

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

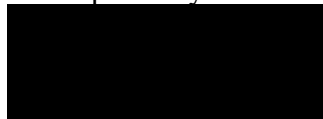
UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (FIRST)
)	
v.)	Before Panel No. 1
)	
Senior Airman (E-4),)	No. ACM S32751
AMBER D. CAMERON,)	
United States Air Force,)	21 April 2023
<i>Appellant.</i>)	


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

Pursuant to Rule 23.3(m)(2) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for her first enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 60 days, which will end on **28 June 2023**. The record of trial was docketed with this Court on 28 February 2023. From the date of docketing to the present date, 52 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,



DAVID L. BOSNER, Maj, USAF
Appellate Defense Counsel
Appellate Defense Division
United States Air Force


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 Appellate Government Division on 21 April 2023.

Respectfully submitted,



DAVID L. BOSNER, Maj, USAF
Appellate Defense Counsel
Appellate Defense Division
United States Air Force



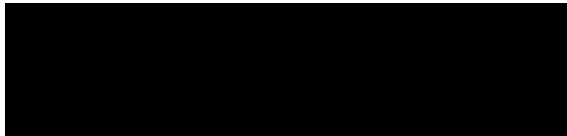
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Senior Airman (E-4))	ACM S32751
AMBER D. CAMERON, USAF,)	
<i>Appellant.</i>)	Panel No. 1
)	

**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 Assignment of Error in this case.

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

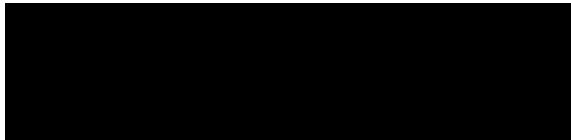


MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force



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 21 April 2023.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force



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. 1
)	
Senior Airman (E-4),)	No. ACM S32751
AMBER D. CAMERON,)	
United States Air Force,)	20 June 2023
<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 her second enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **28 July 2023**. The record of trial was docketed with this Court on 28 February 2023. From the date of docketing to the present date, 112 days have elapsed. On the date requested, 150 days will have elapsed.

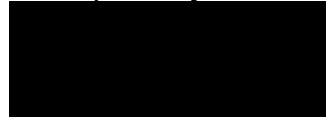
On 10 January 2023, Appellant was tried by a special court-martial composed of a military judge alone at Joint Base San Antonio, Texas. Consistent with her pleas, the military judge found Appellant guilty of one charge and one specification each of wrongful use of cocaine and wrongful possession of cocaine, in violation of Article 112a, Uniform Code of Military Justice (UCMJ). Record (R.) at 13, 69. A separate specification of wrongful use of psilocybin mushrooms was withdrawn and dismissed with prejudice. *Id.* The military judge sentenced Appellant to reduction to E-1, forfeiture of \$1,278.40 pay per month for two months, a total of 2 months confinement, and a bad conduct discharge. R. 129. The convening authority took no action on the findings or sentence. *See* Record of Trial (ROT) Vol. 1, Convening Authority Decision on Action.

The record of trial consists of three volumes. The transcript is 129 pages. There are seven Prosecution Exhibits, eight Defense Exhibits, and ten Appellate Exhibits. Appellant is not currently in confinement.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete his review of Appellant's case. Accordingly, an enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

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

Respectfully submitted,



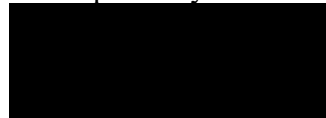
DAVID L. BOSNER, Maj, USAF
Appellate Defense Counsel
Appellate Defense Division
United States Air Force



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 Appellate Government Division on 20 June 2023.

