

UNITED STATES OF AMERICA

v.

Manning, Bradley E.  
PFC, U.S. Army,  
HHC, U.S. Army Garrison,  
Joint Base Myer-Henderson Hall  
Fort Myer, Virginia 22211

STIPULATION OF  
EXPECTED TESTIMONY

Mr. Garon Young

DATED: 30 May 2013

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if Mr. Garon Young were present to testify during the merits and pre-sentencing phases of this court-martial, he would testify substantially as follows:

1. I am currently the Criminal Intelligence Program Manager for the U.S. Army Computer Crime Investigative Unit (CCIU) of the Criminal Investigative Division (CID). I have been with CCIU for 10 years. This position primarily entails reviewing cases for intelligence data and entering them into our database. Additionally, I review reports, serve as the security manager, and act as alternate evidence custodian. I have held this position for 10 years.
2. I have an Associate's degree from Central Texas College and began my law enforcement career in 1980 as a Military Policeman. In 1987 I became a Military Police Investigator. From 1989 to 1992, I was the Chief of Investigations in Wuerzburg, Germany. During this time (1989 – 1991), I was also the evidence custodian. I joined CID in 1993 and from 1994 to 1995 was the alternate evidence custodian while stationed in Korea. From 1995 to 1998, I was the detachment sergeant at Fort Leonard Wood. In this capacity, I was the senior enlisted advisor and primary evidence custodian. From 1998 until I retired in 2000, I worked at CID Headquarters on Fort Belvoir. After 3 years of working for the Florida Department of Revenue, in 2003, I returned to criminal investigations by joining CCIU. I have worked in my current position since then – serving from 2003 to 2006 as the alternate and occasionally primary evidence custodian at various times. Throughout my years in law enforcement, I have worked more than 800 cases.
3. In 1996, I took the Medical Legal Death Investigations Training by the Armed Forces Institute of Pathology held at Fort Lewis. In 2005, I attended the Evidence Management Course at the United States Army Crime Lab in Fort Gillem, GA. And in 2007, I returned to Fort Gillem for the Army Crime Lab's Special Agent Laboratory Training. These courses do cover physical and digital evidence collection and handling.
4. I follow several general procedures when handling evidence as evidence custodian. The first time I receive a piece of evidence I check the accompanying DA Form 4137 evidence custody document to make sure the evidence matches the description and that the marked-for-identification number on the evidence matches what is recorded on the form. I also check to make sure the form has been appropriately filled out. When I sign the evidence into the evidence room, I sign in the "received" column. I then log it in the evidence book and the database before placing it in the evidence room. When someone asks to receive a stored piece of evidence, I pull the voucher number and locate the evidence in its appropriate location. I check to make sure the evidence I am handing over matches the description on the form and then I release it to the

Special Agent or Forensic Examiner who has requested it. I sign that I have released it and the individual receiving it signs that (s)he has received it. Each time I relinquish or assume custody of evidence, I check the description to make sure the evidence being transferred matches the forms used to transfer it.

5. In my capacity as evidence custodian I have worked with SA Kirk Ellis, SA Antonio Edwards, and Ms. Tamara Mairena. When Ms. Mairena came on board as the primary evidence custodian, I trained her. She works as the primary and I as the alternate evidence custodian. It is normal for her to sign evidence out of the evidence room and for me to sign it back in (or vice versa).

6. I am involved in the present case because of my role in assisting the investigation team with the secure storage of the evidence they collect. I have received evidence from both SA Edwards and SA Ellis.

7. On 15 June 2010, I received evidence related to this investigation from SA Edwards. I took custody of a Lenovo Laptop computer with a Fujitsu computer hard drive (serial number: K404T812MF4D), collected from Mr. Adrian Lamo while in Sacramento, CA on 12 June 2010, recorded as Item 1 on a DA Form 4137 marked as document number (DN) 76-10, and known as: "Lamo Ubuntu Harddrive". I also took custody of an HP Mini Brand computer with a Seagate computer hard drive (hard drive serial number: SRE2C1QK), collected from Mr. Adrian Lamo in Carmichael, CA on 12 June 2010, recorded as Item 1 on a DA Form 4137 marked as DN 77-10, and known as "Lamo HP Harddrive". Upon taking possession of this evidence I logged it in to the evidence room using the proper procedures I just described. I never logged it back out.

8. On 15 June 2010, I also received evidence related to this investigation from SA Ellis. I took custody of a DVD (Marked "0028-10-cid221-10117 Dept of State Server Logs, 199.56.188.73"), seized from the Department of State on 15 June 2010, recorded as Item 1 on a DA Form 4137 marked as DN 78-10, and known as "DoS Server Logs". Upon taking possession of this evidence, I logged it into the evidence room using the proper procedures I described earlier. I never logged it back out.



ASHDEN FEIN  
MAJ, JA  
Trial Counsel



THOMAS F. HURLEY  
MAJ, JA  
Defense Counsel



BRADLEY E. MANNING  
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Accused