

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

SA Ronald Rock

9 June 2013

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

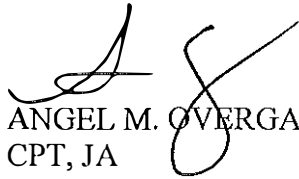
1. I currently work as a Special Agent with the U.S. Department of State (DoS), Diplomatic Security Service (DSS). Prior to becoming a Special Agent with the DSS, I served as a Sergeant on the DSS, Uniformed Division from 1999-2001. There, I provided oversight for over fifty uniformed officers at nine DoS annexes in Washington, D.C. and Maryland. I graduated from the DSS, Basic Special Agent Class in July 2002 where I won the DSS Director's award as the top graduate. Since then, I have served in the DSS Washington Field Office (2002-2004); the Secretary of State's Protective Detail (2004-2006); U.S. Embassy Bogota (Colombia) (2006-2008); the National Defense Intelligence College (2008-2009); the Special Investigations Division (2009-2012). During my three years in the Special Investigations Division (SID), where I was promoted to Acting Branch Chief in charge of supervising seven other special agents, my portfolio included the responsibility for investigating cases of criminal and administrative misconduct by DoS employees, their family members and contractors, as well as employees from other agencies under Chief of Mission authority at U.S. Consulates and Embassies worldwide. I led the investigative effort for DSS on several high profile cases involving the unauthorized disclosure of DoS classified information. Additionally, I drafted the standard operating procedure by which SID currently investigates leaks of DoS classified information.

2. I currently work at the U.S. Consulate in Mazar-e Sharif, Regional Command North, Afghanistan. There, my team and I are responsible for the safety and security of all American diplomats who travel through the nine provinces comprising Northern Afghanistan.

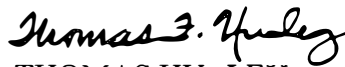
3. In this case, I was involved with the coordination for evidence collection, as well as the actual collection of evidence at the DoS. Specifically, I coordinated with DoS Deputy Chief Information Officer (DCIO) Charlie Wisecarver to obtain a CD containing Department of State SIPRNET firewall log traffic for IP addresses 22.225.41.40 and 22.225.41.22. On 14 October 2010, I visited DCIO Wisecarver in Washington, D.C. and collected a disk containing the firewall logs from the DoS classified system. The disk was a silver CD bearing the markings "Wikileaks DoS Firewall Logs 13 Oct 10." It bore a US Government SECRET sticker. This disk was important to our investigation as the logs showed connections between the DoS NCD database and the IP addresses of the SIPRNET machines assigned to PFC Manning.

4. On 15 October 2010, I signed the CD marked with the words "Wikileaks DoS Firewall Logs 13 October 2010" over to SA John Wilbur. I handled this evidence consistent with procedures as I have been trained. When signing over the evidence, I used a Department of the Army Evidence Property Document (DA Form 4137) with the label DN 151-10 and this CD was item 1 (BATES numbers: 00411151-00411152). While in possession of this evidence, I maintained positive control. I did not alter the information on the CD. I have no reason to believe this evidence was damaged or contaminated in any way. I did not touch this evidence again.


5. **Prosecution Exhibit 68 for Identification** is this CD (DN 151-10, Item 1).



ANGEL M. OVERGAARD
CPT, JA
Assistant Trial Counsel



THOMAS HULEY
MAJ, JA
Defense Counsel



BRADLEY E. MANNING
PFC, USA
Accused