Respectfully submitted,



DAVID L. BOSNER, Maj, USAF
Appellate Defense Counsel
Appellate Defense Division
United States Air Force



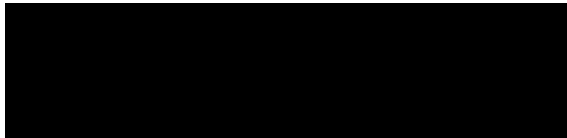
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Senior Airman (E-4))	ACM S32751
AMBER D. CAMERON, USAF,)	
<i>Appellant.</i>)	Panel No. 1
)	

**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 Assignment of Error in this case.

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

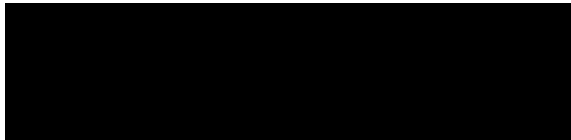


MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force



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 21 June 2023.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (THIRD)
)	
v.)	Before Panel No. 1
)	
Senior Airman (E-4),)	No. ACM S32751
AMBER D. CAMERON,)	
United States Air Force,)	20 July 2023
<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 her third enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **27 August 2023**. The record of trial was docketed with this Court on 28 February 2023. From the date of docketing to the present date, 142 days have elapsed. On the date requested, 180 days will have elapsed.

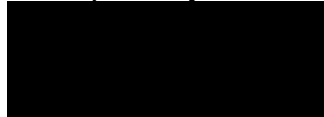
On 10 January 2023, Appellant was tried by a special court-martial composed of a military judge alone at Joint Base San Antonio, Texas. Consistent with her pleas, the military judge found Appellant guilty of one charge and one specification each of wrongful use of cocaine and wrongful possession of cocaine, in violation of Article 112a, Uniform Code of Military Justice (UCMJ). Record (R.) at 13, 69. A separate specification of wrongful use of psilocybin mushrooms was withdrawn and dismissed with prejudice. *Id.* The military judge sentenced Appellant to reduction to E-1, forfeiture of \$1,278.40 pay per month for two months, a total of 2 months confinement, and a bad conduct discharge. R. 129. The convening authority took no action on the findings or sentence. *See* Record of Trial (ROT) Vol. 1, Convening Authority Decision on Action.

The record of trial consists of three volumes. The transcript is 129 pages. There are seven Prosecution Exhibits, eight Defense Exhibits, and ten Appellate Exhibits. Appellant is not currently in confinement.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete his review of Appellant's case. Accordingly, an enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

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

Respectfully submitted,



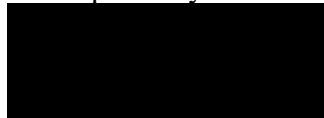
DAVID L. BOSNER, Maj, USAF
Appellate Defense Counsel
Appellate Defense Division
United States Air Force



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 Appellate Government Division on 20 July 2023.

Respectfully submitted,



DAVID L. BOSNER, Maj, USAF
Appellate Defense Counsel
Appellate Defense Division
United States Air Force



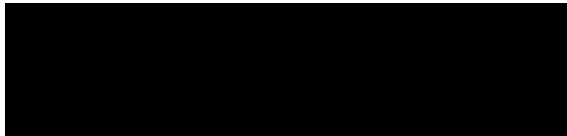
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Senior Airman (E-4))	ACM S32751
AMBER D. CAMERON, USAF,)	
<i>Appellant.</i>)	Panel No. 1
)	

**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 Assignment of Error in this case.

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

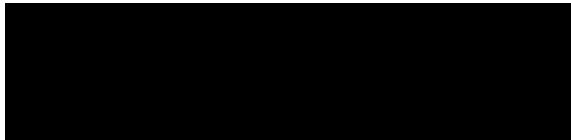


MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force



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 21 July 2023.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (FOURTH)
)	
v.)	Before Panel No. 1
)	
Senior Airman (E-4),)	No. ACM S32751
AMBER D. CAMERON,)	
United States Air Force,)	14 August 2023
<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) and 23.3(m)(6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for her fourth enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **26 September 2023**. The record of trial was docketed with this Court on 28 February 2023. From the date of docketing to the present date, 167 days have elapsed. On the date requested, 210 days will have elapsed.

