicts forces adversarial to AQ in a negative light would have been seen as beneficial by AQ. Acknowledgement of successful attacks against enemy forces would have likely boosted morale and may have led to a corresponding increase in attacks. Events that undermined cooperation with foreign leaders would have, from the perspective of AQ, increased antagonism toward those leaders and created an environment in which terrorist ideology excels.

10. Throughout the 1990s and early 2000s, AQ used media outlets to deliver its recorded messages to a broader audience. In time, AQ decided to release its messages directly to the Internet through its media arm, As-Sahab. As-Sahab has been designed to operate like a media outlet. The golden As-Sahab logo in Arabic calligraphy was patterned off the golden logo of Al-Jazeera, which also features Arabic calligraphy. From its inception through 2010, As-Sahab made videos to recruit and spread AQ propaganda. Propaganda was thought by AQ to be essential for these missions because it established AQ’s credibility as an effective terrorist organization.

11. AQ has used the Internet since the 1990s. AQ used the Internet as means of communication for its leaders and members. As the Internet grew to host more information, communication through cyberspace, such as the Internet, was the preferred method of communication because AQ did not have a centralized organizational structure and AQ members were constantly moving in order to avoid being captured or killed by anti-AQ forces. AQ used the Internet for research for potential targets, recruits, and facilitators. AQ used the Internet for research since at least the early 2000s. As AQ developed its own resources such as As-Sahab, AQ shifted more of its attention onto the Internet. AQ used websites with users who were sympathetic to its goals. AQ also used all publicly available websites. AQ used websites that described United States government resources, websites that contained United States government information, and websites that researched United States government information to gather intelligence that may be useful in planning attacks against the United States. AQ also searched for information related to the United States government that would have been used for propaganda to undermine the United States or its allies, especially diplomatic information.



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