[redacted]

UNITED STATES OF AMERICA	)	
	)	
v.	)	**Updated Prosecution Witness List #3**
	)	
Manning, Bradley E.	)	
PFC, U.S. Army,	)	
HHC, U.S. Army Garrison,	)	**2 December 2012**
Joint Base Myer-Henderson Hall	)	
Fort Myer, Virginia 22211	)	

(U) The prosecution may call the below witnesses to testify on the merits at trial and/or during the presentencing phase[1] of the above-captioned court-martial. After each witness name is a brief description of the general substance of witness testimony, including whether the prosecution currently intends to elicit classified information during their testimony.

(U) This witness list is provided as an update to the 26 October 2012 witness list to inform the Court and the defense of the removal of witnesses, an update to a witness's name, and updates to unit information for several witnesses. The removal of eight witnesses from testifying during the sentencing portion of the trial is the only substantive update made to this witness list.

(U) The below witnesses are only offered to testify regarding information concerning the accused, the charged misconduct, the classified information used by the prosecution to prove the charges and their specifications, and classified information that is related to the impact or damage resulting from the accused's charged misconduct. The prosecution does not intend to elicit "Top Secret" or "Sensitive Compartmented Information" from any of these witnesses.

1. [redacted]

2. (U) ^ SFC Paul Adkins, Headquarters and Headquarters Company, 2d Battalion, 14th Infantry Regiment, 2d Brigade Combat Team, 10th Mountain Division (LI), Fort Drum, NY, 13602, (b) (6) [redacted]. He will testify about the accused's training, activities; and

[1] As of the date of this filing, persons identified with an asterisk ("*") are witnesses only for purposes of the presentencing phase; persons identified with a caret ("^") are witnesses for purposes of presentencing and merits.

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APPELLATE EXHIBIT 436
PAGE REFERENCED:_____
PAGE____OF____PAGES

duties. For sentencing, he will testify about the impact of the accused's actions on him and the unit.

3. (U(b) (7)(C))(b) (6) . She will testify concerning the accused's execution of an SCI NDA.

4. (U)(b) (7)(C) Office of Personnel Management, Boyers, PA, 16016,(b) (6)). She will testify as to the authenticity of the OPM records.

5. (U) Mr. Maxwell Allen, Central Intelligence Agency, McLean, VA, 22101, POC: Ms. Jennifer M., (b) (6) . He will testify as to the authenticity of the OSC logs, including classified information concerning the administration of the logs and the substance of the logs as it relates to the accused.

6. (U) SPC Mary Amiatu, Camp Arifjan, Kuwait, APO AE, 09306,(b) (6) - She will testify as to the authenticity of the JAMMS records.

7. (U) SPC Kyra (Marshall) Amos, Bravo Company, 57th Signal Battalion, Ft. Hood, TX, 76544 (deployed to Afghanistan), (b) (6) . She will testify concerning her use of the supply room computer.

8. (U) SFC Jose Anica, Headquarters and Headquarters Company (HHC), National Ground Intelligence Center (NGIC), Charlottesville, VA, 22911, (b) (6) He will testify about the accused's intelligence systems training and the accused's activities at 2/10, including potential classified information.

9. (U) Mr. Peter Artale, 902d MI Group, Fort Meade, MD, 20755, (b) (6) . He will testify as to the authenticity of the ACIC logs, including classified information concerning the administration of the logs and the substance of the logs as it relates to the accused.

10. (U) SPC Eric Baker, 10200 N. Riva Ridge Loop, Ft. Drum, NY, 13602, (b) (6) . He will testify about the accused's activity in his CHU and the accused's activities at 2/10.

11. (U(b) (7)(C) , Headquarters and Headquarters Company (HHC), 2nd Brigade Combat Team (2BCT), 10th Mountain Division (LI), Fort Drum, NY, 13602, (b) (6) She will testify about her deployment with the accused and the duties of a 35F, including classified information.

12. (U) WO1 Kyle Balonek, Headquarters and Headquarters Company (HHC), Headquarters and Headquarters Battalion (HHBN), 10th Mountain Division (LI), Fort Drum, NY, 13602, (b) (6) He will testify about the requirements of being a 35F, the accused's duties and work product, including classified information.

13. (U) CW4 (b) (7)(C) t, US Army Intelligence Center and Center of Excellence, Fort Huachuca, AZ, 85613, (b) (6) He will testify as to the authenticity of the AIT documents.

