

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 Troy M. Bettencourt**

**DATED: 7 June 2013**


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


1. I am a Special Agent (SA) for the Special Inspector General for the Troubled Asset Relief Program (SIGTARP), U.S. Department of the Treasury. Specifically, I work for the Computer Forensics Unit (CFU), SIGTARP. My current job title is Senior Special Agent (SSA) and I am located in Washington, DC. As an SSA for the CFU, my job primarily entails providing digital forensic and e-Discovery support to SIGTARP's nationwide criminal investigations. I also conduct criminal investigations of crimes within SIGTARP's investigative purview. I have served as a Special Agent for SIGTARP for approximately 1 and a half years.
2. From November 2010 to December 2011, I was a Special Agent for the U.S. Army Criminal Investigation Command (CID). Specifically, I worked for the Computer Crimes Investigation Unit (CCIU). I was assigned to the Washington Metro Resident Agency, CCIU, and investigated crimes within CCIU's investigative purview, with a focus on the PFC Manning investigation.
3. From June 2007 to November 2010, I was an administrator with the Punta Gorda Police Department where I was responsible for accreditation, staff inspections/audits, administrative/management studies, personnel supervision, media relations, and forensic imaging/preliminary analysis of digital evidence in cases ranging from prostitution to homicide.
4. From May 2005 to June 2007, I owned and operated my own business. From October 2001 to May 2005, I was a Special Agent with CCIU. I supervised a team of special agents responsible for investigating crimes within CCIU's investigative purview. I was also assigned as the CID liaison to the U.S. Army Computer Emergency Response Team (ACERT) and the Joint Task Force - Global Network Operations (JTF-GNO).
5. From February 1999 - September 2001, I was a Special Agent with the Hawaii Field Office, CID, where I served as an assistant team chief of a drug suppression team, as well as an investigator on a general crimes investigative team and a child abuse/sexual crimes investigative team.
6. I earned a Masters of Public Administration (Criminal Justice Administration) from Troy University located in Alabama. I have had extensive training in evidence collection and


handling to include, but not limited to, the 17-week Apprentice Special Agents Course. In terms of computers and forensics training, I have completed multiple courses over the years. I completed three courses at the Defense Cyber Investigative Training Academy (DCITA) in Linthicum, Maryland, between the years 2001 and 2011, which covered digital media collection issues. From 2002-2003, I attended two courses at Guidance Software in Reston, Virginia (the manufacturer of EnCase). During this time I also completed four courses at Learning Tree International, which focused on information network security. In 2003, I completed the Federal Law Enforcement Training Center Seized Evidence Recovery Specialist training/certification in Glynco, Georgia. In 2009 and 2013, I attended two courses conducted by AccessData (manufacturer of FTK). In 2012, I completed a training/certification course on use of the Cellebrite Universal Forensic Extraction Device. These courses all discussed the collection, handling, and/or forensic analysis of digital evidence.

7. I earned a Department of Defense Certified Digital Media Collector certificate in 2011 from the Department of Defense Cyber Crime Center (DC3), which must be renewed every two years. I have not renewed it as I no longer work for a Department of Defense entity. I earned the Federal Law Enforcement Training Center Seized Evidence Recovery Specialist certification in 2003, which did not require recertification. I earned the Cellebrite Universal Forensic Extraction Device (UFED) Certification in 2012, which does not require recertification. I also earned the following certifications which have since lapsed: Learning Tree International Network Security Certified Professional (2003); Guidance Software Encase Certified Examiner (2004); AccessData Certified Examiner (2009). In addition to my training and certifications, I have investigated or supervised more than 100 investigations involving computer crime and investigated or supervised between 200-300 criminal investigations unrelated to computer crime.

8. On 30 August 2011, as part of this investigation, I downloaded the "Cablegate" archive from "www.wikileaks.org" based on press reports indicating that all Department of State diplomatic cables in the possession of WikiLeaks had been posted on the WikiLeaks website. The archive I collected contained 251,287 purported Department of State diplomatic cables or messages. The purported cables ranged in date from 1966 to February 2010. I know this because I personally reviewed the "Cablegate" archive after collection. This review of the contents of the archive revealed that no information had been redacted from the files.

  
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CPT, JA  
Assistant Trial Counsel

  
THOMAS F. HURLEY  
MAJ, JA  
Military Defense Counsel

  
BRABLEY E. MANNING  
PFC, USA  
Accused