

- (U) PRIVACY NOTE: This information is protected health information and is protected under HIPAA, to include HIPAA Privacy Rule. Accordingly, this information is exempt from disclosure pursuant to FOIA or any other request. Furthermore, this information may only be disclosed to authorized persons in the court-martial of <u>United States v. PFC Bradley Manning</u>.
- (U) CLASSIFICATION OF QUESTIONS: The questions listed below are UNCLASSIFIED and subject to the "privacy note" above. On 15 April 2013, Mr. Coombs, Civilian Defense Counsel, notified the Court and United States of the following:

All of these questions were drafted by me, at my office, without the benefit of [the Government's] classified filings. I also did not draft any of these questions based upon any notes from [the Government's] classified filing. Instead, I drafted the questions based upon the acknowledgment that John Doe has memory issues, and the open source reporting about the UBL raid.

## **Memory Issues**

- 1) Please describe the nature of your memory issues
- A: (U//FOUO) I have occasional short-term memory deficiencies. For example, I might forget where I placed my car keys.
- 2) When did you start having memory issues?
- A: (U//FOUO) 2 to 3 years ago.
- 3) How did you realize that you were having memory issues?
- A: (U//FOUO) I developed routine triages not to misplace my wallet and keys.
- 4) What was the cause of your memory issues?
- A: (U//FOUO) I had repetitive TBI, but not major trauma. I had consistent small doses over time.

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5) How do your memory issues impact you?

A: (U//FOUO) They do not impact my life in any discernible way, but requires understanding and triages to work through it.

6) Are you taking any medication for your memory issues? If yes, what medication(s) and for how long?

A: (U//FOUO) No.

7) Were you taking any medication on the date of the UBL raid (2 May 2011)? If yes, what medication(s) and for how long?

A: (U//FOUO) No.

8) Do your memory issues impact your ability to accurately recall the events of the UBL raid? If yes, how so?

A: (U//FOUO) No.

9) Is there anything else that may impact your ability to accurately recall the events of the UBL raid? If yes, please explain in detail.

A: (U//FOUO) No.

## **UBL Raid**

1) When you entered the UBL compound, what was your assigned task?

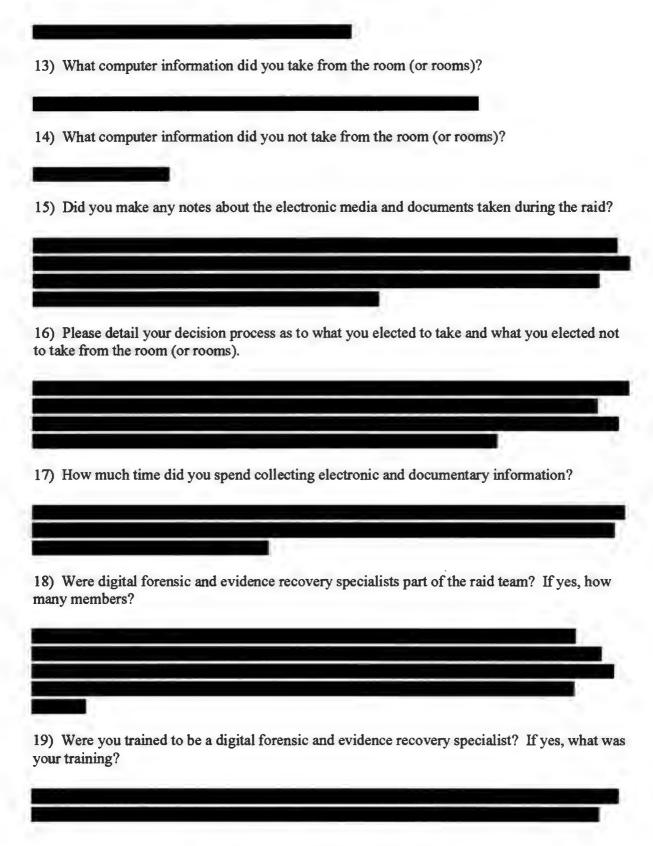
2) How long were you on the ground at the UBL compound?

