

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (FIRST)
)	
v.)	Before Panel No. 3
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	18 February 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(1) and (2) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 60 days, which will end on **8 May 2025**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 41 days have elapsed. On the date requested, 120 days will have elapsed.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[Redacted signature block]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted address block]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 18 February 2025.

Respectfully submitted,

A large black rectangular redaction box covering the signature area.

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

Five horizontal black rectangular redaction bars of varying lengths, covering contact information such as phone numbers and email addresses.

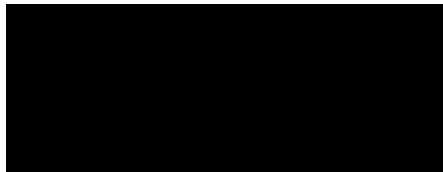
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Senior Airman (E-4))	ACM 40744
JAYSON GONZAGA, USAF,)	
<i>Appellant.</i>)	Panel No. 3
)	

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignments of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

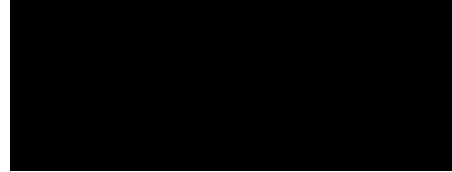


THOMAS J. ALFORD, Lt Col, USAFR
Appellate Government Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 20 February 2025.



THOMAS J. ALFORD, Lt Col, USAFR
Appellate Government Counsel



**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES <i>Appellee</i>)	No. ACM 40744
)	
v.)	
)	ORDER
Jayson GONZAGA Senior Airman (E-4) U.S. Air Force <i>Appellant</i>)	
)	Panel 3

On 18 February 2025, counsel for Appellant submitted a Motion for Enlargement of Time (First), requesting an additional 60 days in which to file Appellant’s assignments of error. The Government opposes the motion.

The court has considered Appellant’s motion, the Government’s opposition, case law, and this court’s Rules of Practice and Procedure.

Accordingly, it is by the court on this 21st day of February, 2025,

ORDERED:

Appellant’s Motion for Enlargement of Time (First) is **GRANTED**. Appellant shall file any assignments of error not later than **8 May 2025**.

Appellant’s counsel is advised that any subsequent motions for enlargement of time shall include, in addition to matters required under this court’s Rules of Practice and Procedure, statements as to: (1) whether Appellant was advised of Appellant’s right to a timely appeal, (2) whether Appellant was provided an update of the status of counsel’s progress on Appellant’s case, (3) whether Appellant was advised of the request for an enlargement of time, and (4) whether Appellant agrees with the request for an enlargement of time.



FOR THE COURT



OLGA STANFORD, Capt, USAF
Chief Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	MOTION FOR ENLARGEMENT OF
<i>Appellee</i>)	TIME (SECOND)
)	
v.)	Before Panel No. 3
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	30 April 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **7 June 2025**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 112 days have elapsed. On the date requested, 150 days will have elapsed.

On 18 September 2024, Appellant was tried before a Military Judge sitting as a general court-martial at Creech Air Force Base, Nevada. Record of Trial (ROT), Vol. 1, Entry of Judgment, dated 22 October 2024. Appellant was charged with one charge with one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ); one charge with two specifications viewing and possessing child pornography in violation of Article 134, UCMJ; and one additional charge with one specification of producing child pornography in violation of Article 134. *Id.* Contrary to his pleas, Appellant was found guilty of the lesser included offense of absence without leave for Charge I and its Specification; Charge II and its Specification; and the Additional Charge and its Specification. Record (R.) at 392. The military



GRANTED
5 MAY 2025

judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, and confined for 14 years and 30 days¹. R. at 490.

The Convening Authority took no action on the findings or the sentence. ROT, Convening Authority Decision on Action – *United States v. SrA Jayson G. Gonzaga*, dated 15 Oct 2024.

The electronic ROT is 1 volume and consists of 24 Prosecution Exhibits, 1 Defense Exhibit, 36 Appellate Exhibits, and 5 Court Exhibits; the transcript is 490 pages. Appellant is currently confined.

Through no fault of Appellant, undersigned counsel has been unable to complete her review and prepare a brief for Appellant’s case. An enlargement of time is necessary to allow counsel to fully review Appellant’s case and advise Appellant regarding potential errors. Appellant was advised on his right to a timely appeal, was provided an update of the status of counsel’s progress on Appellant’s case, was consulted with regard to enlargements of time, and agrees with necessary requests for enlargements of time, including this request.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[Redacted signature]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted address]

¹ For the lesser included offence to Charge I and its Specification, Appellant was sentenced to 30 days confinement. For Charge II and its Specification, Appellant was sentenced to 5 years confinement. For the Additional Charge and its Specification, Appellant was sentenced to 14 years confinement. Confinement for all Specifications is to run concurrently.

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 30 April 2025.

Respectfully submitted,

[Redacted Signature]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted Address]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
)	Before Panel No. 3
Senior Airman (E-4))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force,)	
<i>Appellant.</i>)	
)	2 May 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignments of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

[Redacted Signature Block]

JOCELYN Q. WRIGHT, Maj, USAF
Appellate Government Counsel

[Redacted Address Block]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 2 May 2025.



JOCELYN Q. WRIGHT, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES <i>Appellee</i>)	MOTION FOR ENLARGEMENT OF TIME (THIRD)
)	
v.)	Before Panel No. 2
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	29 May 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **7 July 2025**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 141 days have elapsed. On the date requested, 180 days will have elapsed.

On 18 September 2024, Appellant was tried before a Military Judge sitting as a general court-martial at Creech Air Force Base, Nevada. Record of Trial (ROT), Vol. 1, Entry of Judgment, dated 22 October 2024. Appellant was charged with one charge with one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ); one charge with two specifications viewing and possessing child pornography in violation of Article 134, UCMJ; and one additional charge with one specification of producing child pornography in violation of Article 134. *Id.* Contrary to his pleas, Appellant was found guilty of the lesser offense of absence without leave for Charge I and its Specification; Charge II and its Specification; and the Additional Charge and its Specification. Record (R.) at 392. The military



GRANTED
2 JUN 2025

judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, and confined for 14 years and 30 days¹. R. at 490.

The Convening Authority took no action on the findings or the sentence. ROT, Convening Authority Decision on Action – *United States v. SrA Jayson G. Gonzaga*, dated 15 Oct 2024.

The electronic ROT is 1 volume and consists of 24 Prosecution Exhibits, 1 Defense Exhibit, 36 Appellate Exhibits, and 5 Court Exhibits; the transcript is 490 pages. Appellant is currently confined.

Through no fault of Appellant, undersigned counsel has been unable to complete her review and prepare a brief for Appellant’s case. An enlargement of time is necessary to allow counsel to fully review Appellant’s case and advise Appellant regarding potential errors. Appellant was advised on his right to a timely appeal, was provided an update of the status of counsel’s progress on Appellant’s case, was consulted with regard to enlargements of time, and agrees with necessary requests for enlargements of time, including this request.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[Redacted signature block]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted address block]

¹ For the lesser included offence to Charge I and its Specification, Appellant was sentenced to 30 days confinement. For Charge II and its Specification, Appellant was sentenced to 5 years confinement. For the Additional Charge and its Specification, Appellant was sentenced to 14 years confinement. Confinement for all Specifications is to run concurrently.

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 29 May 2025.

Respectfully submitted,

[Redacted Signature]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted Address]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
)	Before Panel No. 2
Senior Airman (E-4))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force,)	
<i>Appellant.</i>)	
)	2 June 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignments of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

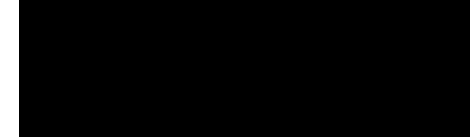
[Redacted Signature]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[Redacted Address]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 2 June 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	MOTION FOR ENLARGEMENT
<i>Appellee</i>)	OF TIME (FOURTH)
)	
v.)	Before Panel No. 2
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	27 June 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **6 August 2025**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 170 days have elapsed. On the date requested, 210 days will have elapsed.

On 18 September 2024, Appellant was tried before a Military Judge sitting as a general court-martial at Creech Air Force Base, Nevada. Record of Trial (ROT), Vol. 1, Entry of Judgment, dated 22 October 2024. Appellant was charged with one charge with one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ); one charge with two specifications viewing and possessing child pornography in violation of Article 134, UCMJ; and one additional charge with one specification of producing child pornography in violation of Article 134. *Id.* Contrary to his pleas, Appellant was found guilty of the lesser offense of absence without leave for Charge I and its Specification; Charge II and its Specification; and the Additional Charge and its Specification. Record (R.) at 392. The military



GRANTED

2 JULY 2025

judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, and confined for 14 years and 30 days¹. R. at 490.

The Convening Authority took no action on the findings or the sentence. ROT, Convening Authority Decision on Action – *United States v. SrA Jayson G. Gonzaga*, dated 15 Oct 2024.