14. (U) Mr. Joseph Benthal, Watertown, NY, 13601, (b) (6) 5. He will testify about the requirements for access to government systems at 10th Mountain Division.

15. (U) SA Troy Bettencourt, U.S. Department of Treasury, Washington, DC, 20220, (b) (6) He will testify about the IA training the accused received, authentication of multiple pieces of evidence, and the information that the accused leaked to WikiLeaks, including classified information.

16. (U) SSG Peter Bigelow, US Army NATO, Allied Forces Command South, Naples, Italy, FPO AE, 09620, (b) (6) He will testify about the accused's duties in the supply room and the accused's access to computer systems.

17. (U) Mr. Wyatt Bora, Air Force Research Laboratory, Rome, NY, 13440 (b) (6) - He will testify about the CIDNE database, its value, and how it appeared at a particular time, including classified information.

18. (U) SA (b) (7)(C) n, 3rd MP Group (CID), Ft. Eustis, VA, 23604, (b) (6). He is a chain of custody witness.

19. (U) Mr. Steve Buchanan, Intelink, Fort Meade, MD, 20755, (b) (6). He will testify as to the authenticity of the Intelink logs, including classified information concerning the administration of the logs and the substance of the logs as it relates to the accused.

20.

21. (U) Mr. Sean Chamberlin, 902d MI Group, Fort Meade, MD 20755, (b) (6) 5. He will testify about how the ACIC logs data, how to read the logs, and the content of the logs, including classified information.

22. (U) ^ CPT Thomas Cherepko, NATO Force Command, Madrid, Spain, 28 (b) (6) . He will testify about the 2/10 Mountain share drive and its contents, as well as the requirements to access it. For sentencing, he will also testify regarding the impact on the S-6 as a result of numerous investigations into the accused's misconduct.

23.

24. (U) SA Charles Clapper, Arizona Branch Office - Computer Crime Investigative Unit, Fort Huachuca, AZ, 85613, (b) (6). He is a chain of custody witness.

25. (U) (b) (7)(C), RedJack, Silver Spring, MD, 20910, (b) (6). He will testify about the Centaur logs, including potential classified information concerning the administration of the logs and the substance of the logs as it relates to the accused.

26. (U) Mr. (b) (7)(C), US Army Human Resources Command, Fort Knox, KY, 40122, (b) (6). He will testify as to the authenticity of the accused's OMPF.

27. (U) SGT Lorena DeFrank (Cooley), Headquarters and Headquarters Company (HHC), 2nd Brigade Special Troops Battalion (2BSTB), 2nd Brigade Combat Team (2BCT), 10th Mountain Division (LI), Fort Drum, NY, 13602, (b) (6). She will testify about the accused's work product and the accused's activities within 2/10, including classified information.

28. (U) * Ms. Elizabeth Dibble, Principal Deputy Assistant Secretary, Bureau of Near Eastern Affairs, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) 7 / Ms. Elizabeth O'Connor, (b) (6). She will testify at sentencing about the impact to Near Eastern Affairs, including classified information.

29.

30. (U) Mr. Jim Downey, Defense Information Systems Agency, Fort Meade, MD, 20755, (b) (6). He will testify about Centaur logs, including potentially classified information concerning the administration of the logs and the substance of the logs as it relates to the accused.

31. (U) SA (b) (7)(C), El Paso, TX 79924, (b) (6). He is a chain of custody witness.

32. (U) SA Antonio Edwards, Homeland Security Investigations, National Security Unit, Atlanta, GA 30301, (b) (6). He is a chain of custody witness.

33. (U) SA Kirk Ellis, Rock Island Fraud Resident Agency, Major Procurement Fraud Unit, Moline, IL, 61265, (b) (6). He is a chain of custody witness.

34. (U) ^ Mr. John Feeley, Principal Deputy Assistant Secretary, Bureau of Western Hemisphere Affairs, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). He will testify about the content of the charged cables originating from and sent to the Western Hemisphere on the merits (specifically, 07 Bogota 101; 07 Bogota 5118; 07 Bridgetown 23; 07 Buenos Aires 1341; 07 Caracas 2346; 07 Caracas 35; 07 Kingston 25; 07 La Paz 1949; 07 Lima 2400; 07 Panama 1197; 07 Panama 1198; 07 San Salvador 1375; 07 Santo Domingo 28; 09 Bogota 2873; 09 Brasilia 1112; 09 Brasilia 1113; 09 Caracas 1168; 09 Lima 1309; 09 Mexico 2658; 09 Santiago 831; 09 Santiago 833; 09 Santiago 835; 09 Santo Domingo 1017; 09 Tegucigalpa 891; 09 Tegucigalpa 892; 09 Lima 333; 09 State 92655) and the impact to Western Hemisphere Affairs on sentencing, including classified information.

