

I am a detailed Security Expert for the defense in the case of US v. PFC Bradley Manning. I understood that I, or my fellow expert Charles Ganiel, was required to be present at any witness interviews in which classified information would be discussed. In discharging those duties, I recall being present for at least five witness interviews with Mr. Danny Lewis.

I cannot recall the exact date of the first meeting, but I believe that it was in either late 2012 or early 2013. The meeting took place in the office Mr. Lewis occupied at the time in Quantico, Virginia. The following people were present at that meeting: Mr. Lewis, MAJ Thomas Hurley, someone from DIA, and myself. After introductions, I can recall Mr. Lewis saying that he has oversight generally into what information the enemy is looking for given his access to the ongoing counterintelligence operations. Mr. Lewis indicated that there was no way to determine the actual value of classified documents. Mr. Lewis indicated that he was not an expert in determining value of classified information. Mr. Lewis could only use the past or existing missions as a guide to make any decisions. Mr. Lewis also indicated that he was unclear what he was going to be testifying about at this trial.

The second meeting with Mr. Lewis occurred in May of 2013. That interview occurred in a conference room at my workplace at INSCOM. The following people were present at that meeting: Mr. Lewis, MAJ Hurley, and myself. From this interview, I recall Mr. Lewis indicating that there was no way of actually determining the value of classified documents. Mr. Lewis then indicated to MAJ Hurley and myself that the only things he could talk about would be what US government information adversaries would be interested in and what they would do with it. By that time, Mr. Lewis did understand what he was going to testify about, but only in general and vague terms. Mr. Lewis did not know of any training or educational classes that could train you to value classified information. Mr. Lewis asked me if I had ever heard of anything like that, and I told him I had not. Mr. Lewis told us that all we could use was historical information from similar incidents that occurred in the past. Mr. Lewis told us again that he did not consider himself an expert at valuing classified information. Mr. Lewis told us then that he had not reviewed any of the evidence in this case. Mr. Lewis also indicated that he could not remember anything specifically about the historical data that had been captured.

The third meeting occurred in June of 2013 in the days leading up to the testimony of Mr. Lewis. I recall this meeting taking place the Thursday prior to the testimony of Mr. Lewis in the defense trailer near the courtroom here on Fort Meade. The following people were present at that meeting: Mr. Lewis, MAJ Hurley, and myself. I recall Mr. Lewis saying that he was going to testify about the contents of the charged documents in this case. He also indicated that he did not then consider himself an expert at valuing classified information and that he had never considered himself an expert at it. This was the first time Mr. Lewis showed us the documents that he had pulled from his colleagues at DIA. He also indicated that he did not know how he was going to testify about the value of classified documents when he only had the contents of those documents to use in making any determination.

The fourth meeting occurred in June of 2013 in the days leading up to the testimony of Mr. Lewis. I recall this meeting taking place on a Friday in the witness trailer at the courtroom on Fort Meade. The following people were present at that meeting: Mr. Lewis, MAJ Hurley, and myself. Mr. Lewis was asked again about the nature of his testimony, and Mr. Lewis talked about the data he pulled from his

colleagues at DIA. In this meeting, Mr. Lewis again indicated that he was not an expert. I recall MAJ Hurley asking him how he could make any valuation determination, and he could only reference the documents pulled from DIA. Mr. Lewis indicated that he was not part of any valuing determinations in his official duties. Finally, he talked about failed operations and how they were or were not used in determining the value of classified documents.

The fifth meeting occurred in June of 2013 in the days leading up to the testimony of Mr. Lewis. I recall this meeting taking place on a Monday. The following people were present at that meeting: Mr. Lewis, MAJ Hurley, and myself. MAJ Hurley asked Mr. Lewis again about the value of documents. Mr. Lewis talked about the documents he pulled from DIA and how they were compiled for his testimony. Mr. Lewis also talked about his then discontinued access to the information from DIA because his role with that organization had changed.

I have talked to Mr. Ganiel. He indicated to me that he was never present for any other witness interviews with Mr. Lewis.



CASSIUS N. HALL  
Detailed Security Expert