On 10 January 2023, Appellant was tried by a special court-martial composed of a military judge alone at Joint Base San Antonio-Lackland, Texas. Consistent with her pleas, the military judge found Appellant guilty of one charge and one specification each of wrongful use of cocaine and wrongful possession of cocaine, in violation of Article 112a, Uniform Code of Military Justice (UCMJ). Record (R.) at 13, 69. A separate specification of wrongful use of psilocybin mushrooms was withdrawn and dismissed with prejudice. R. at 69, 133-134. The military judge sentenced Appellant to reduction to E-1, forfeiture of \$1,278.40¹ pay per month for two months, a total of

¹ On 19 January 2023, an Article 39(a), UCMJ, session was held to “correct an error in the announcement of the sentence as it pertains to forfeitures.” R. at 132. Forfeitures were “re-annouce[d]” in whole dollar amounts, resulting in an adjudged forfeiture of \$1,278.00 of pay per month for two months. R. at 133.

two months confinement, and a bad conduct discharge. R. 129. The convening authority took no action on the findings or sentence. Record of Trial (ROT) Vol. 1, *Convening Authority Decision on Action – United States v. Senior Airman Amber D. Cameron*, dated 8 February 2023.

The record of trial consists of three volumes. The transcript is 135 pages. There are seven Prosecution Exhibits, eight Defense Exhibits, and eleven Appellate Exhibits. Appellant is not currently in confinement. Appellant was advised of her right to a timely appeal.

Pursuant to A.F. CT. CRIM. APP. R. 23.3(m)(6), undersigned counsel also provides the following information.

Appellate defense counsel is currently assigned fourteen cases; nine cases are pending initial AOE's before this Court and one case is pending a grant brief before the United States Court of Appeals for the Armed Forces (CAAF). The undersigned counsel was assigned to this case on 17 July 2023, but counsel's first full day in the Appellate Defense Division was 31 July 2023. On 8 August 2023, the undersigned counsel reviewed, finalized, and filed a Supplement to the Petition for Grant of Review at the CAAF for *United States v. Wells*, USCA Dkt. No. 23-0219/AF. Five cases have priority over the present case:

1. *United States v. Leipart*, USCA Dkt. No. 23-0163/AF – The CAAF granted review on two issues on 20 July 2023. Appellant's brief and the joint appendix are due in accordance with the CAAF's order on 21 August 2023.

2. *United States v. Trueman*, ACM 40404 – The trial transcript is 134 pages long and the record of trial consists of two volumes containing three Prosecution Exhibits, zero Defense Exhibits, two Appellate Exhibits, and one Court Exhibit. Appellant is not currently in confinement. Counsel has not yet completed her review of the record of trial.

3. *United States v. Bak*, ACM 40405 – The trial transcript is 95 pages long and the record of trial is comprised of four volumes containing seven Prosecution Exhibits, two Defense Exhibits, nine Appellate Exhibits, and two Court Exhibits. Appellant is currently confined. Counsel has not yet completed her review of the record of trial.

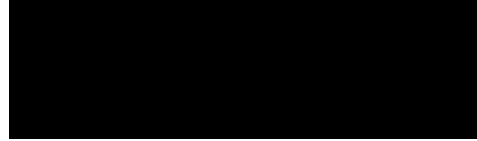
4. *United States v. Baumgartner*, ACM 40413 – The trial transcript is 797 pages long and the record of trial is seven volumes consisting of six Prosecution Exhibits, 17 Defense Exhibits, 44 Appellate Exhibits, and one Court Exhibit. Appellant is currently confined. Counsel has not yet completed her review of the record of trial.

5. *United States v. Folts*, ACM 40322 – The record of trial is eight volumes consisting of ten Prosecution Exhibits, 40 Defense Exhibits, 66 Appellate Exhibits, and one Court Exhibit. The record of trial was accompanied by a summarized transcript of 334 pages, but the verbatim transcript, produced by the Government on 21 July 2023 pursuant to this Honorable Court's order, is a combined total of 2,141 pages. Appellant is not currently confined. Counsel has not yet completed her review of the record of trial.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete her review of Appellant's case. Accordingly, an enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

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

Respectfully submitted,

A large black rectangular redaction box covering the signature of Samantha M. Castanién.

SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

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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 Appellate Government Division on 14 August 2023.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Samantha M. Castanién.

SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

Four horizontal black rectangular redaction boxes covering contact information, likely a phone number and email address.