35. (U) Mr. (b) (7)(C) Nacon Consulting, LLC, Annapolis, MD, 21403, (b) (6) He will testify as to the authenticity of the accused's IA training.

36. (U) ^ CPT Matthew Freeburg, Fort Sill, OK, 73503, (b) (6). He will testify about the accused's activities while deployed. For sentencing, he will testify about the impact on the unit as the company commander.

37. (U) ^ CPT Casey Fulton (formerly Martin), 2nd Brigade Combat Team (2BCT), 10th Mountain Division (LI), Fort Drum, NY, 13602, (b) (6) She will testify about the accused's training, duties, and work product, including classified information. For sentencing, she will testify regarding the impact of the accused's misconduct on the S-2 shop.

38. (U) Mr. James Fung, Brookhaven National Laboratory, Upton, NY, 11973, (b) (6) He is a chain of custody witness.

39. (U) Ms. Shelia Glenn, Fort Meade, MD, 20755, (b) (6). She will testify about unclassified contents of the ACIC document in Specification 15 of Charge II.[2] The prosecution does not intend to elicit classified testimony from this witness.

40. (U) Mr. Mike Goldman, Brookhaven National Laboratory, Upton, NY, (b) (6). He is a chain of custody witness.

41. (U) SA Toni Graham, Hawaii CID Office, 1314 Lyman Road, Building 3026, Schofield Barracks, HI, 968(b) (6). She will testify about the law enforcement investigation in Iraq.

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[redacted]

42. (U) Mr. Jacob Grant, USCENTCOM, MacDill AFB, FL, 33621, (b) (b) (6) [redacted]. He will testify about the USCENTCOM server logs, including potentially classified information.

43. (U) CW3 Hondo Hack, Joint Multinational Readiness Center, Hohenfels Military Community, Germany, APO AE, 09173, DSN: (b) (6) [redacted]. He will testify about the accused's work product, including classified information.

44. (U) Mr. (b) (7)(C) [redacted], HQDA G-2, Washington, DC, 20310, ((b) (6) [redacted]. He will testify about information security.

45. (U) VADM Robert Harward, USCENTCOM, MacDill AFB, FL, 33621, USCENTCOM OSJA, (b) (6) [redacted]. He will testify as an original classification authority (OCA) that charged USCENTCOM information was properly classified, including classified information.

46. (U) Mr. Ben Henwood, Senior System Administrator, USCENTCOM Intelligent Software Solutions, Inc., Tampa, FL, 33609, (b) (6) [redacted] He will testify about the CIDNE database, including potentially classified information.

47. (U) Mr. John Hodges, Senior Technician, USCENTCOM Intelligent Software Solutions, Inc., Tampa, FL, 33609, (8(b) (6) [redacted]. He will testify about the CIDNE database, including potentially classified information.

48. (U) Mr. Patrick Hoeffel, Intelligent Software Solutions, Inc., 2001 Jefferson Davis Hwy, Suite 909, Arlington, VA, 22202, (b) (6) [redacted]. He will testify about the CIDNE database, including potentially classified information.

49. [redacted]

50. (U) Mr. Matthew Hosburgh, Westminster, CO, 80021, (b) (6) [redacted] He will testify about the C3 document.

51. (U) LT (US Navy) Thomas Hoskins, USCENTCOM, MacDill AFB, FL, 33621, (b) [redacted] He will testify about the content of charged USCENTCOM documents (6) containing J-5 information, including classified information.

52. (U) Ms. T(b) (7)(C) [redacted]n, 439 West Ten Eyck Street, Watertown, NY, (b) (6) [redacted]. She will testify about the authenticity of the accused's SCI Indoctrination packet.

53: (U) Mr. (b) (7)(C) [redacted]y, HQDA G-3/5/7, Army Pentagon, Washington, DC, 20310, (b) (6) [redacted]. He will testify about OPSEC.

[redacted]

[redacted]

54. (U) Ms. (b) (7)(C), Forensic Examiner, Federal Bureau of Investigation, Washington, DC, 20535, (b) (6). She is a chain of custody witness.

