UNITED STATES OF AMERICA	)	
	)	
v.	)	**Prosecution Disclosure of**
	)	***Giglio* Material**
Manning, Bradley E.	)	
PFC, U.S. Army,	)	
HHC, U.S. Army Garrison,	)	**12 December 2012**
Joint Base Myer-Henderson Hall	)	
Fort Myer, Virginia 22211	)	

On 22 June 2012, the United States submitted its initial Witness List in the above referenced court-martial. *See* Appellate Exhibit (AE) CLXII. On 15 October 2012, the United States made available to the defense for inspection any discovered impeachment material relating to those witnesses. On 26 October 2012, the United States submitted its updated Witness List. *See* AE CCCLXVII. Beginning shortly thereafter, the United States began requesting any impeachment material for all remaining witnesses whose records had not yet been searched. *See* Enclosure. The United States requested that the departments, agencies, organizations, and military commands, to which government witnesses are employed or assigned, conduct a thorough and comprehensive search of their own records for impeachment material and disclose any responsive records. *See id*; *see also Giglio v. United States*, 405 U.S. 150 (1972). For all remaining witnesses, the United States reviewed records contained within Official Military Personnel Files or the National Crime Information Center database.

As of 12 December 2012, the United States has reviewed its own files and records received in response to its requests. In addition to prior disclosures, the United States discloses the following and makes available for inspection all discoverable material:

1. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

2. Mr. Maxwell Allen. The prosecution did not find any such material relating to this witness.

3. SPC Mary Amiatu. The prosecution did not find any such material relating to this witness.

4. SPC Kyra Amos. The prosecution did not find any such material relating to this witness.

5. Mr. Joseph Benthal. The prosecution did not find any such material relating to this witness.

6. COL Julian Chesnutt. The prosecution did not find any such material relating to this witness.

7. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

8. (b) (6) [redacted] The prosecution did not find any such material relating to this witness.

9. RADM Kevin Donegan. The prosecution did not find any such material relating to this witness.

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10. Mr. Jim Downey. The prosecution did not find any such material relating to this witness.

11. (b) (6) [redacted]. Any material relating to this witness is available for inspection with the prosecution.

12. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

13. CW3 Hondo Hack. The prosecution did not find any such material relating to this witness.

14. Mr. Ben Henwood. The prosecution did not find any such material relating to this witness.

15. Mr. John Hodges. The prosecution did not find any such material relating to this witness.

16. Mr. Patrick Hoeffel. The prosecution did not find any such material relating to this witness.

17. Ms. Mary Horvath. The prosecution did not find any such material relating to this witness.

18. Mr. Matthew Hosburgh. The prosecution did not find any such material relating to this witness.

19. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

20. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

21. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

22. (b) (6) [redacted]. Any material relating to this witness is available for inspection with the prosecution.

23. Mr. Randall MacRobbie. The prosecution did not find any such material relating to this witness.

24. Mr. Brian Madrid. The prosecution did not find any such material relating to this witness.

25. GEN James Mattis. The prosecution did not find any such material relating to this witness.

26. MG Kenneth McKenzie. The prosecution did not find any such material relating to this witness.

27. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

28. Mr. Jason Milliman. Any material relating to this witness is available for inspection with the prosecution.

29. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

30. Mr. Gerald Mundy. The prosecution did not find any such material relating to this witness.

31. MG Michael Nagata. The prosecution did not find any such material relating to this witness.

32. CW4 Ronald Nixon. The prosecution did not find any such material relating to this witness.

33. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

34. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

35. (b) (6) [redacted]. The prosecution did not find any such material relating to this witness.

36. (b) (6), (b) (7)(C) [redacted]. Any material relating to this witness is available for inspection with the prosecution.

37. (b) (6), (b) (7)(C) [redacted]. The prosecution did not find any such material relating to this witness.

38. (b) (6), (b) (7)(C) [redacted] The prosecution did not find any such material relating to this witness.

39. Mr. Doug Schasteen. The prosecution did not find any such material relating to this witness.

40. Ms. Jihrleah Showman. The prosecution did not find any such material relating to this witness.

41. (b) (6), (b) (7)(C) [redacted] The prosecution did not find any such material relating to this witness.

42. (b) (6), (b) (7)(C) [redacted]. The prosecution did not find any such material relating to this witness.

43. Ms. Cathryn Strobl. The prosecution did not find any such material relating to this witness.

44. (b) (6), (b) (7)(C) [redacted]. The prosecution did not find any such material relating to this witness.

45. Mr. Louis Travieso. The prosecution did not find any such material relating to this witness.

46. Ms. Florinda White. The prosecution did not find any such material relating to this witness.

47. AMB Marie Yovanovitch. Any material relating to this witness is available for inspection with the prosecution.

The United States further did not find any such material relating to those government witnesses identified in paragraphs 145-147 of Appellate Exhibit CCCLXVII.

The United States acknowledges its continuing obligation to make available additional impeachment information if it is discovered.

The United States will request impeachment material for its witnesses for any remaining motion hearings and make any responsive material available for inspection.

J. HUNTER WHYTE
CPT, JA
Assistant Trial Counsel

Encl

I certify that I served or caused to be served a true copy of the above on Mr. David Coombs, Civilian Defense Counsel via electronic mail, on 12 December 2012.

J. HUNTER WHYTE
CPT, JA
Assistant Trial Counsel