[redacted]

UNITED STATES OF AMERICA	)	
	)	
v.	)	**Updated Prosecution Witness List #4**
	)	
Manning, Bradley E.	)	
PFC, U.S. Army,	)	
HHC, U.S. Army Garrison,	)	**31 January 2013**
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 2 December 2012 witness list. Unit and contact information is updated for several witnesses, descriptions are updated for six witnesses,[2] and four witnesses are deleted. Any new and substitute witnesses are footnoted. If necessary, the prosecution may replace additional 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 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.

(U) The prosecution will supplement its sentencing witness list with certain merits witnesses if the entered pleas negate the need to present that witness's testimony during the merits portion of the trial.

1. [redacted]

[1] (U) 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.

[2] (U) The changes in the witness descriptions are enclosed in "{}", including an empty "{}" where deletions occurred.

[redacted]

[redacted]

APPELLATE EXHIBIT 476
PAGE REFERENCED:_____
PAGE___OF___ PAGES

[redacted]

2. (U) ^ SFC Paul Adkins, Headquarters and Headquarters Company, 2d Battalion, 14th Infantry Regiment, 2d Brigade Combat Team (2BCT), 10th Mountain Division (LI), Fort Drum, NY 13602, (b) (7)(C) [redacted]. He will testify about the accused's training, activities, and duties. For sentencing, he will testify about the impact of the accused's actions on him and the unit.

3. ([redacted]

4. (U) Mr. Maxwell Allen, Central Intelligence Agency, McLean, VA 22101, POC: Ms. Jennifer M., (b) (7)(C) [redacted]. 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.

5. (U) SGT Mary Amiatu, 18th AG Personnel Services Battalion, Fort Bragg, NC 28310, (b) (7)(C) [redacted]. She will testify as to the authenticity of the JAMMS records.

6. (U) SFC Jose Anica, Brigade Modernization Command, Fort Bliss, TX 79916, (b) (7)(C) [redacted] He will testify about the accused's intelligence systems training and the accused's activities at 2/10, including potential classified information.

7. (U) Mr. Peter Artale, 902d MI Group, Fort Meade, MD 20755, (b) (6), (b) (7) [redacted]. 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.

8. (U) SPC Eric Baker, Fort Drum, NY 13602, ([redacted]. He will testify about the accused's activity in his CHU and the accused's activities at 2/10.

9. (b) (7)(C) [redacted]

10. (U) WO1 Kyle Balonek, Headquarters and Headquarters Company (HHC), Headquarters and Headquarters Battalion (HHBN), 10th Mountain Division (LI), Fort Drum, NY 13602, (b) (7)(C) [redacted]. He will testify about the requirements of being a 35F, the accused's duties and work product, including classified information.

11. (b) (6) [redacted]

12. (U) Mr. Joseph M. Benthal, Watertown, NY 13601, (b) (7)(C), (b) (6). He will testify about the requirements for access to government systems at 10th Mountain Division.

13. (U) SA Troy Bettencourt, U.S. Department of Treasury, Washington, DC (b) (6) [redacted]. He will testify about the IA training the accused received, authentication of

[redacted]

[redacted]

[redacted]

multiple pieces of evidence, and the information that the accused leaked to WikiLeaks, including classified information.

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

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

16. (U) SA John Bowen, 3rd MP Group (CID), Ft. Eustis, VA 23604, (b) (6) [redacted]. He is a chain of custody witness.

17. (U) Mr. Steve Buchanan, Intelink, Fort Meade, MD 20755, (b) (6) [redacted]. 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.

18. [redacted]

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

20. (U) ^ CPT Thomas Cherepko, NATO Force Command, Madrid, Spain 28223, (b) (6) [redacted] 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.

21. [redacted]

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

23. [redacted]

[redacted]

[redacted]

[redacted]

24. (b) (6), (b) (7)(C) [redacted]

25. (b) (7)(C) [redacted]

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

27. (U) * PDAS Elizabeth Dibble, Principal Deputy Assistant Secretary, Bureau of Near Eastern Affairs, Department of State, Washington DC 20520, POC: Mr. Jonathan Davis, (202) 647-2227 / Ms. Elizabeth O'Connor, (b) (6) [redacted]. She will testify at sentencing about the impact to Near Eastern Affairs, including classified information.