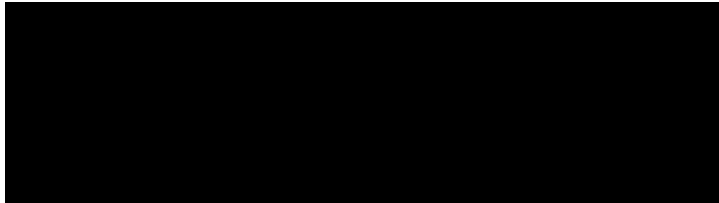
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Senior Airman (E-4))	ACM S32751
AMBER D. CAMERON, USAF,)	
<i>Appellant.</i>)	Panel No. 1
)	

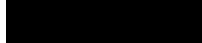
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

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 Assignment of Error in this case.

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

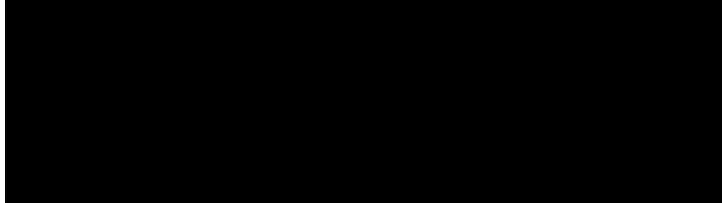


PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



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 16 August 2023.



PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR WITHDRAWAL OF
<i>Appellee,</i>)	APPELLATE DEFENSE COUNSEL
)	
v.)	Before Panel No. 1
)	
Senior Airman (E-4),)	No. ACM S32751
AMBER D. CAMERON,)	
United States Air Force,)	22 August 2023
<i>Appellant.</i>)	

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

Pursuant to Rules 12(b), 12.4, and 23.3(h) of this Honorable Court’s Rules of Practice and Procedure, undersigned counsel respectfully requests to withdraw as counsel in the above-captioned case. Captain Samantha Castanien has been detailed substitute counsel in undersigned counsel’s stead and made her notice of appearance on 14 August 2023. A thorough turnover of the record between counsel has been completed. The undersigned counsel will be departing from the Air Force Appellate Defense Division and beginning a new assignment on 5 September 2023.

Appellant has been advised of this motion to withdraw as counsel and consents to undersigned counsel’s withdrawal. A copy of this motion will be delivered to Appellant following its filing.

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

Respectfully submitted,



DAVID L. BOSNER, Maj, USAF
Appellate Defense Counsel
Appellate Defense Division
United States Air Force



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 Appellate Government Division on 22 August 2023.

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (FIFTH)
)	
v.)	
)	Before Panel No. 1
Senior Airman (E-4),)	
AMBER D. CAMERON,)	No. ACM S32751
United States Air Force,)	
<i>Appellant.</i>)	18 September 2023

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

Pursuant to Rule 23.3(m)(3) and 23.3(m)(6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for her fifth enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **26 October 2023**. The record of trial was docketed with this Court on 28 February 2023. From the date of docketing to the present date, 202 days have elapsed. On the date requested, 240 days will have elapsed.

On 10 January 2023, Appellant was tried by a special court-martial composed of a military judge alone at Joint Base San Antonio-Lackland, Texas. Consistent with her pleas, the military judge found Appellant guilty of one charge and one specification each of wrongful use of cocaine and wrongful possession of cocaine, in violation of Article 112a, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 912a. R. at 13, 69. A separate specification of wrongful use of psilocybin mushrooms was withdrawn and dismissed with prejudice. R. at 69, 133-134. The military judge sentenced Appellant to reduction to E-1, forfeiture of \$1,278.40¹ pay per month for two months, a

¹ On 19 January 2023, an Article 39(a), UCMJ, session was held to “correct an error in the announcement of the sentence as it pertains to forfeitures.” R. at 132. Forfeitures were “re-annouce[d]” in whole dollar amounts, resulting in an adjudged forfeiture of \$1,278.00 of pay per month for two months. R. at 133.

total of two months confinement, and a bad conduct discharge. R. 129. The convening authority took no action on the findings or sentence. Record of Trial (ROT) Vol. 1, *Convening Authority Decision on Action – United States v. Senior Airman Amber D. Cameron*, dated 8 February 2023.

The record of trial consists of three volumes. The transcript is 135 pages. There are seven Prosecution Exhibits, eight Defense Exhibits, and eleven Appellate Exhibits. Appellant is not currently in confinement.