55. (U) Ms. Elisa K. (Rubin) Ivory, S2 OIC, 305th Military Intelligence Battalion, US Army Intelligence Center and Center of Excellence, Fort Huachuca, AZ, (b) (6) She will testify concerning requirements of being a 35F.

56. (U) Mr. Albert J. Janek, Director, Office of Continuity, Department of State, Washington, DC, 20520, Duty Station: U.S. Embassy, Kabul, Afghanistan, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). He will testify about the authenticity and chain of custody of the DoS server logs.

57. (U) Mr. (b) (7)(C), Deputy Chief Information Officer for Operations, Messaging Systems Office, Bureau of Information Resource Management, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). He will testify about NCD, including potentially classified information concerning how NCD originated, operated, and was maintained.

58. (U) ^ Mr. Mark Johnson, Digital Forensics and Research Branch, Computer Crime Investigative Unit, Quantico, VA, 22134, (b) (6). He will testify about his forensic analysis of the accused's digital media, including classified information concerning the contents of his forensic reports.

59. (U) * AMB Patrick F. Kennedy, Under Secretary for Management, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). He will testify on sentencing about the impact to the Department of State, including classified information concerning impact on foreign relations, foreign policy, and the management of the Department.

60. (U) SA (b) (7)(C), Washington Metro Resident Agency, Computer Crime Investigative Unit, Quantico, VA, 22134, (b) (6). He is a chain of custody witness.

61. (U) * Mr. John Kirchhofer, Chief of Enterprise Strategies, Office of Counterintelligence (CI) Human Intelligence (HUMINT) Enterprise Management, Defense Counterintelligence and Human Intelligence Center, Defense Intelligence Agency, Bolling AFB, DC, 20032, (b) (6). He will testify at sentencing about the impact on the Department of Defense, including classified information concerning specific impacts within the Department of Defense, the administration and operation of the IRTF, and contents of the IRTF damage assessment.

62. (U) * AMB Michael Kozak, Senior Adviser, Bureau of Democracy, Rights and Labor, Department of State, Washington, DC 20520, POC: Mr. Jonathan Davis, (b) (6) - Ms. Elizabeth O'Connor, (b) (6) He will testify on sentencing about the impact on individuals identified as persons at risk by the Department of State,

including classified information. This testimony will not include PII of any specific individual.

63. (U) Mr. Adrian Lamo, Carmichael, CA 95608, (b) (6) He will testify regarding his digital chat with the accused. The United States does not intend to elicit any classified information contained within the digital chat log.

64. (U) CW5 Jon Larue, DAMO-AV, Pentagon, DC, 20310, (b) (6). He will testify about the content of the Apache Video.

65. (U) ^ Mr. Danny J. Lewis, Defense Intelligence Agency, Bolling AFB, DC, 20032, (b) (6). He will testify about counterintelligence and the value of information, including classified information concerning the value of government information. For sentencing, he will testify about the impact of the compromise on counterintelligence, including classified information.

66. (U) ^ CPT Steven Lim, HQ, 1st Army Division-East, Fort Meade, MD, 20755, (b) (6) He will testify about the 2/10 Mountain share drive and its contents, the accused's training and duties, including potentially classified information. For sentencing, he will testify regarding the impact of the accused's misconduct on the S-2 shop.

67. (U) SA Je(b) (7)(C) Okinawa CID Office, Building 220 Unit 35139, Okinawa, Japan APO AP (b) (6) 3. She will testify about the investigation in Iraq.

68. (U) Mr. (b) (7)(C) Forensic Examiner, Federal Bureau of Investigation, Washington, DC, 20535, (b) (6). He is a chain of custody witness for classified information concerning four digital files extracted from digital media outlined at BATES #: 00505250-00505252.

69. [redacted]

70. (U) SGT Chad Madaras, Headquarters and Headquarters Company, 2d Battalion, 14th Infantry Regiment, 2d Brigade Combat Team, 10th Mountain Division (LI), Fort Drum, NY, 13602, (b) (6). He will testify about the 35F training, 2/10 pre-deployment training, and the use of his SIPRNET computers while deployed, including potentially classified information.

71. (U) Mr. Brian Madrid, 21057 W. Western Dr. Buckeye, AZ, 85326, ((b) (6) b. He will testify about the accused's training at AIT.