28. (U) Mr. John Doe, Department of Defense.[4]

29. [redacted]

30. (U) Mr. Jim Downey, Defense Information Systems Agency, Fort Meade, MD 20755, (b) (6) [redacted]. 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. (b) (7)(C) [redacted]

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

34. (U) ^ PDAS John Feeley, Principal Deputy Assistant Secretary, Bureau of Western Hemisphere Affairs, Department of State, Washington DC 20520, POC: Mr. Jonathan Davis, (b) (6) [redacted] / Ms. Elizabeth O'Connor, (b) (6) [redacted] He will testify about the content of the charged cables originating from and sent to the Western Hemisphere on the

---

[redacted]

[4] (U) This witness was not on the previous witness list.

[redacted]

[redacted]

[redacted]

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. (b) (7)(C) [redacted]

36. (U) CPT Matthew Freeburg, Fort Sill, OK 73503, (b) (6) [redacted]. He will testify about the accused's activities while deployed{, as well as his actions as the company commander in response to the Accused's alleged misconduct}. {}

37. (U) ^ CPT Casey (Martin) Fulton, Joint Multinational Readiness Center, Hohenfels Military Community, Germany, APO AE 09173, (b) (6) [redacted]. 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) [redacted]. He is a chain of custody witness.

39. (U) Ms. Shelia Glenn, Fort Meade, MD 20755, (b) (6) [redacted]. She will testify about unclassified contents of the ACIC document in Specification 15 of Charge II.[5] The prosecution does <u>not</u> intend to elicit classified testimony from this witness.

40. (b) (7)(C) [redacted].

41. (U) SA Toni Graham, Hawaii CID Office, Schofield Barracks, HI 96857, (b) (6) [redacted]. She will testify about the law enforcement investigation in Iraq.

42. (U) Mr. Jacob Grant, US Central Command, MacDill AFB, FL 33621, (b) (6) [redacted]58. 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. ((b) (7)(C) [redacted]

[redacted]

[redacted]

[redacted]

(b) (7)(C)

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

46. (U) Mr. Patrick Hoeffel, Intelligent Software Solutions, Inc., Colorado Springs, CO 80919, (b) (6). He will testify about the CIDNE database {and how it appeared at a particular time}, including potentially classified information.

47.

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

49. (U) LT (US Navy) Thomas Hoskins, Booz Allen Hamilton, Colorado Springs, CO 80903, (b) (6). He will testify about the content of charged USCENTCOM documents containing J-5 information, including classified information.

50. (b) (7)(C)

51. (b) (7)(C)

52.

53. (U) Ms. Elisa K. (Rubin) Ivory, 305th Military Intelligence Battalion, US Army Intelligence Center and Center of Excellence, Fort Huachuca, AZ 85613, (b) (6) She will testify concerning requirements of being a 35F.

54. (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.

55. (b) (7)(C)

56. (U) ^ Mr. Mark Johnson, Digital Forensics and Research Branch, Computer Crime Investigative Unit, Quantico, VA 22134, (b) (6). He will testify about his

[redacted]

forensic analysis of the accused's digital media, including classified information concerning the contents of his forensic reports.

57. (U) * AMB Patrick F. Kennedy, Under Secretary for Management, Department of State, Washington DC 20520, POC: Mr. Jonathan Davis, (b) (6) [redacted] [7] / Ms. Elizabeth O'Connor (b) (6) [redacted]. 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.

58. (b) (7)(C) [redacted].

59. (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) [redacted]. 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.

60. (U) Mr. Mark Kitz, Office of the Assistant Secretary of the Army for Acquisition, Logistics, and Technology (ASA(ALT)), Aberdeen Proving Ground, (b) (6) [redacted]. He will testify about the DCGS-A system, including potentially classified information.[6]

61. (U) * AMB Michael Kozak, Senior Adviser, Bureau of Democracy, Rights and Labor, Department of State, Washington DC 20520, POC: Mr. Jonathan Davis, (b) (6) [redacted] / Ms. Elizabeth O'Connor, (b) (6) [redacted] 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 <u>not</u> include PII of any specific individual

62. (U) Mr. Adrian Lamo, Carmichael, CA 95608, (b) (6) [redacted] The United States does <u>not</u> intend to elicit any classified information contained within the digital chat log.

63. [redacted]

64. (U) CW5 Jon Larue, DAMO-AV, Pentagon, Washington, DC 20310, (b) (6) [redacted]. 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) [redacted] He will testify about counterintelligence and the value of information, including classified information concerning the value of government information. {}

---

[6] (U) Mr. Kitz is replacing Mr. Vince McCarron, HQDA G-2, Washington, DC 20310 and is testifying to the same subject matter as Mr. McCarron.

