

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

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| In Re SENIOR AIRMAN (E-4) |) | PETITION FOR |
| AUSTIN D. DOMBROWSKI |) | EXTRAORDINARY RELIEF |
| United States Air Force |) | IN THE NATURE OF A WRIT |
| |) | OF HABEAS CORPUS |
| |) | |
| |) | No. ACM _____ |
| |) | |
| |) | |
| |) | |
| |) | 15 December 2025 |

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

COMES NOW Senior Airman (SrA) Austin D. Dombrowski, United States Air Force, by and through counsel, and pursuant to Rule 19 of the Joint Rules of Appellate Procedure for Courts of Criminal Appeals, hereby prays for a writ of habeas corpus directing his immediate release from pre-trial confinement.

Introduction

Petitioner SrA Dombrowski has languished in pretrial confinement for 167 days and yet no charges have been preferred against him. The Government's dilatory actions in this case while it deprives a presumptively innocent American citizen of his liberty warrants this Court's issuance of a writ of habeas corpus freeing him.

Trial defense counsel was detailed to SrA Dombrowski on 1 July 2025, the day he was placed in pretrial confinement. On 8 July 2025, at SrA Dombrowski's pretrial confinement hearing, the pretrial confinement resource officer (PCRO) determined pretrial confinement was necessary. SrA Dombrowski has since been kept in pretrial confinement with no arraignment or trial for his alleged crimes. On 20 October 2025,

the Government provided notice that they were requesting 44 days be excluded from the R.C.M. 707 speedy trial clock. Appendix G. SrA Dombrowski objected to the exclusion of time. *Id.* The Commander, 55th Wing (ACC)—the special court-martial convening authority (SPCMCA)—nevertheless granted the Government’s exclusion request. Appendix H. On 12 November 2025, after SrA Dombrowski had languished in pretrial confinement for more than 120 days, SrA Dombrowski, by and through his counsel, filed a motion for release from pretrial confinement. Appendix K. The Government responded on 19 November 2025, and the military judge denied the defense’s motion on 24 November 2025. Appendices L, M. Following the judge’s ruling, the defense continued to demand SrA Dombrowski’s right to speedy trial. Appendix N. On 8 December 2025, the Government requested 33 days be excluded from the speedy trial clock; the time period requested was excluded by the SPCMCA. Appendices O, P. SrA Dombrowski requests this Court order his immediate release from pretrial confinement because he is currently being unlawfully confined prior to arraignment in violation of his right to speedy trial under the Sixth Amendment to the United States Constitution; Article 10 of the Uniform Code of Military Justice’s requirement that when a service member is confined, “immediate steps shall be taken . . . to try the person or to dismiss the charges and release the person”; and Rule for Courts-Martial (RCM) 305’s provisions.

Statement of the Issue

Whether SrA Dombrowski is entitled to a writ of habeas corpus ordering his immediate release from pretrial confinement where:

(1) He has been confined for 167 days without preferral or referral of charges, in violation of the Accused's right to a speedy trial under the Sixth Amendment to the U.S. Constitution, the 120-day clock mandated by R.C.M. 707, and the "immediate steps" requirement of Article 10, UCMJ;

(2) The Government has retroactively excluded 77 days from the speedy trial clock for routine administrative delays without good cause, in violation of R.C.M. 707(c) and Article 10, UCMJ;

(3) The PCRO abused her discretion in violation of R.C.M. 305(i)(2)(B) by ordering confinement based on threadbare evidence consisting of an uncorroborated anonymous tip and by failing to meaningfully consider less severe forms of restraint as required by R.C.M. 305(h)(2)(B) and Article 13, UCMJ; and

(4) The military judge has refused to rule on these dispositive constitutional and statutory violations pre-referral, leaving SrA Dombrowski without any adequate means of relief in the trial court, resulting in a continued deprivation of liberty without due process of law in violation of the Fifth Amendment to the U.S. Constitution.

Specific Relief Sought

SrA Dombrowski seeks a writ of habeas corpus ordering his immediate relief from confinement.