Pursuant to A.F. CT. CRIM. APP. R. 23.3(m)(6), undersigned counsel also provides the following information. Appellate defense counsel is currently assigned sixteen cases; ten cases are pending initial AOE's before this Court and two cases are pending before the United States Court of Appeals for the Armed Forces (CAAF). Six cases have priority over the present case:

1. *In Re HVZ*, USCA Dkt. No. 23-0250/AF – The Judge Advocate General of the Air Force certified for review four issues, which were docketed by the CAAF on 13 September 2023. The Real Party in Interest's brief is due on 25 September 2023.

2. *United States v. Leipart*, USCA Dkt. No. 23-0163/AF – The Government's Answer Brief is expected on 20 September 2023, making the Reply Brief due on 30 September 2023. Oral argument is anticipated to occur by the end of the year.

3. *United States v. Trueman*, ACM 40404 – A Motion to Withdraw from Appellate Review was filed in this case on 13 September 2023, after military appellate defense counsel completed her review of the record. At the time of this filing, the request for withdrawal is pending action by this Court, and, as such, this case remains a priority over Appellant's case.

4. *United States v. Bak*, ACM 40405 – The trial transcript is 95 pages long and the record of trial is comprised of four volumes containing seven Prosecution Exhibits, two Defense Exhibits, nine Appellate Exhibits, and two Court Exhibits. Appellant is currently confined.

Counsel has not yet completed her review of the record of trial, but has examined all the sealed materials in the case.

5. *United States v. Baumgartner*, ACM 40413 – The trial transcript is 797 pages long and the record of trial is seven volumes consisting of six Prosecution Exhibits, 17 Defense Exhibits, 44 Appellate Exhibits, and one Court Exhibit. Appellant is currently confined. Counsel has not yet completed her review of the record of trial.

6. *United States v. Folts*, ACM 40322 – The record of trial is eight volumes consisting of ten Prosecution Exhibits, 40 Defense Exhibits, 66 Appellate Exhibits, and one Court Exhibit. The record of trial was accompanied by a summarized transcript of 334 pages, but the verbatim transcript, produced by the Government on 21 July 2023, is a combined total of 2,141 pages. Appellant is not currently confined. Counsel has not yet completed her review of the record of trial, but has filed a Motion to Examine Sealed Materials, dated 14 September 2023.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete her review of Appellant's case. Accordingly, an enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

Appellant was advised of her right to a timely appeal. Appellant was advised of the request for an enlargement of time. Appellant has provided limited consent to disclose a confidential communication with counsel wherein she consented to the request for an enlargement of time.

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

Respectfully submitted,

[REDACTED]

SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

[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 Appellate Government Division on 18 September 2023.

Respectfully submitted,

[REDACTED]

SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

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

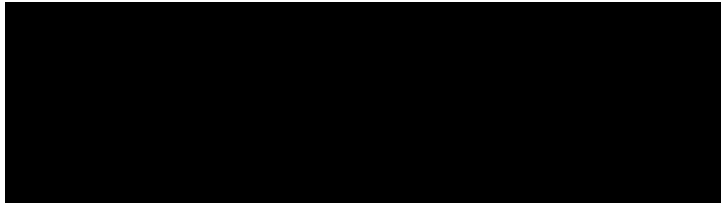
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	UNITED STATES' GENERAL
<i>Appellee,</i>)	OPPOSITION TO APPELLANT'S
)	MOTION FOR ENLARGEMENT
v.)	OF TIME
)	
Senior Airman (E-4))	ACM S32751
AMBER D. CAMERON, USAF,)	
<i>Appellant.</i>)	Panel No. 1
)	

**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 Assignment of Error in this case.

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

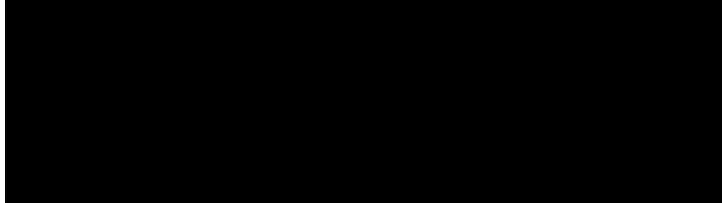


PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



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 18 September 2023.