The electronic ROT is 1 volume and consists of 24 Prosecution Exhibits, 1 Defense Exhibit, 36 Appellate Exhibits, and 5 Court Exhibits; the transcript is 490 pages. Appellant is currently confined.

The undersigned counsel is currently assigned 27 cases; 18 cases are pending before this Court (18 cases are pending AOE). To date, eleven cases have priority over the present case.

1. *United States v. Griffin*, No ACM 40641 – The ROT is 6 volumes and consists of 24 Prosecution Exhibits, 29 Defense Exhibits, 30 Appellate Exhibits, and 1 Court Exhibits; the transcript is 605 pages. Appellant is currently confined. Counsel has begun, but not completed, her review of the record of trial.

2. *United States v. Hooker*, No. ACM 40646 – The electronic ROT is 1 volume and consists of 4 Prosecution Exhibits, 16 Defense Exhibits, and 32 Appellate Exhibits; the transcript is 683 pages. Appellant is currently confined.

3. *United States v. Roedel*, No. ACM 40662 – The electronic ROT is 1 volume and consists of 4 Prosecution Exhibits, 16 Defense Exhibits, and 32 Appellate Exhibits; the transcript is 683 pages. Appellant is currently confined.

¹ For the lesser included offence to Charge I and its Specification, Appellant was sentenced to 30 days confinement. For Charge II and its Specification, Appellant was sentenced to 5 years confinement. For the Additional Charge and its Specification, Appellant was sentenced to 14 years confinement. Confinement for all Specifications is to run concurrently.

4. *United States v. Coley*, No. ACM 40675 – The electronic record of trial is 1 volume and consists of 13 Prosecution Exhibits, 1 Defense Exhibit, and 17 Appellate Exhibits; the transcript is 124 pages. Appellant is currently confined.

5. *United States v. Nesbitt*, No. ACM 40679 - The electronic ROT is 6 volumes and consists of 6 Prosecution Exhibits, 0 Defense Exhibits, 65 Appellate Exhibits, and 2 Court Exhibits; the transcript is 373 pages. Appellant is currently confined.

6. *United States v. Osorno*, No. ACM S32792 - The ROT is 2 volumes and consists of 3 Prosecution Exhibits, 4 Defense Exhibits, and 9 Appellate Exhibits; the transcript is 81 pages. Appellant is not currently confined.

7. *United States v. Szabo*, No. ACM 40590 - The ROT is 12 volume and consists of 7 Prosecution Exhibits, 35 Defense Exhibits, and 121 Appellate Exhibits; the transcript is 1495 pages. Appellant is not currently confined.

8. *United States v. Hughes*, No. ACM 24066 - The electronic ROT is 1 volume and consists of 6 Prosecution Exhibits, 8 Defense Exhibits, and 12 Appellate Exhibits; the transcript is 172 pages. Appellant is not currently confined.

9. *United States v. Lucas*, No. ACM 40702 - The electronic ROT is 5 volumes and consists of 11 Prosecution Exhibits, 3 Defense Exhibits, and 16 Appellate Exhibits; the transcript is 187 pages. Appellant is not currently confined.

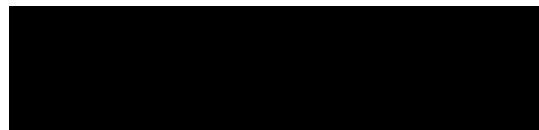
10. *United States v. Lumm*, No. ACM 40752 - The electronic record of trial is 1 volume and consists of 4 Prosecution Exhibits, 14 Defense Exhibits, 7 Appellate Exhibits, and 1 Court Exhibit; the transcript is 111 pages. Appellant is not currently confined.

11. *United States v. Anderson*, No. ACM 40752 – The electronic record of trial is 2 volumes and consists of 9 Prosecution Exhibits, 9 Defense Exhibits, 87 Appellate Exhibits, and 1 Court Exhibit; the transcript is 1112 pages. Appellant is currently confined.

Through no fault of Appellant, undersigned counsel has been unable to complete her review and prepare a brief for Appellant’s case. An enlargement of time is necessary to allow counsel to fully review Appellant’s case and advise Appellant regarding potential errors. Appellant was advised on his right to a timely appeal, was provided an update of the status of counsel’s progress on Appellant’s case, was consulted with regard to enlargements of time, and agrees with necessary requests for enlargements of time, including this request.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,



JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 27 June 2025.

Respectfully submitted,

[REDACTED]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
)	Before Panel No. 2
Senior Airman (E-4))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force,)	
<i>Appellant.</i>)	
)	1 July 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignments of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

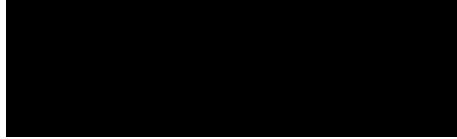
[Redacted Signature]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[Redacted Address]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 1 July 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES <i>Appellee</i>)	MOTION FOR ENLARGEMENT OF TIME (FIFTH)
)	
v.)	Before Panel No. 2
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	28 July 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **5 September 2025**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 201 days have elapsed. On the date requested, 240 days will have elapsed.

On 18 September 2024, Appellant was tried before a Military Judge sitting as a general court-martial at Creech Air Force Base, Nevada. Record of Trial (ROT), Vol. 1, Entry of Judgment, dated 22 October 2024. Appellant was charged with one charge with one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ); one charge with two specifications viewing and possessing child pornography in violation of Article 134, UCMJ; and one additional charge with one specification of producing child pornography in violation of Article 134. *Id.* Contrary to his pleas, Appellant was found guilty of the lesser

use of absence without leave for Charge I and its Specification; Charge II and its and the Additional Charge and its Specification. Record (R.) at 392. The military



GRANTED
30 JULY 2025

judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, and confined for 14 years and 30 days¹. R. at 490.

The Convening Authority took no action on the findings or the sentence. ROT, Convening Authority Decision on Action – *United States v. SrA Jayson G. Gonzaga*, dated 15 Oct 2024.

The electronic ROT is 1 volume and consists of 24 Prosecution Exhibits, 1 Defense Exhibit, 36 Appellate Exhibits, and 5 Court Exhibits; the transcript is 490 pages. Appellant is currently confined.

The undersigned counsel is currently assigned 27 cases; 18 cases are pending before this Court (18 cases are pending AOE). To date, one case before the Court of Appeals for the Armed Forces take priority over this case: *United States v. Menard*. The Court of Appeals for the Armed Forces has ordered the brief be filed no later than 18 August 25.

To date, nine cases at this Court have priority over the present case:

1. *United States v. Griffin*, No ACM 40641 – The ROT is 6 volumes and consists of 24 Prosecution Exhibits, 29 Defense Exhibits, 30 Appellate Exhibits, and 1 Court Exhibits; the transcript is 605 pages. Appellant is currently confined. Counsel is finalizing the AOE.

2. *United States v. Roedel*, No. ACM 40662 – The electronic ROT is 1 volume and consists of 4 Prosecution Exhibits, 16 Defense Exhibits, and 32 Appellate Exhibits; the transcript is 683 pages. Appellant is currently confined.

3. *United States v. Coley*, No. ACM 40675 – The electronic record of trial is 1 volume and consists of 13 Prosecution Exhibits, 1 Defense Exhibit, and 17 Appellate Exhibits; the transcript is 124 pages. Appellant is currently confined.

¹ For the lesser included offence to Charge I and its Specification, Appellant was sentenced to 30 days confinement. For Charge II and its Specification, Appellant was sentenced to 5 years confinement. For the Additional Charge and its Specification, Appellant was sentenced to 14 years confinement. Confinement for all Specifications is to run concurrently.

4. *United States v. Nesbitt*, No. ACM 40679 - The electronic ROT is 6 volumes and consists of 6 Prosecution Exhibits, 0 Defense Exhibits, 65 Appellate Exhibits, and 2 Court Exhibits; the transcript is 373 pages. Appellant is currently confined.

5. *United States v. Szabo*, No. ACM 40590 - The ROT is 12 volume and consists of 7 Prosecution Exhibits, 35 Defense Exhibits, and 121 Appellate Exhibits; the transcript is 1495 pages. Appellant is not currently confined.

6. *United States v. Hughes*, No. ACM 24066 - The electronic ROT is 1 volume and consists of 6 Prosecution Exhibits, 8 Defense Exhibits, and 12 Appellate Exhibits; the transcript is 172 pages. Appellant is not currently confined.

7. *United States v. Lucas*, No. ACM 40702 - The electronic ROT is 5 volumes and consists of 11 Prosecution Exhibits, 3 Defense Exhibits, and 16 Appellate Exhibits; the transcript is 187 pages. Appellant is not currently confined.

8. *United States v. Lumm*, No. ACM 40752 - The electronic record of trial is 1 volume and consists of 4 Prosecution Exhibits, 14 Defense Exhibits, 7 Appellate Exhibits, and 1 Court Exhibit; the transcript is 111 pages. Appellant is not currently confined.