[7] (U) <u>See</u> *supra* note 3.

[redacted]

[redacted]

[redacted]

66. (U) ^ CPT Steven Lim, HQ, 1st Army Division-East, Fort Meade, MD 20755, (b) (6) [redacted]. 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. (b) (7)(C) [redacted]

68. (b) (7)(C) [redacted]

69. (b) (7)(C) [redacted]

70. [redacted]

71. (U) SGT Chad Madaras, Headquarters Headquarters Company, 2d Battalion, 14th Infantry Regiment, 2BCT, 10th Mountain Division (LI), Fort Drum, NY 13602, (b) (6) [redacted] 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.

72. (U) SFC (Ret) Brian Madrid, Buckeye, AZ 85326, (b) (6) [redacted]. He will testify about the accused's training at AIT.

73. (U) Ms. Tamara Mairena, Headquarters, Computer Crime Investigative Unit, Quantico, VA 22134, (b) (6) [redacted]. She is a chain of custody witness.

74. (U) ^ SA Mark Mander, Washington Metro Resident Agency, Computer Crime Investigative Unit, Quantico, VA 22134, (b) (6) [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.

75. (U) SGT Alejandro Marin, 333rd MP Brigade, Uniondale, NY 11553 (currently deployed to Afghanistan), DSN: (b) (6) [redacted] He will testify about the accused's training at AIT.

76. (b) (7)(C) [redacted]

77. (b) (7)(C) [redacted]

78. [redacted]

[redacted]

[redacted]

79. (b) (7)(C)

80.

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

82. (b) (7)(C)

83. (U) ^ COL David Miller, BDE Modernization Command, Ft. Bliss, TX 79918, (b) (6) He will testify about the accused's misconduct and the multiple administrative investigations.

84. (U) Mr. Jason Milliman, TASC, Inc., Charlottesville, VA 22901, (b) (6) . He will testify about the accused's access to DCGS-A, including potentially classified information.

85. (U) DAS James Moore, Deputy Assistant Secretary, Bureau of South and Central Asian Affairs, Department of State, Washington, DC 20520, POC: Mr. Jonathan Davis, (202) (b) (6) / 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, US Central Command, 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. (b) (7)(C)

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) [redacted] / Ms. Elizabeth O'Connor, (b) (6) [redacted]. 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) [redacted] / Ms. Elizabeth O'Connor, (b) (6) [redacted]. He will testify as an OCA that Department of State information was properly classified, including classified information.

92. [redacted]

93. (U) LtCol (Ret) Martin Nehring, US Central Command, MacDill AFB, FL (b) (6) [redacted] He will testify about the content of charged documents containing J3 information, including classified information.

94. (U) CW4 Ronald Nixon, ARCYBER, Fort Belvoir, VA 22060, (b) (6) [redacted]. He will testify about the USF-I GAL.

95. [redacted] (b) (7)(C) [redacted]

96. (b) (7)(C) [redacted].

97. (U) SGT Daniel Padgett, 902d Military Intelligence Group, Fort Leavenworth, KS 66027, (b) (6) [redacted]. 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) [redacted] Ms. Elizabeth O'Connor, (b) (6) [redacted] 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. [redacted]

[redacted]

[redacted]

100. (U) PDAS H. Dean Pittman, Principal Deputy Assistant Secretary, Bureau of International Organization Affairs, Department of State, Washington, DC 20520, POC: Mr. Jonathan Davis, (b) (6) [redacted] Ms. Elizabeth O'Connor, (b) (6) [redacted] 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.

101. (b) (7)(C) [redacted]

102. (b) (7)(C) [redacted]

103. (b) (7)(C) [redacted].

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

105. (b) (7)(C) [redacted]

106. (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) (6) [redacted] Ms. Elizabeth O'Connor, (b) (6) [redacted] 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.

107. [redacted]

108. (b) (7)(C) [redacted].

109. (U) CW4 Armond Rouillard, G33, US Army Network Enterprise Technology Command, Ft. Belvoir, VA 22060, (b) (6) [redacted]. He will testify about {the SIPRNET, what

---

[8] (U) Mr. Pearson was not on the previous witness list.

[9] (U) See *supra* note 3.

[redacted]

[redacted]

[redacted]

software was authorized on the SIPRNET, the USF-I GAL, and} the value of information stolen from the USF-I GAL, including potentially classified information.