PETE FERRELL, Lt Col, USAF
Director of Operations
Government Trial and Appellate Operations Division
Military Justice and Discipline Directorate
United States Air Force



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR WITHDRAWAL OF
<i>Appellee,</i>)	APPELLATE DEFENSE COUNSEL
)	
v.)	Before Panel No. 1
)	
Senior Airman (E-4),)	No. ACM S32751
AMBER D. CAMERON,)	
United States Air Force,)	16 October 2023
<i>Appellant.</i>)	

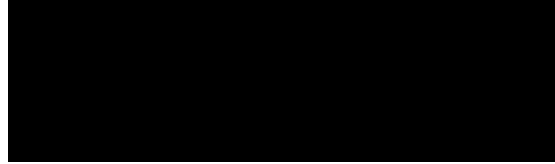
**TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rules 12(b), 12.4, and 23.3(h) of this Honorable Court’s Rules of Practice and Procedure, undersigned counsel respectfully requests to withdraw as counsel in the above-captioned case. Undersigned counsel is withdrawing to allow a more available appellate defense counsel take over Appellant’s case, as undersigned counsel has five cases prioritized over Appellant’s, delaying review. Captain Thomas Govan has been detailed substitute counsel in undersigned counsel’s stead, and he will make a notice of appearance in accordance with Rule 12.4. A thorough turnover of the record between counsel has been completed.

Appellant has been advised of this motion to withdraw as counsel and consents to undersigned counsel’s withdrawal. A copy of this motion will be delivered to Appellant following its filing.

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

Respectfully submitted,

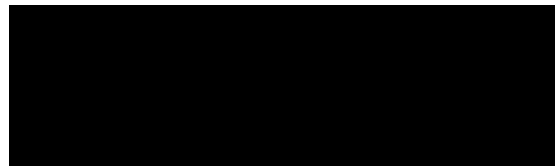


SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



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 Appellate Government Division on 16 October 2023.



SAMANTHA M. CASTANIEN, Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,)	MOTION FOR ENLARGEMENT OF
<i>Appellee,</i>)	TIME (SEVENTH)
)	
v.)	
)	Before Panel No. 1
Senior Airman (E-4),)	
AMBER D. CAMERON,)	No. ACM S32751
United States Air Force,)	
<i>Appellant.</i>)	17 November 2023

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

Pursuant to Rule 23.3(m)(3) and 23.3(m)(6) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for her seventh enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **25 December 2023**. The record of trial was docketed with this Court on 28 February 2023. From the date of docketing to the present date, 262 days have elapsed. On the date requested, 300 days will have elapsed.

On 10 January 2023, Appellant was tried by a special court-martial composed of a military judge alone at Joint Base San Antonio-Lackland, Texas. Consistent with her pleas, the military judge found Appellant guilty of one charge and one specification each of wrongful use of cocaine and wrongful possession of cocaine, in violation of Article 112a, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 912a. R. at 13, 69. A separate specification of wrongful use of psilocybin mushrooms was withdrawn and dismissed with prejudice. R. at 69, 133-134. The military judge sentenced Appellant to reduction to E-1, forfeiture of \$1,278.40¹ pay per month for two months, a

¹ On 19 January 2023, an Article 39(a), UCMJ, session was held to “correct an error in the announcement of the sentence as it pertains to forfeitures.” R. at 132. Forfeitures were “re-annouce[d]” in whole dollar amounts, resulting in an adjudged forfeiture of \$1,278.00 of pay per month for two months. R. at 133.

total of two months confinement, and a bad conduct discharge. R. at 129. The convening authority took no action on the findings or sentence. Record of Trial (ROT) Vol. 1, *Convening Authority Decision on Action – United States v. Senior Airman Amber D. Cameron*, dated 8 February 2023.

The record of trial consists of three volumes. The transcript is 135 pages. There are seven Prosecution Exhibits, eight Defense Exhibits, and eleven Appellate Exhibits. Appellant is not currently in confinement.