9. *United States v. Anderson*, No. ACM 40752 – The electronic record of trial is 2 volumes and consists of 9 Prosecution Exhibits, 9 Defense Exhibits, 87 Appellate Exhibits, and 1 Court Exhibit; the transcript is 1112 pages. Appellant is currently confined.

Through no fault of Appellant, undersigned counsel has been unable to complete her review and prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise Appellant regarding potential errors. Appellant was advised on his right to a timely appeal, was provided an update of the status of

counsel's progress on Appellant's case, was consulted with regard to enlargements of time, and agrees with necessary requests for enlargements of time, including this request.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[Redacted signature block]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted address block]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 28 July 2025.

Respectfully submitted,

[Redacted signature block]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted contact information]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
)	Before Panel No. 2
Senior Airman (E-4))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force,)	
<i>Appellant.</i>)	
)	29 July 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignments of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

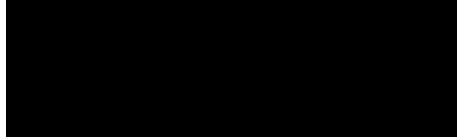
[Redacted Signature]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[Redacted Address]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 29 July 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES <i>Appellee</i>)	MOTION FOR ENLARGEMENT OF TIME (SIXTH)
)	
v.)	Before Panel No. 3
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	26 August 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **5 October 2025**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 230 days have elapsed. On the date requested, 270 days will have elapsed.

On 18 September 2024, Appellant was tried before a Military Judge sitting as a general court-martial at Creech Air Force Base, Nevada. Record of Trial (ROT), Vol. 1, Entry of Judgment, dated 22 October 2024. Appellant was charged with one charge with one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ); one charge with two specifications viewing and possessing child pornography in violation of Article 134, UCMJ; and one additional charge with one specification of producing child pornography in violation of Article 134. *Id.* Contrary to his pleas, Appellant was found guilty of the lesser included offense of absence without leave for Charge I and its Specification; Charge II and its Specification; and the Additional Charge and its Specification. Record (R.) at 392. The military



GRANTED
2 SEP 2025

judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, and confined for 14 years and 30 days¹. R. at 490.

The Convening Authority took no action on the findings or the sentence. ROT, Convening Authority Decision on Action – *United States v. SrA Jayson G. Gonzaga*, dated 15 Oct 2024.

The electronic ROT is 1 volume and consists of 24 Prosecution Exhibits, 1 Defense Exhibit, 36 Appellate Exhibits, 5 Court Exhibits. The total length of the ROT is 1706 pages; the transcript is 490 pages. Appellant is currently confined. Counsel has not yet reviewed the record of trial in this case.

The undersigned counsel is currently assigned 29 cases; 21 cases are pending before this Court (16 cases are pending AOE). To date, seven cases at this Court have priority over the present case:

1. *United States v. Roedel*, No. ACM 40662 – The electronic ROT is 1 volume and consists of 4 Prosecution Exhibits, 16 Defense Exhibits, and 32 Appellate Exhibits; the transcript is 65 pages. Appellant is currently confined. Counsel has begun drafting the AOE in this case.

2. *United States v. Coley*, No. ACM 40675 – The electronic record of trial is 1 volume and consists of 13 Prosecution Exhibits, 1 Defense Exhibit, and 17 Appellate Exhibits; the transcript is 124 pages. Appellant is currently confined. Counsel has begun, but not completed her review of the ROT.

3. *United States v. Nesbitt*, No. ACM 40679 - The electronic ROT is 6 volumes and consists of 6 Prosecution Exhibits, 0 Defense Exhibits, 65 Appellate Exhibits, and 2 Court

¹ For the lesser included offence to Charge I and its Specification, Appellant was sentenced to 30 days confinement. For Charge II and its Specification, Appellant was sentenced to 5 years confinement. For the Additional Charge and its Specification, Appellant was sentenced to 14 years confinement. Confinement for all Specifications is to run concurrently.

Exhibits; the transcript is 373 pages. Appellant is currently confined. Counsel has not yet reviewed the ROT in this case.

4. *United States v. Szabo*, No. ACM 40590 - The ROT is 12 volume and consists of 7 Prosecution Exhibits, 35 Defense Exhibits, and 121 Appellate Exhibits; the transcript is 1495 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.

5. *United States v. Lucas*, No. ACM 40702 - The electronic ROT is 5 volumes and consists of 11 Prosecution Exhibits, 3 Defense Exhibits, and 16 Appellate Exhibits; the transcript is 187 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.

6. *United States v. Kelly*, No. ACM 40710 - The electronic ROT is 1 volume and consists of 6 Prosecution Exhibits, 8 Defense Exhibits, and 12 Appellate Exhibits; the transcript is 172 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.

7. *United States v. Lumm*, No. ACM 40752 - The electronic record of trial is 1 volume and consists of 4 Prosecution Exhibits, 14 Defense Exhibits, 7 Appellate Exhibits, and 1 Court Exhibit; the transcript is 111 pages. Appellant is not currently confined. Counsel has not yet reviewed the record of trial in this case. Counsel has not yet reviewed the ROT in this case.

Through no fault of Appellant, undersigned counsel has been unable to complete her review and prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise Appellant regarding potential errors. Appellant was advised on his right to a timely appeal, was provided an update of the status of counsel's progress on Appellant's case, was consulted with regard to enlargements of time, and agrees with necessary requests for enlargements of time, including this request.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[Redacted]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 26 August 2025.

Respectfully submitted,

[REDACTED]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
)	Before Panel No. 3
Senior Airman (E-4))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force,)	
<i>Appellant.</i>)	
)	28 August 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its general opposition to Appellant's Motion for Enlargement of Time to file an Assignments of Error in this case.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

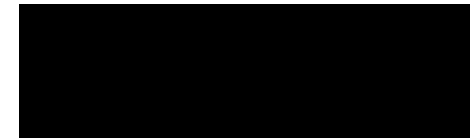
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VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[Redacted contact information]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 28 August 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES <i>Appellee</i>)	MOTION FOR ENLARGEMENT OF TIME (SEVENTH) OOT¹
)	
v.)	Before Panel No. 3
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	1 October 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **4 November 2025**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 266 days have elapsed. On the date requested, 300 days will have elapsed.

On 18 September 2024, Appellant was tried before a Military Judge sitting as a general court-martial at Creech Air Force Base, Nevada. Record of Trial (ROT), Vol. 1, Entry of Judgment, dated 22 October 2024. Appellant was charged with one charge with one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ); one charge with two specifications viewing and possessing child pornography in violation of Article 134, UCMJ; and one additional charge with one specification of producing child pornography in violation of Article 134. *Id.* Contrary to his pleas, Appellant was found guilty of the lesser included offense of absence without leave for Charge I and its Specification; Charge II and its

¹ Due to an inadvertent calendaring error, this motion was submitted out of time. This oversight was not due to bad faith, and upon discovering the discrepancy in dates, counsel took immediate action to correct the error. Appellant bears no responsibility for this delay.

Specification; and the Additional Charge and its Specification. Record (R.) at 392. The military judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, and confined for 14 years and 30 days.² R. at 490.

The Convening Authority took no action on the findings or the sentence. ROT, Convening Authority Decision on Action – *United States v. SrA Jayson G. Gonzaga*, dated 15 Oct 2024.

The electronic ROT is 1 volume and consists of 24 Prosecution Exhibits, 1 Defense Exhibit, 36 Appellate Exhibits, 5 Court Exhibits. The total length of the electronic ROT is 1706 pages; the transcript is 490 pages. Appellant is currently confined. Counsel has not yet reviewed the ROT in this case.

The undersigned counsel is currently assigned 29 cases; 21 cases are pending before this Court (15 cases are pending AOE). To date, one case before the Court of Appeals for the Armed Forces has priority over the present case: *United States v. Menard*, the reply brief is due on 7 October 2025. To date, five cases at this Court have priority over the present case:

1. *United States v. Nesbitt*, No. ACM 40679 - The electronic ROT is 6 volumes and consists of 6 Prosecution Exhibits, 0 Defense Exhibits, 65 Appellate Exhibits, and 2 Court Exhibits; the transcript is 373 pages. Appellant is currently confined. Counsel has not yet reviewed the ROT in this case.
2. *United States v. Szabo*, No. ACM 40590 - The ROT is 12 volume and consists of 7 Prosecution Exhibits, 35 Defense Exhibits, and 121 Appellate Exhibits; the transcript is

² For the lesser included offence to Charge I and its Specification, Appellant was sentenced to 30 days confinement. For Charge II and its Specification, Appellant was sentenced to 5 years confinement. For the Additional Charge and its Specification, Appellant was sentenced to 14 years confinement. Confinement for Charge II and the Additional Charge are to run concurrently. Confinement for Charge I is to run consecutively with Charge II and the Additional Charge.

1495 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.