[redacted]

72. (U) Ms. Tamara Mairena, Headquarters, Computer Crime Investigative Unit, Quantico, VA, 22134, ([redacted]. She is a chain of custody witness.

73. (U) ^ SA Mark Mander, Washington Metro Resident Agency, Computer Crime Investigative Unit, Quantico, VA, [redacted] He will testify about Wikileaks operations, the investigation of the accused, and certain enemies of the United States being in possession of information, including classified information.

74. (U) SGT Alejandro Marin, 800th MP Brigade, Uniondale, NY, 11553, ([redacted]. He will testify about the accused's training at AIT.

75. (U) Mr. [redacted], Intelink, Fort Meade, MD, 20755, ([redacted]. He will testify about the Intelink logs, including classified information concerning the administration of the logs and the substance of the logs as it relates to the accused.

76. [redacted]

77. [redacted]

78. (U) Mr. Vince McCarron, HQDA G-2, Washington, DC, 20310, ([redacted]. He will testify about the DCGS-A system, including potentially classified information.

79. (U) M[redacted] USCENTCOM, MacDill AFB, FL, 33621, [redacted]. He will testify about the training received at AIT.

80. [redacted]

81. (U) Mr. James McManus, Brookhaven National Laboratory, Upton, NY, 11973, [redacted] He is a chain of custody witness.

82. (U) Ms. [redacted] Federal Bureau of Investigation, Washington, DC, 20535, [redacted] She is a chain of custody witness.

[redacted]

[redacted]

83. (U) ^ COL David Miller, BDE Modernization Command, Ft. Bliss, TX, (b) (6) He will testify about the accused's misconduct and the multiple administrative investigations.

84. (U) Mr. Jason Milliman, 262 Jefferson Drive West, Palmyra, VA, 22963, (b) (6) -. He will testify about the accused's access to DCGS-A, including potentially classified information.

85. (U) Mr. James Moore, Deputy Assistant Secretary, Bureau of South and Central Asian Affairs, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (202) 647-2227 / Ms. Elizabeth O'Connor, (b) (6). He will testify about the content of cables originating from South and Central Asia on the merits (specifically, 06 Colombo 1889; 06 Kathmandu 3023; 06 Kathmandu 3024; 07 Ashgabat 1359; 07 Dhaka 24; 07 New Delhi 80; 09 New Delhi 267; 09 State 92641), including classified information.

86. (U) Mr. Ken Moser, USCENTCOM, MacDill AFB, FL, 33621, (b) (6). He will testify about the information posted to the USCENTCOM OSJA SIPRNET website, including potentially classified information.

87. (U) ^ Mr. Jeffery Motes, JTF-GTMO, Guantanamo Bay, Cuba, (b) (6). He will testify about the JTF-GTMO database and the contents of compromised information, including classified information. For sentencing, he will testify about the impact resulting from the compromise of the JTF-GTMO database.

88. (U) Mr. Troy Moul, US Army Intelligence Center and Center of Excellence, Fort Huachuca, AZ, 85613, (b) (6). He will testify about instructing the accused at AIT.

89. (U) (b) (7)(C), DISA, Pensacola, FL, 32508, (8(b) (6). He will testify about the authenticity of the Centaur logs.

90. (U) Mr. Gerald Mundy, Information Systems Security Officer, Bureau of Intelligence and Research, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (202) 647-7246. He will testify about the authenticity and chain of custody of the DoS firewall logs, including potentially classified information.

91. (U) Mr. Nicholas Murphy, Reviewer, Office of Global Information Services, Bureau of Administration, Department of State, Washington, DC 20520 (When Actually Employed), POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6) He will testify as an OCA that Department of State information was properly classified, including classified information.

92.

93. (U) Lt Col (R) Martin Nehring, USCENTCOM, MacDill AFB, FL, 33621, (b) (6) (b) He will testify about the content of charged documents containing J3 information, including classified information.

94. (U) CW4 Ronald Nixon, ARCYBER, Fort Belvoir, VA, (b) (6). He will testify about the USF-I GAL.

95. (U) (b) (7)(C), CGSC, Ft. Belvoir, VA, 22060 (until OCT, then NIU at Bolling AFB), (b) (6). She will testify about the accused's activities at AIT.

96. (U) (b) (7)(C) Federal Bureau of Investigation, Washington, DC, 20535, (b) (6) He is a chain of custody witness for classified information concerning four files extracted from digital media outlined at BATES #: 00505250-00505252.