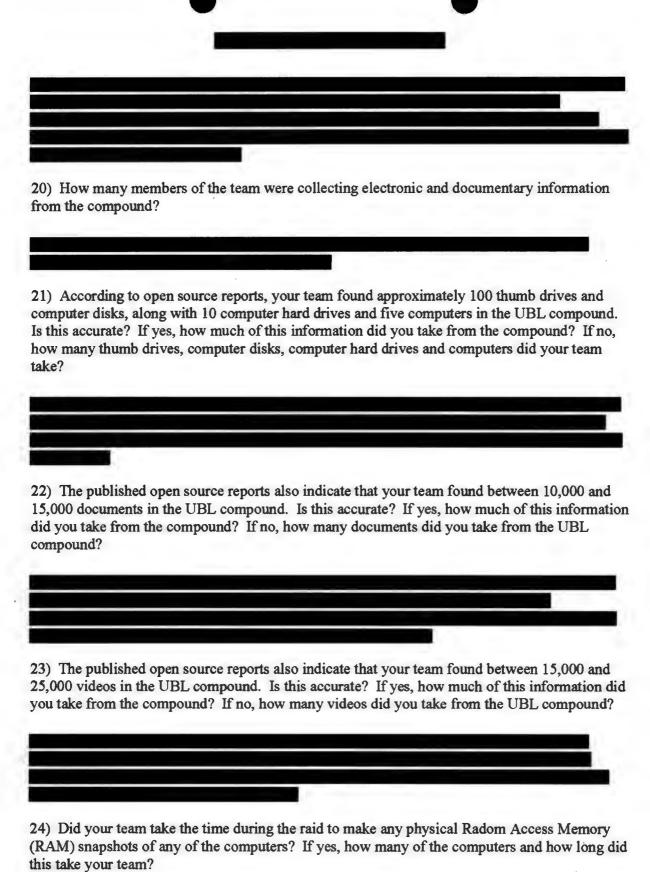
3) How much time transpired from the moment your team entered the compound to the time that you killed UBL?

4) According to open source reporting, the entire raid lasted 38 minutes. At what point during the mission, did you shift your focus from capturing or killing UBL to data recovery such as computers, hard drives, thumb drives, and electronic equipment?

| 5) How much time did you have to find and secure the electronic data before leaving the UBL compound?                               |
|---|
| 6) Where were the items that you found located?   |
| 7) Please describe the room (or rooms) in greater detail, specifically the nature of the computer equipment in the room (or rooms). |
|   |
|   |
| 8) Did the room (or rooms) appear to be being used as a nerve center or a command and control post?                                 |
| 9) Were you the first person in the room (or rooms)? If no, who was?  |
|   |
| 10) Were you the only one securing computer information in the room (or rooms)? If no, who else was securing information?           |
|   |
|   |
| 11) If there were others securing information from the same room (rooms), how many individuals were there?                          |

12) How much electronic media and documents did the other individuals take?





- 25) Did your team transmit any of this information via a very-small-aperture terminal (VSAT) from the compound? If yes, how much time did you spend doing this?
- 26) Other than the room (or rooms) where you recovered information, did any other member of the team find electronic media or documentary information in any other part of the compound? If yes, please explain where the information was found.
- 27) If information was found by other team members in a different location than where you searched, was this information seized? If yes, please explain to the best of your knowledge what was seized by indicating the type of electronic or documentary information and the amount that was seized.
- 28) How did you secure the information that you collected?
- 29) After securing the information, did you give it to anyone before you left the compound? If yes, who did you give it to?
- 30) Please detail how the information was removed from the compound.
- 31) Was the information place on only one of the helicopters from the UBL raid? If no, please detail the number of helicopters that information was placed onto and how much of the information was placed on each helicopter.
- 32) Did you make any notes about the electronic media or documents during the helicopter ride back to Bagram?

33) Did you sleep on the helicopter ride back to Bagram? If yes, how long were you asleep? If yes, where was the electronic media and documentary information while you were asleep? 34) Did you remain with the electronic media and documentary information at all times from the compound to when you returned to Bagram? If no, please explain. 35) Please detail how the electronic media and documentary information that you collected was handled once you returned to Bagram. 36) Did you receive a debriefing upon return to Bagram? 37) Did anything happen before the debriefing? 38) Did the debriefing occur before you transferred custody of the electronic media and documentary information to the FBI? 39) Where was the electronic media and documentary information during the debriefing?

41) If someone other than you had physical control over the electronic media and documentary information before releasing that information to the FBI, did that individual also have physical

40) If the electronic media and documentary information was not with you, who had physical

control over the items?

control over other electronic media and documentary information not associated with the UBL raid?

- 42) Where did you and the other members of your team place the electronic media and documentary information that you collected from the UBL compound when you were being debriefed?
- 43) Is it true that, you and the other members of your team threw all of your bags down that contained the electronic media and documentary information when you arrived at Bagram, went to another area to get debriefed, and then came back to retrieve the bags that contained the electronic media and documentary information? If yes, who watched the electronic media and documentary information while you and your team were being debriefed?
- 44) Was the electronic media and documentary information that you collected ever out of your possession or sight before releasing it to the FBI? If yes, why and for how long?
- 45) Was the electronic media and documentary information that you collected ever mingled with other information and evidence prior to being cataloged by the FBI? If yes, what was the other information and where was it from?

46) After releasing the information to the FBI, did you ever have any other involvement with the electronic media or documentary information that you collected?