3. *United States v. Lucas*, No. ACM 40702 - The electronic ROT is 5 volumes and consists of 11 Prosecution Exhibits, 3 Defense Exhibits, and 16 Appellate Exhibits; the transcript is 187 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.
4. *United States v. Kelly*, No. ACM 40710 - The electronic ROT is 1 volume and consists of 6 Prosecution Exhibits, 8 Defense Exhibits, and 12 Appellate Exhibits; the transcript is 172 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.
5. *United States v. Lumm*, No. ACM 40752 - The electronic record of trial is 1 volume and consists of 4 Prosecution Exhibits, 14 Defense Exhibits, 7 Appellate Exhibits, and 1 Court Exhibit; the transcript is 111 pages. Appellant is not currently confined. Counsel has not yet reviewed the record of trial in this case. Counsel has not yet reviewed the ROT in this case.

Through no fault of Appellant, undersigned counsel has been unable to complete her review and prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise Appellant regarding potential errors. Appellant was advised on his right to a timely appeal, was provided an update of the status of counsel's progress on Appellant's case, was consulted with regard to enlargements of time, and agrees with necessary requests for enlargements of time, including this request.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[REDACTED]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 1 October 2025.

Respectfully submitted,

[REDACTED]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
<i>Appellee,</i>)	OPPOSITION TO APPELLANT’S
)	MOTION FOR ENLARGEMENT
)	OF TIME
v.)	
)	
)	Before Panel No. 3
Senior Airman (E-4))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force,)	
<i>Appellant.</i>)	
)	3 October 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court’s Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant’s Motion for Enlargement of Time to file an Assignments of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant nearly a year to submit an assignment of error to this Court. If Appellant’s new delay request is granted, the defense delay in this case will be 300 days in length. Appellant’s nearly year long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court’s appellate processing standards. Appellant has already consumed almost two thirds of the 18 month standard for this Court to issue a decision, which only leaves about 8 month combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant’s counsel has not completed review of the record of trial at this late stage of the appellate process.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

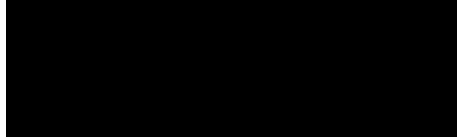


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 3 October 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM 40744
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Jayson Gonzaga)	
Senior Airman (E-4))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 3

On 1 October 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Seventh) Out of Time, requesting an additional 30 days to submit Appellant’s assignments of error. The Government opposes the motion.

The court has considered Appellant’s motion, the Government’s opposition, prior filings in this case, case law, and this court’s Rules of Practice and Procedure.

Accordingly, it is by the court on this 6th day of October 2025,

ORDERED:

Appellant’s Motion for Enlargement of Time (Seventh) Out of Time is **GRANTED**. Appellant shall file any assignments of error not later than **4 November 2025**.

Further requests by Appellant for enlargements of time may necessitate a status conference.



FOR THE COURT

[Redacted signature block]

JACOB B. HOEFERKAMP, Capt, USAF
Chief Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES <i>Appellee</i>)	MOTION FOR ENLARGEMENT OF TIME (EIGHTH)
)	
v.)	Before Panel No. 3
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	27 October 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **4 December 2025**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 292 days have elapsed. On the date requested, 330 days will have elapsed.

On 18 September 2024, Appellant was tried before a Military Judge sitting as a general court-martial at Creech Air Force Base, Nevada. Record of Trial (ROT), Vol. 1, Entry of Judgment, dated 22 October 2024. Appellant was charged with one charge with one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ); one charge with two specifications viewing and possessing child pornography in violation of Article 134, UCMJ; and one additional charge with one specification of producing child pornography in violation of Article 134. *Id.* Contrary to his pleas, Appellant was found guilty of the lesser included offense of absence without leave for Charge I and its Specification; Charge II and its Specification; and the Additional Charge and its Specification. Record (R.) at 392. The military



GRANTED
3 Nov 2025

judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, and confined for 14 years and 30 days.¹ R. at 490.

The Convening Authority took no action on the findings or the sentence. ROT, Convening Authority Decision on Action – *United States v. SrA Jayson G. Gonzaga*, dated 15 Oct 2024.

The electronic ROT is 1 volume and consists of 24 Prosecution Exhibits, 1 Defense Exhibit, 36 Appellate Exhibits, 5 Court Exhibits. The total length of the electronic ROT is 1706 pages; the transcript is 490 pages. Appellant is currently confined. Counsel has not yet reviewed the ROT in this case.

The undersigned counsel is currently assigned 29 cases; 21 cases are pending before this Court (16 cases are pending AOE). To date, 5 cases at this Court have priority over the present case:

1. *United States v. Nesbitt*, No. ACM 40679 - The electronic ROT is 6 volumes and consists of 6 Prosecution Exhibits, 0 Defense Exhibits, 65 Appellate Exhibits, and 2 Court Exhibits; the transcript is 373 pages. Appellant is not currently confined. Counsel is reviewing the ROT in this case.
2. *United States v. Szabo*, No. ACM 40590 - The ROT is 12 volume and consists of 7 Prosecution Exhibits, 35 Defense Exhibits, and 121 Appellate Exhibits; the transcript is 1495 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.

¹ For the lesser included offence to Charge I and its Specification, Appellant was sentenced to 30 days confinement. For Charge II and its Specification, Appellant was sentenced to 5 years confinement. For the Additional Charge and its Specification, Appellant was sentenced to 14 years confinement. Confinement for Charge II and the Additional Charge are to run concurrently. Confinement for Charge I is to run consecutively with Charge II and the Additional Charge.

3. *United States v. Lucas*, No. ACM 40702 - The electronic ROT is 5 volumes and consists of 11 Prosecution Exhibits, 3 Defense Exhibits, and 16 Appellate Exhibits; the transcript is 187 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.
4. *United States v. Kelly*, No. ACM 40710 - The electronic ROT is 1 volume and consists of 6 Prosecution Exhibits, 8 Defense Exhibits, and 12 Appellate Exhibits; the transcript is 172 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.
5. *United States v. Lumm*, No. ACM 40752 - The electronic record of trial is 1 volume and consists of 4 Prosecution Exhibits, 14 Defense Exhibits, 7 Appellate Exhibits, and 1 Court Exhibit; the transcript is 111 pages. Appellant is not currently confined. Counsel has not yet reviewed the record of trial in this case. Counsel has not yet reviewed the ROT in this case.

Through no fault of Appellant, undersigned counsel has been unable to complete her review and prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise Appellant regarding potential errors. Appellant was advised on his right to a timely appeal, was provided an update of the status of counsel's progress on Appellant's case, was consulted with regard to enlargements of time, and agrees with necessary requests for enlargements of time, including this request.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[REDACTED]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 27 October 2025.

Respectfully submitted,

[Redacted signature block]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted contact information]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 3
Senior Airman (E-4))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force.)	
<i>Appellant</i>)	29 October 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court’s Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant’s Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant nearly a year to submit an assignment of error to this Court. If Appellant’s new delay request is granted, the defense delay in this case will be 330 days in length. Appellant’s nearly year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court’s appellate processing standards. Appellant has already consumed almost two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 7 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant’s counsel has not yet reviewed of the record of trial at this late stage of the appellate process.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

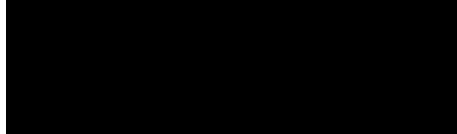


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 29 October 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	MOTION FOR ENLARGEMENT
<i>Appellee</i>)	OF TIME (NINTH)
)	
v.)	Before Panel No. 3
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	24 November 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **3 January 2026**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 320 days have elapsed. On the date requested, 360 days will have elapsed.

On 18 September 2024, Appellant was tried before a Military Judge sitting as a general court-martial at Creech Air Force Base, Nevada. Record of Trial (ROT), Vol. 1, Entry of Judgment, dated 22 October 2024. Appellant was charged with one charge with one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ); one charge with two specifications of viewing and possessing child pornography in violation of Article 134, UCMJ; and one additional charge with one specification of producing child pornography in violation of Article 134. *Id.* Contrary to his pleas, Appellant was found guilty of the lesser included offense of absence without leave for Charge I and its Specification; Charge II and its Specification; and the Additional Charge and its Specification. Record (R.) at 392. The military

judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, and confined for 14 years and 30 days.¹ R. at 490.

The Convening Authority took no action on the findings or the sentence. ROT, Convening Authority Decision on Action – *United States v. SrA Jayson G. Gonzaga*, dated 15 Oct 2024.

The electronic ROT is 1 volume and consists of 24 Prosecution Exhibits, 1 Defense Exhibit, 36 Appellate Exhibits, and 5 Court Exhibits. The total length of the electronic ROT is 1706 pages; the transcript is 490 pages. Appellant is currently confined. Counsel has not yet reviewed the ROT in this case.