97. (U) SGT Daniel Padgett, Fort Leavenworth, KS, 66027, (b) (6). He will testify about the accused's training and duties and his interactions with the accused while deployed, including potentially classified information.

98. (U) AMB David Pearce, Deputy Assistant Secretary and Senior Deputy Special Representative for Afghanistan and Pakistan, Bureau of South and Central Asian Affairs, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). He will testify about the content of cables originating from Afghanistan and Pakistan on the merits (specifically, 06 Kabul 5420; 06 Kabul 5421; 06 Kabul 5435; 99 Islamabad 495), including classified information.

99. (U) Mr. H. Dean Pittman, Principal Deputy Assistant Secretary, Bureau of International Organization Affairs, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). He will testify about the content of cables originating from International Organizations on the merits (specifically 07 USUN New York 573; 07 USUN New York 575; 07 USUN New York 578), including classified information.

100. (U) (b) (7)(C), Headquarters and Headquarters Company, 2nd Brigade Combat Team, 10th Mountain Division (LI), Fort Drum, NY, 13602, (b) (6)2. He will testify about access to computer systems within the brigade.

101. (U) (b) (7)(C)e, Federal Bureau of Investigation, Washington, DC, 20535, (b) (6). She is a chain of custody witness.

102. (U) (b) (7)(C) , Federal Bureau of Investigation, Washington, DC, 20535, ((b) (6) . He is a chain of custody witness.

103. (U) SA Calder Robertson, Europe Branch Office - Computer Crime Investigative Unit, Funari Barracks, APO AE, 09008, DSN: ((b) (6) . He will testify about his forensic analysis of the accused's digital media, including classified information.

104. (U) I(b) (7)(C) , 1 Overcash Avenue, Chambersburg, PA, 17201, ((b) (6) . She will testify as to the authenticity of the DoD IA awareness training.

105. (U) ^ SA Ronald Rock, Assistant Regional Security Officer, Diplomatic Security Service, Department of State, Washington, DC, 20520, Duty Station: Consulate, Mazar-e-Sharif, Afghanistan, POC: Mr. Jonathan Davis, (b(b) (6) / Ms. Elizabeth O'Connor, (b))) (6) . He will testify about the chain of custody of the DoS firewall and server logs, including potentially classified information. For sentencing, he will discuss the impact of the compromise on the US Embassy at Reykjavik, including classified information.

106. (U)(b) (7)(C) , Forensic Examiner, Federal Bureau of Investigation, Washington, DC, 20535, (b) (6) . He is a chain of custody witness for classified information concerning four files extracted from digital media outlined at BATES #: 00505250-00505252.

107. (U) CW4 Armond Rouillard, G33, US Army Network Enterprise Technology Command, Ft. Belvoir, VA, 22060, ((b) (6) . He will testify about the value of information stolen from the USF-I GAL, including potentially classified information.

108. (U) SGT David Sadtler, 709th MI BN, Harrogate, UK, APO AE, 09468, DSN: (b) (b) (6) . He will testify about his interactions with the accused at 2/10 Mountain and the accused's activities during their deployment, including potentially classified material.

109. (U) Mr. Doug Schasteen, Wilco Technologies, Inc., 4125 Broadway, Suite 200, Kansas City, MO, 64106, (b) (6) He will testify about the authenticity of the accused's annual Information Awareness training.

110. (U) Ms. Jacqueline Scott, USCENTCOM, MacDill AFB, FL, (b) (6) She will testify about the response to the FOIA request for the Apache video, including potentially classified material.

111. (U) AMB Stephen Seche, Deputy Assistant Secretary, Bureau of Near Eastern Affairs, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) - (b) 7 / Ms. Elizabeth O'Connor, ((b) (6) . He will testify about the content of cables originating from the Near East on the merits (specifically, 05 Algiers 1836; 06 Algiers 1961; 06 Baghdad 2646; 06 Baghdad 4205; 06 Beirut 3603; 06 Beirut 3604; 06 Beirut 3703; 06 Kuwait 4430; 06 Kuwait 4438; 06 Riyadh 8811; 06 Tripoli 645; 06

Tripoli 648; 07 Baghdad 35; 07 Baghdad 36; 07 Baghdad 37; 07 Baghdad 42; 07 Baghdad 53; 07 Baghdad 56; 07 Baghdad 63; 07 Baghdad 64; 07 Baghdad 70; 07 Basrah 3; 07 Beirut 1958; 07 Riyadh 21; 07 Riyadh 22; 07 Riyadh 23; 07 Tunis 47; 08 Amman 535; 08 Cairo 569; 09 Baghdad 2390; 09 Riyadh 1156; 10 Rabat 294), including classified information.

