

IN THE UNITED STATES ARMY
FIRST JUDICIAL CIRCUIT

UNITED STATES)

v.)

MANNING, Bradley E., PFC)

U.S. Army, xxx-xx-9504)

Headquarters and Headquarters Company, U.S.)

Army Garrison, Joint Base Myer-Henderson Hall,)

Fort Myer, VA 22211)

**DEFENSE FORENSIC REQUEST
OF RELEVANT COMPUTERS**

DATED: 26 March 2012

1. The Defense, in consultation with its computer forensic experts, requests the following process be performed in order to facilitate the Court's Order compelling the Government to immediately cause an inspection of 14 hard drives from the Tactical Sensitive Compartmented Information Facility (T-SCIF) and the Tactical Operations Center (TOC) of Headquarters and Headquarters Company (HHC), 2nd Brigade Combat Team (BCT), 10th Mountain Division, Forward Operating Base (FOB) Hammer, Iraq:

a. The Government provides the Court and Defense with a list of the approved programs for the Distributed Common Grounds System – Army (DCGS-A) computer;

b. The Government's forensic experts provide the Defense with an EnCase Folder Structure in .rtf format that includes the filenames within each of the following folders for every identified user profile on each hard drive:

(1) Program Files;

(2) User Profile Storage regarding: Documents, Music, Games, Pictures, Local Settings\Application Data etc.;

(3) Windows\Prefetch

2. The requested process will accurately identify any unauthorized music, movies, games, or other programs. The process will not, however, reveal any content of any file. Thus, the information revealed will not be classified, and will not necessitate a review by any Original Classification Authority (OCA).

3. The above process can easily be completed within a matter of a few days. The process will also eliminate the need for the Government to search each computer for every conceivable form of unauthorized media (music, movies, games and other programs). Moreover, this process avoids the Defense having to guess at what, of the millions of software programs out there, might be found on the relevant computers.

4. The point of contact for this memorandum is the undersigned at [REDACTED]

Respectfully submitted,

DAVID EDWARD COOMBS
Civilian Defense Counsel