The undersigned counsel is currently assigned twenty cases; fifteen cases are pending before this Court (eight cases are pending AOE). To date, four cases at this Court have priority over the present case:²

1. *United States v. Szabo*, No. ACM 40590 - The ROT is 12 volumes and consists of 7 Prosecution Exhibits, 35 Defense Exhibits, and 121 Appellate Exhibits; the transcript is 1495 pages. Appellant is not currently confined. Counsel is currently reviewing the ROT in this case.
2. *United States v. Lucas*, No. ACM 40702 - The electronic ROT is 5 volumes and consists of 11 Prosecution Exhibits, 3 Defense Exhibits, and 16 Appellate Exhibits; the transcript is

¹ For the lesser included offence to Charge I and its Specification, Appellant was sentenced to thirty days confinement. For Charge II and its Specification, Appellant was sentenced to five years confinement. For the Additional Charge and its Specification, Appellant was sentenced to fourteen years confinement. Confinement for Charge II and the Additional Charge are to run concurrently. Confinement for Charge I is to run consecutively with Charge II and the Additional Charge.

² Since the filing of Appellant's last motion for an enlargement of time, counsel has filed reply briefs in *United States v. Griffin*, ACM 40642, *United States v. Coley*, ACM 40675, and *United States v. Allen*, ACM 40809. Counsel also reviewed and filed a Merits Brief in *United States v. Nesbitt*, ACM 40679.

187 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.

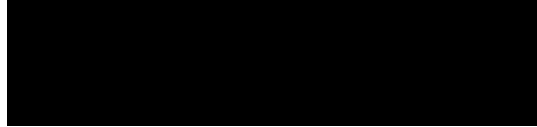
3. *United States v. Kelly*, No. ACM 40710 - The electronic ROT is 1 volume and consists of 6 Prosecution Exhibits, 8 Defense Exhibits, and 12 Appellate Exhibits; the transcript is 172 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.

4. *United States v. Lumm*, No. ACM 40752 - The electronic record of trial is 1 volume and consists of 4 Prosecution Exhibits, 14 Defense Exhibits, 7 Appellate Exhibits, and 1 Court Exhibit; the transcript is 111 pages. Appellant is not currently confined. Counsel has not yet reviewed the record of trial in this case.

Through no fault of Appellant, undersigned counsel has been unable to complete her review and prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise Appellant regarding potential errors. Appellant was advised on his right to a timely appeal, was provided an update of the status of counsel's progress on Appellant's case, was consulted with regard to enlargements of time, and agrees with necessary requests for enlargements of time, including this request.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

A solid black rectangular redaction box covering the signature of Joyclin N. Webster.

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

A solid black rectangular redaction box covering the contact information, including address and phone number.

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 24 November 2025.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Joyclin N. Webster.

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

A large black rectangular redaction box covering the contact information of Joyclin N. Webster.

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 3
Senior Airman (E-4))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force.)	
<i>Appellant</i>)	26 November 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court’s Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant’s Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant nearly a year to submit an assignment of error to this Court. If Appellant’s new delay request is granted, the defense delay in this case will be 360 days in length. Appellant’s nearly year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court’s appellate processing standards. Appellant has already consumed almost two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 6 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant’s counsel has not completed review of the record of trial at this late stage of the appellate process.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

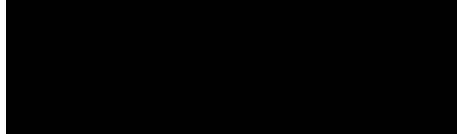


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 26 November 2025.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel
Government Trial & Appellate Operations Division



**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM 40744
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Jayson GONZAGA)	
Senior Airman (E-4))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 3

On 24 November 2025, counsel for Appellant submitted a Motion for Enlargement of Time (Ninth), requesting an additional 30 days in which to file Appellant’s assignments of error. The Government opposed Appellant’s Motion for an Enlargement of Time.

The court has considered Appellant’s motion, the Government’s opposition, case law, and this court’s Rules of Practice and Procedure.

Accordingly, it is by the court on this 26th day of November 2025,

ORDERED:

Appellant’s Motion for Enlargement of Time (Ninth) is **GRANTED**. Appellant shall file any assignments of error not later than **3 January 2026**.

Further requests by Appellant for enlargements of time may necessitate a status conference.



FOR THE COURT



JACOB B. HOEFERKAMP, Capt, USAF
Chief Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	MOTION FOR ENLARGEMENT
<i>Appellee</i>)	OF TIME (TENTH)
)	
v.)	Before Panel No. 2
)	
Senior Airman (E-4))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	26 December 2025
<i>Appellant.</i>)	

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.3(m)(3) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **2 February 2026**. The record of trial was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 352 days have elapsed. On the date requested, 390 days will have elapsed.

On 18 September 2024, Appellant was tried before a Military Judge sitting as a general court-martial at Creech Air Force Base, Nevada. Record of Trial (ROT), Vol. 1, Entry of Judgment, dated 22 October 2024. Appellant was charged with one charge with one specification of desertion in violation of Article 85, Uniform Code of Military Justice (UCMJ); one charge with two specifications viewing and possessing child pornography in violation of Article 134, UCMJ; and one additional charge with one specification of producing child pornography in violation of Article 134. *Id.* Contrary to his pleas, Appellant was found guilty of the lesser included offense of absence without leave for Charge I and its Specification; Charge II and its Specification; and the Additional Charge and its Specification. Record (R.) at 392. The military



GRANTED
30 DEC 2025

judge sentenced Appellant to be reprimanded, reduced to the grade of E-1, and confined for 14 years and 30 days.¹ R. at 490.

The Convening Authority took no action on the findings or the sentence. ROT, Convening Authority Decision on Action – *United States v. SrA Jayson G. Gonzaga*, dated 15 Oct 2024.

The electronic ROT is 1 volume and consists of 24 Prosecution Exhibits, 1 Defense Exhibit, 36 Appellate Exhibits, 5 Court Exhibits. The total length of the electronic ROT is 1706 pages; the transcript is 490 pages. Appellant is currently confined. Counsel has not yet reviewed the ROT in this case.

The undersigned counsel is currently assigned 20 cases; 14 cases are pending before this Court (8 cases are pending AOE). To date, four cases at this Court have priority over the present case:

1. *United States v. Szabo*, No. ACM 40590 - The ROT is 12 volume and consists of 7 Prosecution Exhibits, 35 Defense Exhibits, and 121 Appellate Exhibits; the transcript is 1495 pages. Appellant is not currently confined. Counsel is finalizing the AOE in this case, which is due on 29 December 2025.
2. *United States v. Lucas*, No. ACM 40702 - The electronic ROT is 5 volumes and consists of 11 Prosecution Exhibits, 3 Defense Exhibits, and 16 Appellate Exhibits; the transcript is 187 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.

¹ For the lesser included offence to Charge I and its Specification, Appellant was sentenced to 30 days confinement. For Charge II and its Specification, Appellant was sentenced to 5 years confinement. For the Additional Charge and its Specification, Appellant was sentenced to 14 years confinement. Confinement for Charge II and the Additional Charge are to run concurrently. Confinement for Charge I is to run consecutively with Charge II and the Additional Charge.

3. *United States v. Kelly*, No. ACM 40710 - The electronic ROT is 1 volume and consists of 6 Prosecution Exhibits, 8 Defense Exhibits, and 12 Appellate Exhibits; the transcript is 172 pages. Appellant is not currently confined. Counsel has not yet reviewed the ROT in this case.
4. *United States v. Lumm*, No. ACM 40752 - The electronic record of trial is 1 volume and consists of 4 Prosecution Exhibits, 14 Defense Exhibits, 7 Appellate Exhibits, and 1 Court Exhibit; the transcript is 111 pages. Appellant is not currently confined. Counsel has not yet reviewed the record of trial in this case. Counsel has not yet reviewed the ROT in this case.

The undersigned counsel is also actively preparing for an oral argument in *United States v. Menard*, USCA Dkt. No. 25-0173/AF, before the United State Court of Criminal Appeals for the Armed Forces. The oral argument is scheduled for 13 January 2026. Based on the undersigned counsel's workload, it is not feasible for her to adequately complete a review and file a quality brief on behalf of Appellant by the currant due date.

Through no fault of Appellant, undersigned counsel has been unable to complete her review and prepare a brief for Appellant's case. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise Appellant regarding potential errors. Appellant was advised on his right to a timely appeal, was provided an update of the status of counsel's progress on Appellant's case, was consulted with regard to enlargements of time, and agrees with necessary requests for enlargements of time, including this request.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant the requested enlargement of time.

Respectfully submitted,

[Redacted signature block]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[Redacted contact information]

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 26 December 2025.

Respectfully submitted,

[REDACTED]

JOYCLIN N. WEBSTER, Capt, USAF
Appellate Defense Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 2
Senior Airman (E-4))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force.)	
<i>Appellant</i>)	29 December 2025

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court’s Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant’s Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant over a year to submit an assignment of error to this Court. If Appellant’s new delay request is granted, the defense delay in this case will be 390 days in length. Appellant’s over year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court’s appellate processing standards. Appellant has already consumed more than two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 5 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant’s counsel has not completed review of the record of trial at this late stage of the appellate process.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 29 December 2025.