112. (U) ^ SA David Shaver, U.S. Department of Treasury, Washington, DC, 20220, (b) (6). He will testify about his forensic analysis of the accused's digital media and information posted to WikiLeaks, including classified information, concerning the contents of his forensic reports.

113. (U) ^ Ms. Jihrleah Showman, Hamilton, GA, 31811, (b) (6). She will testify about the training the accused received before deployment, the accused's statements and activities before deployment, their duties during deployment and the accused's activities during deployment, including potentially classified information. For sentencing, she will testify about the impact of the accused's misconduct.

114. (U) (b) (7)(C) Forensic Examiner, Federal Bureau of Investigation, Washington, DC, (b) (6) She is a chain of custody witness for classified information concerning four files extracted from digital media outlined at BATES #: 00505250-00505252.

115. (U) SA Thomas Smith, USACIDC, Fort Gordon, GA, 30905, (b) (6). He will testify about the investigation in Iraq.

116. (b) (7)(C), Federal Bureau of Investigation, Washington, DC, 20535, (b) (6) He is a chain of custody witness.

117. (U) (b) (7)(C), Headquarters and Headquarters Battery (HHB), 1st Battalion, 37th Field Artillery Regiment (1-37 FA), 3rd Stryker Brigade, 2d Infantry Regiment (3/2 SBCT), Fort Lewis, WA (Deployed to Afghanistan), (b) (6) She will testify that she was the 2-10 security manager and witnessed the accused sign NDAs and acknowledgement of SCI briefings.

118. (U) (b) (7)(C), HQDA, G-1 (DAPE-MPT), Pentagon, DC, 20310, (b) (6) - (b) He will testify to the authenticity of the accused's ATTRS logs.

119. (U) (b) (7)(C), Chief, Operations Support Division G2X, 902d MI Monterey Field Office, Monterey, CA, (b) (6) He is a chain of custody witness.

120.

121. (U) * Ms. Susan Swart, former Chief Information Officer, Bureau of Information Resource Management, Department of State, Washington, DC 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). She will testify at sentencing about the impact to information systems at the Department of State, including potentially classified information.

122. (U) (b) (7)(C), Forensic Examiner, Federal Bureau of Investigation, Washington, DC, 20535, (b) (6). He is a chain of custody witness for classified information concerning four files extracted from digital media outlined at BATES #: 00505250-00505252.

123. (U) Ms. Tasha Thian, Agency Records Officer, Office of Global Information Services, Bureau of Administration, Department of State, Washington, DC 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). She will testify to the authenticity of all charged Department of State cables, including potentially classified information.

124. (U) SSG Robert Thomas, III, Headquarters and Headquarters Troop, Support Squadron, 3d ACR, Fort Hood, TX, (b) (6). He will testify about the training received at AIT.

125. (U) Ms. Louis Travieso, USCENTCOM, MacDill AFB, FL, 33621, (b) (6). He will testify about the content of the charged document(s) containing J-2 information, including classified information.

126. (U) M (b) (7)(C) USCENTCOM, MacDill AFB, FL, 33621 (b) (b) (6) He will testify about the USCENTCOM Sharepoint Server logs, including potentially classified information.

127. (U) (b) (7)(C), Headquarters and Headquarters Company, 2nd Brigade Special Troops Battalion (2 BSTB), 10th Mountain Division, (LI), Fort Drum, NY, 13602, (b) (6). He is a chain of custody witness.

128. (U) Mr. Greg Weaver, Compliance Branch Chief, US Army Cyber Command, Ft. Belvoir, VA, 22060 G36 Compliance Division, (b) (6). He will testify about information assurance.

129. (U) Ms. Florinda White, CERDEC Software Engineering Directorate, Aberdeen Proving Ground, MD, 21005, (b) (6). She will testify to the authenticity of DCGS-A documentation.

130. (U) SA John Wilbur, Department of Treasury, Washington, DC, 20220, (b) (6) - (b). He is a chain of custody witness.

131. (U) ^ SA Alfred Williamson, Digital Forensics and Research Branch, Computer Crime Investigative Unit, Quantico, VA, 22134, (b) (6) He will testify about his forensic analysis of the accused's digital media.