History of the Case

On 1 July 2025, SrA Dombrowski was ordered into pretrial confinement. On 8 July 2025, the PCRO determined continued confinement was necessary. SrA

Dombrowski asserted his right to a speedy trial on 9 July 2025 and five subsequent occasions. On 12 November 2025, the Defense moved for release from confinement based on speedy trial violations. The military judge denied the motion on 24 November 2025, ruling she lacked authority to review the constitutional claims pre-referral. As of this filing, SrA Dombrowski has been confined for 167 days without preferral of charges, with the SPCMCA retroactively excluding 77 days from the speedy trial clock over Defense objection.

SrA Dombrowski requests this Court issue a writ of habeas corpus ordering his immediate release from confinement. *See, e.g., Noyd v. Bond*, 395 U.S. 683 (1969).

Statement of Facts

On or about 1 July 2025, Special Agent BD, Office of Special Investigations, Detachment 204, Offutt Air Force Base, Nebraska received a National Center for Missing & Exploited Children (NCMEC) CyberTip allegedly pertaining to SrA Dombrowski. Appendix A. The NCMEC CyberTip alleges that SrA Dombrowski was planning to meet with a “predator to have sex with children on 1-3 July 2025.” *Id.* at page 2. The CyberTip further alleges that SrA Dombrowski possessed and distributed child sexual abuse materials (CSAM). *Id.*

SA BD purports to have conducted a search of SrA Dombrowski’s phone and observed what appeared to be CSAM in the Google Photos app. *Id.* at page 3. SA BD further purports to have reviewed messages between SrA Dombrowski and Ms. SR, the wife of SrA Dombrowski. *Id.* SA BD alleges the messages he reviewed pertained

to engaging in incest, bestiality, and sexual intercourse between themselves and their future children. *Id.* at page 4.

On 1 July 2025, Lieutenant Colonel TA, 20 IS/CC, ordered SrA Dombrowski into pretrial confinement. Appendix B. In support of this order, Lt Col TA alleged that SrA Dombrowski committed the following offenses: (1) conspiracy (Article 120: rape of a child) in violation of Article 81, UCMJ; (2) possessing, receiving, or viewing child pornography in violation of Article 134, UCMJ; and (3) distributing child pornography in violation of Article 134, UCMJ. *Id.*

On 2 July 2025, Lieutenant Colonel RS, 343d Reconnaissance Squadron Commander, conducted the 48-hour review required by R.C.M. 305(j)(l). Appendix C. The review memo consisted of two paragraphs. *Id.* The first paragraph stated Lt Col RS found “adequate probable cause” that the following offenses triable by court-martial were committed by SrA Dombrowski: (a) conspiracy (Article 120: Rape of child) **on 22 June 2025** in violation of Article 81, UCMJ, *id.* at 1.a.; (b) possessing, receiving, or viewing child pornography **on 22 June 2025** in violation of Article 134, UCMJ, *id.* at 1.b.; and (c) distribution of child pornography **on 22 June 2025** in violation of Article 134, UCMJ. *Id.* at 1.c.

The second paragraph stated Lt Col RS had “reasonable grounds to believe continued pretrial confinement is necessary because it is foreseeable that the confinee will engage in serious criminal misconduct.” Appendix C. Lt Col RS’s second sentence in that paragraph concluded that he had “reasonable grounds to believe less severe forms of restraint are inadequate.” *Id.* There was no discussion

regarding what the reasonable grounds were on any point nor what less severe forms of restraint were considered or why those forms would be inadequate.

On 3 July 2025, Lt Col TA, 20 IS/CC, conducted the 72-hour review required by R.C.M. 305(i)(2)(C). Appendix D. Lt Col TA determined he had reasonable grounds to believe the alleged offenses described in the 48-hour memorandum were committed. *Id.* at 3. Lt Col TA found that pretrial confinement “is necessary because it is foreseeable that the confinee will engage in serious criminal misconduct.” *Id.* He stated, “[G]iven the nature of the offenses and [SrA Dombrowski’s] his recent pattern of misconduct, the requirements for pretrial confinement are met.” *Id.* at 4.e. Finally, Lt Col TA stated he considered “lesser forms of restraint” and found them inadequate, given “SrA Dombrowski’s use of his cell phone to engage in these activities.” *Id.* Lt Col TA supported his findings with 3 attachments. *Id.*