[REDACTED]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

fourteen years and thirty days. Trial Tr. 489. The convening authority took no action on the findings or sentence. Convening Authority Decision on Action, Oct. 15, 2024.

The one-volume electronic record of trial includes twenty-four prosecution exhibits, one defense exhibit, thirty-six appellate exhibits, and five court exhibits. The trial transcript is 490 pages. Appellant is confined.

Good cause exists to grant this requested enlargement. Appellant's detailed military appellate defense counsel is currently unavailable for medical reasons. On 13 January 2026, the undersigned counsel formed an attorney-client relationship with Appellant. On that same day, the undersigned counsel moved for access to the sealed exhibits in this case. He has read the 490-page transcript but has reviewed none of the exhibits in depth and has had no access to the sealed exhibits. Through no fault of Appellant, his detailed counsel require additional time to complete a brief on Appellant's behalf. Additional time is needed for this Court to rule on the pending motion for access to sealed materials, for the undersigned counsel to complete a review of the record of trial, and for further attorney-client communication.

In accordance with Rule 23.3(m)(6) of this Honorable Court's Rules of Practice and Procedure, counsel note the following. The undersigned counsel is currently assigned to twenty-three cases, nine of which are pending initial briefing before this Court. Eight of those nine cases (including this case) were fully contested courts-martial. He prioritizes five of those nine cases above this one:

1. *In re LB*, Misc. Dkt. No. 2025-14. On 13 January 2026, this Court granted leave to the United States and the Real Party in Interest to file a brief no later than 9 February 2026 responding to two issues in a petition for extraordinary relief filed by an alleged victim under Article 6b, UCMJ. The undersigned counsel is the Real Party in Interest's lead counsel before this Court. "To the extent practicable," an Article 6b petition for a writ of mandamus "shall have priority over all other proceedings before

the Court of Criminal Appeals.” Article 6b(e)(3)(B), UCMJ. Accordingly, preparing the Real Party in Interest’s brief in *In re LB* is the undersigned counsel’s current highest priority.

2. *United States v. Raines*, No. ACM 40765. This was a fully contested general court-martial tried before members resulting in findings of guilty to two specifications of violating Article 120, UCMJ, and eight specifications of violating Article 120b, UCMJ. The appellant received a sentence including confinement for sixteen years and is currently confined. The trial transcript is 2444 pages. The case was docketed with this Court on 23 January 2025. The undersigned counsel has reviewed the entire record except for portions of Appellate Exhibit CXXXIV, which is sealed. He has prepared drafts of several assignments of error and has identified multiple additional issues requiring further research and possibly briefing.

3. *United States v. Robinson*, No. ACM 24044 (f rev). This was a fully contested special court-martial tried before members resulting in findings of guilty to one specification of violating Article 83, UCMJ, one specification of violating Article 92, UCMJ, and one specification of violating Article 107, UCMJ. The appellant received a sentence including confinement for 131 days and reduction to the grade of E-2. The trial transcript is 1112 pages. The case was originally docketed with this Court on 30 May 2024 but this Court later remanded the record of trial for correction because the disc purporting to contain the court-martial audio could not be reviewed because it was saved in a format that could not be opened. *United States v. Robinson*, No. ACM 24044, 2025 CCA LEXIS 259 (A.F. Ct. Crim. App. June 6, 2025) (order). This Court redocketed the case on 18 July 2025. The undersigned counsel has reviewed the entire record and has drafted a portion of the appellant’s brief.

4. *United States v. Smith*, No. ACM 40782. This was a fully contested general court-martial tried before a military judge alone resulting in findings of guilty to one charge and five specifications of domestic violence in violation of Article 128b, UCMJ. The appellant received a sentence including confinement for thirty-six months and is currently confined. The trial transcript is 595 pages. The case was docketed with this Court on 25 February 2025. The undersigned government-employed civilian counsel has reviewed the entire record except for the audio of the closed court-martial session held on 23 April 2024. He has identified issues that require briefing but has not yet had an opportunity to draft that brief. Additionally, there is an issue of completeness of the record of trial. *See United States v. Smith*, No. ACM 40782 (A.F. Ct. Crim. App. Dec. 31, 2025) (order).

5. *United States v. Bowers*, No. ACM 40744. This was a fully contested general court-martial tried before a military judge alone resulting in findings of guilty to one charge of assault consummated by a battery in violation of Article 128, UCMJ. The appellant received a sentence of a reprimand and hard labor without confinement for sixty days. The trial transcript is 768 pages. The case was docketed with this Court on 27 June 2025. The undersigned counsel has reviewed the entire record except for the audio of the closed court-martial sessions held on 3, 28, and 31 October 2024. The undersigned counsel has identified one issue that will be briefed to this Court and additional issues that require further research and possible briefing. Additionally, there is an issue of completeness of the record of trial. *See United States v. Bowers*, No. ACM 40838 (A.F. Ct. Crim. App. Dec. 31, 2025) (order).

The undersigned counsel is also the lead appellate defense counsel in *United States v. Slayton*, No. 26-0077/AF, which is currently pending before the Court of Appeals for the Armed Forces upon a certificate for review. Under Court of Appeals for the Armed Forces Rule 22(b)(3), the appellee's brief will be due twenty-eight days after the filing of the Government's brief, which must be filed no later than 28 January 2026. *United States v. Slayton*, __ M.J. __, No. 26-0077/AF, 2025 CAAF LEXIS 1056 (C.A.A.F. Dec. 29, 2025) (mem.). Briefing in *Slayton* necessarily takes priority over this case.

Appellant's military appellate defense counsel's future availability remains to be determined. She currently remains assigned to this case, has not moved to withdraw, and has not reviewed the record in this case. Her unavailability will not delay the undersigned counsel's review or briefing of Appellant's case. Appellant's military appellate defense counsel's caseload consists of twenty cases overall, six of which are pending initial briefing before this Court. Her briefing priorities that she determined before her unavailability are set out below:

1. *United States v. Lucas*, No. ACM 40702 – The electronic record of trial is five volumes and includes eleven prosecution exhibits, three defense exhibits, and sixteen appellate exhibits; the transcript is 187 pages. The appellant is not currently confined. Counsel has not yet reviewed the record of trial in this case.
2. *United States v. Kelly*, No. ACM 40710 – The electronic record of trial is one volume and includes six prosecution exhibits, eight defense exhibits, and twelve appellate exhibits; the transcript is 172 pages. The appellant is not currently confined. Counsel has not yet reviewed the record of trial in this case.
3. *United States v. Lumm*, No. ACM 40752 – The electronic record of trial is one volume and includes four prosecution exhibits, fourteen defense exhibits, seven

appellate exhibits, and one court exhibit; the transcript is 111 pages. The appellant is not currently confined. Counsel has not yet reviewed the record of trial in this case.

4. *United States v. Gonzaga*, No. ACM 40744.

In accordance with this Court's order of 21 February 2025, counsel notes the following. Appellant was advised of his right to a timely appeal. Appellant has been provided an update on the status of the undersigned counsel's progress on this case. Appellant was advised of this request for enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to this request for enlargement.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant this motion.

Respectfully submitted,



Dwight H. Sullivan
Appellate Defense Counsel



Counsel for Appellant

CERTIFICATE OF FILING AND SERVICE

I certify that the foregoing was sent via email to the Court and served on the Government Trial and Appellate Operations Division on 29 January 2026.

Respectfully submitted,

A solid black rectangular redaction box covering the signature of Dwight H. Sullivan.

Dwight H. Sullivan
Appellate Defense Counsel

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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES’
)	OPPOSITION TO
<i>Appellee,</i>)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
v.)	
)	Before Panel No. 2
Staff Sergeant (E-5))	
JAYSON GONZAGA,)	No. ACM 40744
United States Air Force.)	
<i>Appellant</i>)	22 January 2026

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court’s Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant’s Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant over a year to submit an assignment of error to this Court. If Appellant’s new delay request is granted, the defense delay in this case will be 420 days in length. Appellant’s over year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court’s appellate processing standards. Appellant has already consumed more than two-thirds of the 18-month standard for this Court to issue a decision, which only leaves about 4 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant’s counsel has not completed review of the record of trial at this late stage of the appellate process.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

[REDACTED]

VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

[REDACTED]

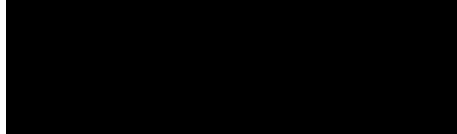
[REDACTED]

[REDACTED]

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 22 January 2026.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	APPELLANT’S MOTION FOR
)	ENLARGEMENT OF TIME
<i>Appellee</i>)	(TWELFTH)
)	
v.)	Before Panel 2
)	
Staff Sergeant (E-5))	No. ACM 40744
JAYSON GONZAGA,)	
United States Air Force,)	
<i>Appellant.</i>)	23 February 2026

TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:

Pursuant to Rule 23.3(m) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for an enlargement of time to file his brief. Appellant requests an enlargement for a period of 30 calendar days from the current due date of 4 March 2026, which will end on **3 April 2026**. This case was docketed with this Court on 8 January 2025. From the date of docketing to the present date, 411 days have elapsed. On the date requested, 450 days will have elapsed.

