

**EXHIBIT TO THE
WITNESS STATEMENT
OF
MARK STEPHENS
(CJ Act 1967, s.9 MC Act 1980, ss.5A(3)(a) and 5B;
Criminal Procedure Rules 2010, Rule 27)**

EXHIBIT MS-1

CHRONOLOGY

Dramatis personae

J - Mr Julian Assange
 A - First Complainant, Brotherhood Party Official
 B - Second Complainant
 C - Journalist friend of A
 D - Journalist friend of J and A
 H - J's Swedish lawyer

| DATE | EVENT |
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| January 2010 | A sets up "revenge" website |
| July 2010 | B reads about J and becomes determined to meet him. Finds out that he is lecturing in Stockholm on 14 August 2010 and she decides to attend. |
| 10-12 August 2010 Wednesday/Thursday | A tells C and others that she will be away from her single room, single bedded flat on Friday 13 August 2010 so J can stay there alone. |
| 13 August 2010 Friday | J moves into A's flat. A arrives without explanation, takes him to dinner and invites him to bed. She supplies condom and they have intercourse several times (7 days later, she will make telephone allegations relating to these events on 13-14 August 2010 on which offences 1 and 2 in the EAW are based). |
| 14 August 2010 Saturday | |
| Early morning | A takes photo of J asleep in her bed (unauthorised), later posted on internet. |
| 9.30am | C calls at flat to collect J for lecture and is amazed to find A there. She makes no complaints against J. |
| 11.00am | A supervises media on behalf of "the Brotherhood" at J's lecture. She complains to nobody about him. B attends, waits for J afterwards, and invites herself to lunch with party officials and A, C and D. |
| 1.30pm | At luncheon, A proposes to hold a "crayfish party" that night in J's honour. |
| 2.00pm | A writes on twitter " <i>Julian wants to go to a crayfish party. Anyone have a couple of available seats tonight or tomorrow?</i> " (Evidently, she intends to accompany him but then decides to hold a party at her own flat). |
| 3.00pm | B, having flirted with J at lunch, takes him to History Museum cinema and they engage amorously in the back row, exchanging telephone numbers before he leaves for the crayfish party at A's |

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| | flat. |
| 8.00pm | Crayfish party with A's friends and C and D. A acts warmly towards J, B calls him at 11.15pm. |
| 15 August 2010 Sunday | |
| 2.00am | A writes on twitter " <i>Sitting outdoors at 2.00am, hardly freezing, with the world's coolest smartest people</i> ". She is asked by C whether she wants J to move out of her apartment but she insists that he stay. When C offers to take J with him, she says "No, it's not a problem, he is very welcome to stay here". At one point she refers to their previous night together and says only that she "felt dumped" when he left her bed to work on his computer. |
| Evening | A again hosts dinner for J, speaks highly of him and refuses offers to host him elsewhere. B, meanwhile, is told by friends to whom she confides her desires for him, "the ball is in your court". |
| 16 August 2010 Monday | <p>J has dinner with A and others. A still makes no complaint. She is in regular text messaging communications with C, complaining only that he doesn't take a shower and saying that she has insisted on washing his clothes. She says to C that she takes care of his laundry, makes sure he eats properly and feels like his step-mother. They have a cordial telephone conversation in which they joke about J being their first adopted child.</p> <p>J repeatedly asks on this day and throughout the week whether she wants him to leave but on each case she refuses.</p> |
| 17 August 2010 Tuesday | J at meetings all day. B calls him twice and arranges to meet him at 9.00pm. She takes him to dinner and invites him to her home to which they must take a train (B pays). They have intercourse several times with condoms supplied by B. She gives an account of one sexual engagement, in the morning, which is the basis for offence 4 (rape) in the EAW. She surmises from an ubiquitous reply that he is not using a condom, but admits that she does not object verbally or physically, and let him continue, telling the police "she didn't have the energy to tell him". |
| 18 August 2010 Wednesday | B leaves flat to buy breakfast that she makes for J after she claims that he had entered her without a condom. She says she jokes with him about him having to pay her student loans and about having a baby they would call "Afghanistan". |
| 2.00pm | J returns to Stockholm for a meeting with the Journalist Association President. C remains in contact with A, who continues to insist that J should stay with her and speaks warmly of him. |
| 19 August 2010 Thursday | As a result of conversations with friends, B has become worried about the possibility of contracting STD. She calls A to find out how to contact J and they realise they have both had sexual relations |