110. (U) SGT David Sadtler, 709th MI BN, Harrogate, UK, APO AE 09468, DSN: (b) (6) - [redacted] 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.

111. (U) Mr. Doug Schasteen, Wilco Technologies, Inc., Kansas City, MO 64106 (b) (6) [redacted]. He will testify about the authenticity of the accused's annual Information Awareness training.

112. (U) Ms. Jacqueline Scott, US Central Command, MacDill AFB, (b) (6) [redacted]. She will testify about the response to the FOIA request for the Apache video, including potentially classified material.

113. (U) AMB Stephen Seche, Deputy Assistant Secretary, Bureau of Near Eastern Affairs, Department of State, Washington, DC 20520, POC: Mr. Jonathan Davis (b) (6) [redacted] Ms. Elizabeth O'Connor, (b) (6) [redacted]. 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.

114. (U) ^ SA David Shaver, U.S. Department of Treasury, Washington, DC 20220, (b) (6) - [redacted] 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.

115. (U) ^ Ms. Jihrleah Showman (b) (6) [redacted]. 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

116. (b) (7)(C) [redacted]

117. (U) SA Thomas Smith, US Army CID Command, Fort Gordon, GA 30905, (b) (6) [redacted] He will testify about the investigation in Iraq.

118. (b) (7)(C) [redacted]

[redacted]

[redacted]

[redacted]

119. ([redacted] (b) (6), (b) (7)(C) [redacted]

120. ([redacted] (b) (7)(C) [redacted]

121. [redacted] (b) (7)(C) [redacted]

122. [redacted]

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

124. ([redacted] (b) (6), (b) (7)(C) [redacted]

125. (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, [redacted] (b) (6) / Ms. Elizabeth O'Connor, [redacted] (b) (6) She will testify to the authenticity of all charged Department of State cables, including potentially classified information.

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

127. (U) Mr. Louis Travieso, US Central Command, MacDill AFB, FL 33621, [redacted] (b) (6) He will testify about the content of the charged document(s) containing J-2 information, including classified information.

128. (U) Ms. Debra VanAlstyne, Potomac, MD 20854, [redacted] (b) (6). She is an authentication witness.[10]

129. [redacted] (b) (7)(C) [redacted]

[10] (U) Ms. VanAlstyne was not on the previous witness list.

[redacted]

[redacted]

130. (b) (7)(C) [redacted].

131. (U) Mr. Greg Weaver, Compliance Branch Chief, US Army Cyber Command, Ft. Belvoir, VA 22060, (b) (6) [redacted] He will testify about information assurance.

132. (U) Ms. Florinda White, CERDEC Software Engineering Directorate, Aberdeen Proving Ground, MD 21005, (b) (6) [redacted]. She will testify to the authenticity of DCGS-A documentation{, as well as what is authorized on DCGS-A}.

133. (U) SA John Wilbur, Department of Treasury, Washington, DC (b) (6) [redacted]. He is a chain of custody witness.

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

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

136. (U) Mr. Alex Withers, Brookhaven National Laboratory, Upton, NY (b) (6) [redacted]. He is a chain of custody witness.

137. (U) RADL David Woods, Commander, Strike Force Training Pacific, San Diego, CA 96601, POC: LCDR Todd Kline, (b) (6) [redacted]. He will testify as an OCA that JTF-GTMO information was properly classified, including classified information.

138. (U) AMB Don Yamamoto, Principal Deputy Assistant Secretary, Bureau of African Affairs, Department of State, Washington, DC 20520, POC: Mr. Jonathan Davis, (b) (6) [redacted] / Ms. Elizabeth O'Connor, (b) (6) [redacted]. 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.

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

140. (U) AMB Marie Yovanovitch, Principal Deputy Assistant Secretary, Bureau of European Affairs, Department of State, Washington, DC 20520, POC: Mr. Jonathan Davis, (b) [redacted] / Ms. Elizabeth O'Connor, (b) (6) [redacted]. 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.

[redacted]

141. (U) PDAS Joseph Yun, Principal Deputy Assistant Secretary, Bureau of East Asian Affairs, Department of State, Washington, DC 20520, POC: Mr. Jonathan D(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.

(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 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 on Mr. Cassius Hall, Defense Security Expert, as requested by Mr. David Coombs, Civilian Defense Counsel, via SIPRNET, on 31 January 2013.

ASHDEN FEIN
MAJ, JA
Trial Counsel