On 18 September 2024, Appellant was tried by a general court-martial consisting of a military judge alone at Creech Air Force Base, Nevada. Contrary to his pleas, Appellant was found guilty of one specification of absence without leave in violation of Article 86, Uniform Code of Military Justice (UCMJ); one specification of knowingly and wrongfully possessing child pornography on divers occasions in violation of Article 134, UCMJ; one specification of knowingly and wrongfully viewing child pornography on divers occasions in violation of Article 134, UCMJ; and one specification of producing child pornography on divers occasions in violation of Article 4, UCMJ. Charge Sheet; Trial Tr. 392.¹ The military judge sentenced Appellant to a reduction



GRANTED
26 FEB 2026

¹ Charge I alleged desertion terminated by apprehension in violation of Article 85, UCMJ, but

to the grade of E-1, forfeiture of all pay and allowances, a dishonorable discharge, and confinement for a total of fourteen years and thirty days. Trial Tr. 489. The convening authority took no action on the findings or sentence. Convening Authority Decision on Action, Oct. 15, 2024.

The one-volume electronic record of trial includes twenty-four prosecution exhibits, one defense exhibit, thirty-six appellate exhibits, and five court exhibits. The trial transcript is 490 pages. Appellant is confined.

Good cause exists to grant this requested enlargement. On 13 January 2026, the undersigned counsel formed an attorney-client relationship with Appellant. The undersigned counsel has read the 490-page transcript but has reviewed none of the exhibits in depth and has not accessed the sealed exhibits. (On 21 January 2026, this Court granted the undersigned counsel's motion to access those sealed materials, for which counsel is grateful.) Through no fault of Appellant, the undersigned counsel requires additional time to prepare a submission on his behalf. Additional time is needed for further attorney-client communication. This is required, in part, by the notoriously slow mail service between Joint Base Andrews and the United States Disciplinary Barracks, where Appellant is confined.

In accordance with Rule 23.3(m)(6) of this Honorable Court's Rules of Practice and Procedure, counsel notes the following. The undersigned counsel is currently assigned to twenty-four cases, eight of which are pending initial briefing before this Court. All eight were fully contested courts-martial. As discussed below, he prioritizes three of those eight cases, two Court of Appeals for the Armed Forces cases, and one Supreme Court case ahead of this case:

the military judge found Appellant guilty of the lesser included offense of absence without leave terminated by apprehension in violation of Article 86, UCMJ. Charge Sheet, Charge I, Specification; Trial Tr. 392.

1. *United States v. Slayton*, USCA Dkt. No. 26-0077/AF, ACM No. 40583. Three issues in *Slayton* were certified to the Court of Appeals for the Armed Forces at the Government's request. The appellee's brief is due on 9 March 2026. The undersigned counsel is the appellee's lead counsel.
2. *United States v. Turtu*, No. ACM 40649 (f rev). This Court's 14 January 2026 decision was mailed to the appellant on 15 January 2026, making his petition and supplement due at the Court of Appeals for the Armed Forces no later than 16 March 2026. The undersigned counsel anticipates that he will be the lead drafter of the appellant's supplement.
3. *United States v. Roberts*, No. ACM 40608. The Court of Appeals for the Armed Forces denied review on 23 January 2026, making the appellant's petition for writ of certiorari due at the Supreme Court no later than 23 April 2026. The undersigned counsel is the petitioner's lead counsel.
4. *United States v. Raines*, No. ACM 40765. This case, which is pending before this Court, was a fully contested general court-martial tried before members resulting in findings of guilty to two specifications of violating Article 120, UCMJ, and eight specifications of violating Article 120b, UCMJ. The appellant received a sentence including confinement for sixteen years and is currently confined. The trial transcript is 2444 pages. The case was docketed with this Court on 23 January 2025. The undersigned counsel is the appellant's lead counsel. He has reviewed the entire record. He has prepared drafts of several assignments of error and has identified multiple additional issues requiring further research and possibly briefing.

5. *United States v. Robinson*, No. ACM 24044 (f rev). This case, which is pending before this Court, was a fully contested special court-martial tried before members resulting in findings of guilty to one specification of violating Article 83, UCMJ; one specification of violating Article 92, UCMJ; and one specification of violating Article 107, UCMJ. The appellant received a sentence including confinement for 131 days and reduction to the grade of E-2. The trial transcript is 1112 pages. The case was originally docketed with this Court on 30 May 2024, but this Court later remanded the record of trial for correction because the disc purporting to contain the court-martial audio could not be reviewed because it was saved in a format that could not be opened. *United States v. Robinson*, No. ACM 24044, 2025 CCA LEXIS 259 (A.F. Ct. Crim. App. June 6, 2025) (order). This Court redocketed the case on 18 July 2025. The undersigned counsel is the appellant's lead counsel. He has prepared a draft brief and requires additional time to complete several accompanying filings and to communicate further with the appellant.
6. *United States v. Lowery*, No. ACM 40765. This case, which is pending before this Court, was a fully contested general court-martial tried before members resulting in a finding of guilty to one specification of violating Article 131b, UCMJ. The appellant was sentenced to a reprimand, reduction to the grade of E-2, restriction to base for forty-five days, and hard labor without confinement for thirty days. The trial transcript is 2491 pages. The case was docketed with this Court on 24 January 2025. The undersigned counsel is the appellant's lead counsel. He has reviewed the first 973 pages of the trial transcript and has thus

far identified at least one issue to be briefed to this Court.

The undersigned counsel is also scheduled to travel to Syracuse University on 26 and 27 February 2026 to participate in this Court's Project Outreach argument there, further limiting the time he will have available to prepare filings during the requested enlargement period.

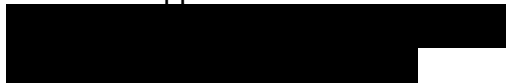
In accordance with this Court's order of 21 February 2025, counsel notes the following. Appellant was advised of his right to a timely appeal. Appellant has been provided an update on the status of the undersigned counsel's progress on this case. Appellant was advised of this request for enlargement of time. Appellant provided limited consent to disclose a confidential communication with counsel wherein Appellant consented to this request for enlargement.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant this motion.

Respectfully submitted,



Dwight H. Sullivan
Appellate Defense Counsel
Air Force Appellate Defense Division



Counsel for Appellant

CERTIFICATE OF FILING AND SERVICE

I certify that the foregoing was sent via email to the Court and served on the Government Trial and Appellate Operations Division on 23 February 2026.

Respectfully submitted,

A solid black rectangular redaction box covering the signature of Dwight H. Sullivan.

Dwight H. Sullivan
Appellate Defense
Counsel

A large, irregular black redaction box covering contact information, likely a phone number and email address.

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES'
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Staff Sergeant (E-5))	Before Panel No. 2
JAYSON GONZAGA,)	
United States Air Force,)	No. ACM 40744
<i>Appellant.</i>)	
)	25 February 2026
)	

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant over a year to submit an assignment of error to this Court. If Appellant's new delay request is granted, the defense delay in this case will be 450 days in length. Appellant's over year-long delay practically ensures this Court will not be able to issue a decision that complies with our superior Court's appellate processing standards. Appellant has already consumed more than two thirds of the 18 month standard for this Court to issue a decision, which only leaves about 3 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant's counsel has not completed review of the record of trial at this late stage of the appellate process.

WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.

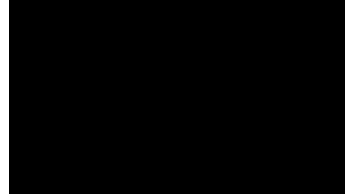


KATE E. LEE, Maj, USAF
Appellate Government Counsel



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 25 February 2026.



KATE E. LEE, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	APPELLANT’S MOTION TO
<i>Appellee</i>)	EXAMINE SEALED MATERIAL
v.)	
)	Before Panel 2
Senior Airman (E-4))	
Jayson G. Gonzaga,)	No. ACM 40744
United States Air Force,)	
<i>Appellant.</i>)	13 January 2026

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rules 3.1(c) and 23.3(f) of this Honorable Court’s Rules of Practice and Procedure and Rule for Courts-Martial 1113(b)(3)(B)(i), *Manual for Courts-Martial, United States* (2024 ed.), Appellant moves for both parties to be permitted to examine the following sealed material:

- Prosecution Exhibits 7, 8, 9, and 11.
- Preliminary Hearing Exhibits 3, 5, 7, 15, 16, 17, 18, and 19, and the attachment to Preliminary Hearing Exhibit 20.
- DD Form 457 Continuation Sheet ¶¶ k.1., k.2., k.9.c., k.10., and l.8.c.