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| | with him. A calls C and threatens that they will both go to the police unless J goes to the hospital to take an STD test. C calls J who, according to C, reacts in shock and bewilderment to the allegations: he says "I can do a blood test, but I do not want to be blackmailed to take a blood test....I'd prefer to do it out of goodwill rather than having been blackmailed into doing it". |
| Thursday/Friday | A and B make contact with Claus Borgstrom, a politician and lawyer, and with a tabloid newspaper, <i>Expressen</i> . Text messages from them (which the prosecutor has refused to disclose, but which J's Swedish attorney has seen) speak of revenge and of the opportunity to make lots of money and going to <i>Expressen</i> . |
| 20 August 2010 Friday | A and B give telephone interviews to the police making their allegations. weekend prosecutor, Kjellstrand, admits to <i>Expressen</i> that rape allegations have been accepted against J. Naming him in this fashion is a breach of Swedish law but it gives <i>Expressen</i> the right to publish its scoop: "WikiLeaks Founder Wanted for Rape in Stockholm". This rape allegation is instantly reported around the world. |
| 21 August 2010 | Chief Prosecutor, Eva Finne, cancels the arrest warrant. In a formal press statement she announces her finding that there was no reason that he should be subject to arrest. |
| 22 August 2010 | The prosecuting authority issues a further press statement denying that it took the initiative in publishing J's name and blames a "news organisation". It confirms that "Assange is not suspected of rape and he is therefore no longer wanted for arrest". |
| 23 August 2010 | The prosecuting authority issues a further apologetic press release. It is announced that Prosecutor Kjellstrand is under judicial investigation for her handling of the matter and for speaking to the media. |
| 24 August 2010 | Charges are filed against Prosecutor Kjellstrand for violating Swedish secrecy laws. Senior Prosecutor Finne formally dismisses the rape allegation and A's sexual harassment charges against J. She will continue her investigation into whether A was "harassed" and will interview J. |
| 27 August 2010 | The Complainants' lawyer, Claes Borgstrom, asks that the case be reopened by another prosecutor based in Gothenburg, namely, Marianne Ny. J has no right to intervene and is not represented. |
| 30 August 2010 | J, who has stayed in Stockholm, willingly meets with police and gives them an interview answering all their questions and denying the allegations. They promise him confidentiality but his interview appears the next day in <i>Expressen</i> . |
| 1 September 2010 | Case is transferred to MN. |
| 8 September 2010 | Still no news from police or prosecutor so J's lawyer (H) calls MN, asking for an update and explaining that J has pressing |

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| | commitments in London. MN declines to provide information or even to indicate the charges - she says these will only be provided when he is further interviewed. |
| 14 September 2010 | H writes to MN to request permission for J to leave Sweden, and makes a formal request for the evidence. |
| 15 September 2010 | MN calls H to say that J is free to leave Sweden, as he is not under arrest. She refuses to give any details of the charges. H asks that any further questioning should take place in the next few days so that J can get it over with before he has to leave, but MN says that her investigator is sick and she does not want to bring in another. |
| 30 September 2010 | H calls Prosecution office and says that J could return for an interview on 10 October. Prosecution says date is inconvenient. |
| 8 October 2010 | H calls MN and tells her that J is now heavily committed in the United Kingdom, but would be happy to cooperate by offering a lengthy telephone interview (just like the complainants, whose interviews have all been by telephone) or by videolink or by skype, or by attending at the Swedish embassy in London or at Scotland Yard. These offers are repeated throughout the month and all are declined. MN insists that J return at his own expense and refuses to give assurance that he will not be arrested on his arrival. She is repeatedly reminded of Article 6 of the ECHR and J's right to be informed of the accusation and the charges and in English, but to no avail. |
| 2 November 2010 | Finers (his UK lawyers) write to DC Potter at the Extradition Squad after public threats by MN to obtain an EAW. They ask to be notified of any warrant. By telephone, solicitors explained that he is anxious to cooperate and if a warrant is issued they will make arrangements for him to come in without fuss. |
| 8 November 2010 | DC Potter confirms receipt of letter. |
| 12 November 2010 | Further letter from H to MN, repeating once again the offers for interviews from London and repeating requests for information and evidence. |
| 18 November 2010 | Custody hearing in Sweden. J sentenced to custody in absentia. |
| 20 November 2010 | First EAW communicated to Europol (still not disclosed) despite requests to CPS and SOCA for it to be disclosed). |
| 22 November 2010 | Formal request in Sweden under Rule 23:18 for text message evidence and a copy of the first EAW. MN has not complied with this formal request. |
| 24 November 2010 | Court of Appeal in Sweden issues a ruling on custody measures in which it downgrades the rape accusation and strikes out one of the sexual molestation allegations. |
| 6 December 2010 | Extradition squad calls FSI and arranges a meeting by consent to |

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| | arrest J the following day. |
| 7 December 2010 | Bail refused. Finers are told by prison that they cannot see him until 13 December 2010. Prison allows one extra legal visit for one hour on 9 December 2010. |
| 9 December 2010 | Prison visit. J being kept in isolation and denied more than two telephone calls and denied computer. |
| 13 December 2010 | Prison visit. J being kept in solitary confinement, denied computer, restricted access to telephone calls and mail is censored. |