Pursuant to A.F. CT. CRIM. APP. R. 23.3(m)(6), current undersigned counsel also provides the following information. Undersigned appellate defense counsel recently was detailed appellate defense counsel in this case. Undersigned counsel is also detailed to *United States v. Harden*, ACM 40329, in this Court. That case had docket priority over the instant case, and this Court has issued a decision in that case on 8 November 2023. A petition for grant of review in that matter is due to be filed in the Court of Appeals for the Armed Forces on 7 January 2024. Undersigned counsel is also detailed to *United States v. Brown*, ACM S32747, in this Court. That case has docket priority over the instant case and a brief was filed in that matter on 8 November 2023.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete review of Appellant's case. Moreover, undersigned counsel is also a reservist who is not currently on orders, and, as a result, must work on appellant's case around his civilian commitments and will need additional time to complete the briefing in this case. Accordingly, an enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

Undersigned counsel has discussed this specific request with the Appellant. Specifically, (1) undersigned counsel has advised the Appellant of her right to a timely appeal; (2) undersigned counsel advised Appellant about this specific request for an enlargement of time, and (3) the Appellant agrees with the request for the enlargement of time.

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 the appellant.

THOMAS R. GOVAN, JR., Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

A solid black rectangular redaction box covering the contact information of the appellant.

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 Appellate Government Division on 17 November 2023.

Respectfully submitted,

A solid black rectangular redaction box covering the signature of the sender.

THOMAS R. GOVAN, JR., Capt, USAF
Appellate Defense Counsel
Air Force Appellate Defense Division

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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

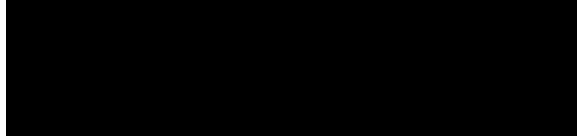
UNITED STATES,)	UNITED STATES' OPPOSITION
<i>Appellee,</i>)	TO APPELLANT'S MOTION
)	FOR ENLARGEMENT OF TIME
v.)	
)	
Senior Airman (E-4))	ACM S32751
AMBER D. CAMERON, USAF,)	
<i>Appellant.</i>)	Panel No. 1
)	

**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.

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 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.

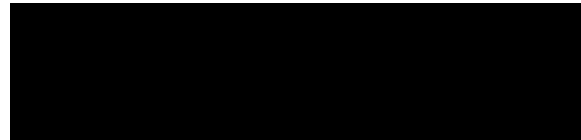


MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force



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 21 November 2023.



MARY ELLEN PAYNE
Associate Chief, Government Trial and
Appellate Operations Division
Military Justice and Discipline
United States Air Force



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES)	MOTION TO WITHDRAW FROM
<i>Appellee,</i>)	APPELLATE REVIEW AND
)	ATTACH DOCUMENT
v.)	
)	Before Panel No. 1
Senior Airman (E-4))	
AMBER D. CAMERON,)	No. ACM S32751
United States Air Force)	
<i>Appellant</i>)	Filed on: 26 December 2023

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

Pursuant to Rules for Courts-Martial 1115(e)(2), 1115(f)(3), and Rule 16 of this Honorable Court’s Rules of Practice and Procedure, the Appellant, Senior Airman (SrA) Amber D. Cameron, asks for this Court’s permission to withdraw her case from appellate review.

Furthermore, pursuant to Rule 23.3(b) of this Honorable Court’s Rules, undersigned counsel asks this Court to attach the 2-page document appended to this pleading, a Waiver/Withdrawal of Appellate Rights in General and Special Courts-Martial Subject to Review by a Court of Criminal Appeals. This document is necessary to comply with Rule for Courts-Martial 1115(d). The written, signed waiver states that SrA Cameron and undersigned counsel have discussed SrA Cameron’s rights to appellate review and the effect of withdrawal on those rights. It also states that SrA Cameron is withdrawing from appellate review voluntarily.

WHEREFORE, SrA Cameron respectfully requests that this Honorable Court grant the motion to withdraw her case from appellate review, and to grant her request to attach matters to the record.

Respectfully submitted,



THOMAS R. GOVAN, JR., Capt, USAF
Appellate Defense Counsel
AF/JAJA
United States Air Force

CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing was sent via email to the Court and served on the Appellate Government Division on 26 December 2023.



THOMAS R. GOVAN, JR., Capt, USAF
Appellate Defense Counsel
AF/JAJA
United States Air Force