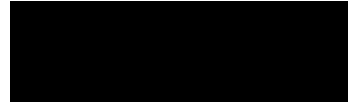
Both parties at trial had access to those sealed exhibits. *See* Trial Tr. 194–97, 206–07, 235–36, 255–57, 351; Preliminary Hearing Officer, Memorandum for All Reviewing Authorities and Counsel ¶ 2.a (Apr. 6, 2024).

In accordance with R.C.M. 1113(b)(3)(B)(i), which requires a colorable showing that examination of these matters is reasonably necessary to appellate counsel’s responsibilities, undersigned counsel asserts that review of the referenced items is necessary to conduct a complete review of the record of trial and be in a position to advocate competently on behalf of Appellant. As such, examination of these exhibits is reasonably necessary since appellant’s counsel cannot

fulfill their duties of representation under Article 70, Uniform Code of Military Justice, 10 U.S.C. § 870, without first reviewing the complete record of trial.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant this motion.

Respectfully submitted,



Dwight H. Sullivan
Appellate Defense Counsel
Air Force Appellate Defense Division

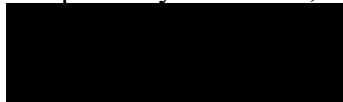


Counsel for Appellant

CERTIFICATE OF FILING AND SERVICE

I certify that the foregoing was sent via email to the Court and served on the Government Trial and Appellate Operations Division on 13 January 2026.

Respectfully submitted,



Dwight H. Sullivan
Appellate Defense Counsel



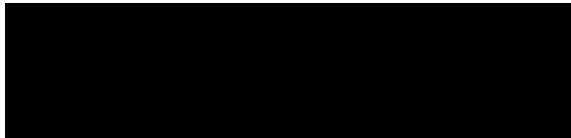
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' RESPONSE
<i>Appellee,</i>)	TO APPELLANT'S MOTION
)	TO EXAMINE SEALED
v.)	MATERIAL
)	
Senior Airman (E-4))	Before Panel No. 2
JAYSON GONZAGA, USAF,)	
<i>Appellant.</i>)	No. ACM 40744
)	
)	15 January 2026

**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States does not oppose Appellant's Motion to examine sealed material so long as both parties are permitted to examine the sealed material.

WHEREFORE, the United States respectfully requests that this Court grant Appellant's motion.

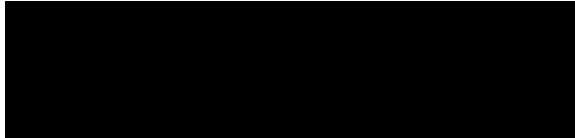


MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division



CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 15 January 2026.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division



**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM 40744
<i>Appellee</i>)	
)	
v.)	
)	ORDER
Jayson G. GONZAGA)	
Senior Airman (E-4))	
U.S. Air Force)	
<i>Appellant</i>)	Panel 2

On 13 January 2026, counsel for Appellant submitted a Motion to Examine Sealed Material. Specifically, counsel seeks permission for both parties to examine paragraphs k.1, k.2, k.9,c, k.10, and l.8.c of the Preliminary Hearing DD 457 Continuation Sheet; Preliminary Hearing Officer (PHO) Exhibits 3, 5, 7, 15, 16, 17, 18, and 19; the attachment to PHO Exhibit 20; and Prosecution Exhibits 7, 8, 9, and 11. The Government does not oppose the motion as long as its counsel may also examine the sealed materials.

Upon review of the record, the court discovered that the attachment for PHO Exhibit 20, identified as “Email from DC3, 21 March 2024 (1 page),” is not attached to PHO Exhibit 20. Instead, a placeholder sheet indicates that the attachment was previously inserted in the record of trial as PHO Exhibit 15. PHO Exhibit 15 was ordered sealed by the PHO. Appellant’s counsel requests permission to view PHO Exhibit 15.

Appellate counsel may examine sealed materials released to counsel at trial “upon a colorable showing . . . that examination is reasonably necessary to a proper fulfillment of the appellate counsel’s responsibilities.” Rule for Courts-Martial 1113(b)(3)(B)(i), *Manual for Courts-Martial, United States* (2024 ed.). The court finds Appellant’s counsel has made a colorable showing that review of the sealed materials is necessary to fulfill counsel’s duties of representation to Appellant.

The court has considered Appellant’s motion, the Government’s response, case law, and this court’s Rules of Practice and Procedure.

Accordingly, it is by the court on this 21st day of January, 2026,

ORDERED:

Appellant’s Motion to Examine Sealed Material is **GRANTED**.

It is further ordered:

Appellate defense counsel and appellate government counsel may view the paragraphs identified *supra* from the **Preliminary Hearing DD 457 Continuation Sheet**; the **Preliminary Hearing Officer Exhibits 3, 5, 7, 16, 17, 18, and 19**; **PHO Exhibit 15** (also identified as attachment to PHO Exhibit 20); and **Prosecution Exhibits 7, 8, 9, and 11**, subject to the following conditions:

To view the sealed materials, counsel will coordinate with the court.

No counsel granted access to the materials may photocopy, photograph, reproduce, disclose, or make available the content to any other individual without the court's prior written authorization.



FOR THE COURT



JACOB B. HOEFERKAMP, Capt, USAF
Chief Commissioner

**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM 40744
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF PANEL CHANGE
Jayson G. GONZAGA)	
Senior Airman (E-4))	
U.S. Air Force)	
<i>Appellant</i>)	

It is by the court on this 6th day of May, 2025,

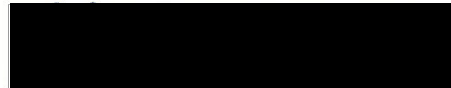
ORDERED:

That the Record of Trial in the above-styled matter is withdrawn from Panel 3 and referred to Panel 2 for appellate review.

This panel letter supersedes all previous panel assignments.



FOR THE COURT



OLGA STANFORD, Capt, USAF
Chief Commissioner

**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM 40744
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF PANEL CHANGE
Jayson G. GONZAGA)	
Senior Airman (E-4))	
U.S. Air Force)	
<i>Appellant</i>)	

It is by the court on this 4th day of August, 2025,

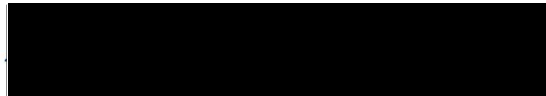
ORDERED:

That the Record of Trial in the above-styled matter is withdrawn from Panel 2 and referred to Panel 3 for appellate review.

This panel letter supersedes all previous panel assignments.



FOR THE COURT



AGNIESZKA M. GAERTNER, Capt, USAF
Commissioner

**UNITED STATES AIR FORCE
COURT OF CRIMINAL APPEALS**

UNITED STATES)	No. ACM 40744
<i>Appellee</i>)	
)	
v.)	
)	NOTICE OF PANEL
Jayson G. GONZAGA)	CHANGE
Senior Airman (E-4))	
U.S. Air Force)	
<i>Appellant</i>)	

It is by the court on this 15th day of December, 2025,

ORDERED:

That the Record of Trial in the above-styled matter is withdrawn from Panel 3 and referred to Panel 2 for appellate review.

This panel letter supersedes all previous panel assignments.



FOR THE COURT



JACOB B. HOEFERKAMP, Capt, USAF
Chief Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	APPELLANT’S MOTION TO
)	WITHDRAW FROM APPELLATE
<i>Appellee,</i>)	REVIEW AND ATTACH
)	
v.)	Before Panel No. 2
)	
Senior Airman (E-4))	No. ACM 40744
Jayson Gonzaga,)	
United States Air Force,)	
<i>Appellant.</i>)	11 March 2026

**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 16 of the Joint Rules of Appellate Practice for Courts of Criminal Appeals (JRAP) and Rule for Courts-Martial (R.C.M.) 1115, *Manual for Courts-Martial, United States* (2024 ed.), Appellant, Senior Airman Jayson Gonzaga, moves to withdraw his case from appellate review. Appellant has consulted fully with Dwight H. Sullivan, his appellate defense counsel, regarding this motion to withdraw. No person has compelled, coerced, or induced Appellant by force, promises of clemency, or otherwise, to withdraw his case from appellate review.

Further, pursuant to Rules 23(b) of the JRAP and Rule 23.3(b) of this Court’s Rules of Practice and Procedure, undersigned counsel asks this Court to attach the document appended to this motion to the record of this proceeding. The appended document, Appellant’s completed DD Form 2330, Waiver/Withdrawal of Appellate Rights in General and Special Courts-Martial Subject to Review by a Court of Criminal Appeals, is necessary to comply with R.C.M. 1115(d) and Rule 16.1 of this Court’s Rules of Practice and Procedure.

WHEREFORE, Appellant respectfully requests that this Court grant this motion to withdraw from appellate review and attach matters to the record.

Respectfully submitted,

[REDACTED]

Dwight H. Sullivan
Appellate Defense Counsel

[REDACTED]

CERTIFICATE OF FILING AND SERVICE

I certify that the foregoing was sent via email to the Court and served on the Government Trial and Appellate Operations Division on 11 March 2026.

Respectfully submitted,

[REDACTED]

Dwight H. Sullivan

[REDACTED]