132. (U) Mr. Charlie Wisecarver, Bureau of Information Resource Management, Department of State, Washington, DC, 20520 (When Actually Employed), POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). He will testify about the NCD system, including potentially classified information concerning how NCD originated, operated, and was maintained.

133. (U) Mr. Alex Withers, Brookhaven National Laboratory, Upton, NY, 11973, (b) (6) - (b) (6). He is a chain of custody witness.

134. (U) RDML David Woods, Commander, JTF-GTMO, Guantanamo Bay, Cuba, POC: CDR T. Welsh, DSN (b) (6). He will testify as an OCA that JTF-GTMO information was properly classified, including classified information.

135. (U) AMB Don Yamamoto, Principal Deputy Assistant Secretary, Bureau of African Affairs, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). He will testify about the content of cables originating from Africa on the merits (specifically, 07 Addis Ababa 2197; 07 Lagos 719; 08 Dar Es Salaam 206; 08 Khartoum 246; 08 Khartoum 428; 09 Addis Ababa 1063; 09 Bamako 85; 10 Pretoria 636), including classified information.

136. (U) Mr. Garon Young, Headquarters, Computer Crime Investigative Unit, Quantico, VA, 22134, (b) (6). He is a chain of custody witness.

137. (U) AMB Marie Yovanovitch, Principal Deputy Assistant Secretary, Bureau of European Affairs, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). She will testify about the content of cables originating from or sent to Europe or Eurasia on the merits (specifically, 10 Reykjavik 13; 06 Belgrade 1681; 06 Madrid 2955; 06 Madrid 2956; 06 Pristina 947; 06 Pristina 948; 07 Ankara 23; 07 Ankara 2468; 07 Bratislava 665; 07 Minsk 1024; 07 Moscow 5824; 07 Moscow 5825; 07 Paris 4722; 07 Paris 4723; 07 Reykjavik 203; 07 Vilnius 13; 09 Paris 217; 09 Prague 88; 09 Pristina 58; 09 State 92632; 09 State 92657; 09 Brussels 382; 09 Geneva 347, including classified information.

138. (U) Mr. Joseph Yun, Principal Deputy Assistant Secretary, Bureau of East Asian Affairs, Department of State, Washington, DC, 20520, POC: Mr. Jonathan Davis, (b) (6) / Ms. Elizabeth O'Connor, (b) (6). He will testify about the content of cables originating from East Asia and the Pacific on the merits (specifically, 06 Seoul 3882; 06 Seoul 3885; 06 Suva 489; 06 Taipei 3830; 07 Bangkok 111; 07 Beijing 152; 07 Kuala Lumpur 40; 07 Rangoon 22; 07 Suva 18; 07 Vientiane 12; 10 Tokyo 627), including classified information.

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141.

(U) Several of these witnesses may become unnecessary depending on the outcome of subsequent Court rulings. The prosecution may add witnesses to this list, depending on the outcome of subsequent Court rulings, to include those relating to Military Rule of Evidence (MRE) 505 and any witnesses relating thereto. The prosecution may replace witnesses on this list, should it become necessary due to a Permanent Change of Station, job relocation, change in job position, or change in level of security clearance of a listed witness.

(U) The prosecution acknowledges an ongoing obligation to provide the defense prompt notice of any other potential witnesses that come to its attention and will adhere to the local rules. The prosecution will communicate its final witness list according to Rule 2.1.8 of the Rules of Practice before Army Courts-Martial (2012) and the Court's order.

(U) If the defense intends to produce a witness who is listed above, the defense must provide a separate, appropriate request for that witness in accordance with Rule for Courts-Martial (RCM) 703 and the standard articulated in United States v. Rockwood, 52 M.J. 98, 105 (1999) that a witness request include a "synopsis of expected testimony," not merely a list of

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[4] See *supra* note 3.

[5] See *supra* note 3.

topics to be covered. If necessary for a particular witness employed by the United States Government, the defense shall also comply with 5 U.S.C. § 301 and Touhy v. Ragen, 340 U.S. 462 (1951).

ASHDEN FEIN
MAJ, JA
Trial Counsel

(U) I certify that I served or caused to be served a true copy of the above, in person, on Mr. David Coombs, Civilian Defense Counsel, on 2 December 2012.

ASHDEN FEIN
MAJ, JA
Trial Counsel