On 8 July 2025, Lieutenant Colonel REW, 55th Aircraft Maintenance Squadron Commander, held a PCRO hearing in which she heard testimony from SA BD. Appendix E. The Government did not record the hearing, so the following quotes are from Lt Col REW’s PCRO Memorandum and not exact quotes from the testimony:

SA BD received both tipster reports made on 22 June 2025 to the FBI and NCMEC and was notified of them on 1 July 2025. *Id.* at 6.e. These reports alleged that the anonymous tipster spoke to SrA Dombrowski in a group on the reddit app, in a subgroup, and in the sessions messaging app. *Id.* The Reddit post stated the intent was to find parents willing to show off their children. *Id.* The tipster

indicated that by responding to SrA Dombrowski, they started a sessions app conversation that led to planning for the tipster and SrA Dombrowski to meet the tipster's children and have sex with them. *Id.* SA BD testified that at the time of the hearing, OSI had not yet received a warrant to search the sessions app within SrA Dombrowski's phone. *Id.* He further stated that the contact information of the person the tipster spoke to aligned with SrA Dombrowski. *Id.* SA BD shared that OSI received a warrant to search photos, texts, and the Reddit app on SrA Dombrowski's phone where they confirmed he is the owner of the reddit account referenced by the tipster. *Id.* Additionally, he stated OSI found folders of 240-245 photos and videos of CSAM of children aged under 1 year old to children approximately 14-16 years of age. *Id.* SA BD also testified that he found text messages between SrA Dombrowski and his wife discussing having sex in front of their children, encouraging sex between their children, and implied having sex with their own children. *Id.* SrA Dombrowski did not have any children at the time of the hearing. *Id.* SA BD further testified that the messages do not explicitly state SrA Dombrowski wanted to have sex with his own children but that it was strongly implied. *Id.* He also testified that the only information OSI had about the attempt to meet up and have sex with the tipster's children came from the anonymous report and there were no screenshots available to view. *Id.*

Lt Col REW found by a preponderance of the evidence that SrA Dombrowski committed two of the three offenses triable by court-martial. *Id.* at 8. Lt Col REW found there was "insufficient evidence" regarding distribution of child pornography.

Id. at 8.a. She also found “that confinement is necessary because it is foreseeable that the accused will engage in serious criminal misconduct conduct” and “that less severe forms of restraint are inadequate.” *Id.* at 8. She also found continued pretrial confinement was required under the criteria set forth under R.C.M. 305(i)(2)(B) for the following reasons:

a. Besides the charge regarding distribution of child pornography, she found sufficient evidence that the other two offenses would be triable by a court-martial. *Id.* at 8.a.

b. The testimony that 200-240 images and videos were found on SrA Dombrowski’s phone and downloaded with the most recent date of 17 June 2025 was evidence to show he possessed, received, or viewed child pornography. *Id.* at 8.b.

c. Further, she stated there was sufficient evidence that SrA Dombrowski engaged in conspiracy to rape a child when he solicited and arranged to interact in a sexual nature with minors. *Id.* at 8.b. Lt Col REW came to this conclusion due to the tipster’s report and the text messages between SrA Dombrowski and his wife. *Id.* at 8.b.

d. Though she noted that SrA Dombrowski does not have children readily accessible to him, Lt Col REW stated because he had made efforts to obtain and maintain CSAM and he had attempted to connect with parents willing to show off their children, he would attempt to continue to pursue CSAM pictures and videos and support a system that creates and distributes CSAM. *Id.* at 8.c. Hence, she

believed he would continue to engage in serious criminal misconduct and confinement is necessary. *Id.* at 8.c.

e. Finally, Lt Col REW stated that the weight of the evidence against SrA Dombrowski after only one week of an investigation, as well as the nature and severity of the offenses and the connection to his wife, confirmed to her that less severe forms of restraint are inadequate. *Id.* at 8.d. Lt Col REW provided no explanation as to which less severe forms of restraint were considered. *Id.* at 8.d.

On 9 July 2025, upon receiving notice of the PCRO's determination to continue pretrial confinement, SrA Dombrowski first demanded his right to speedy trial. Appendix F. On the same day, the Government acknowledged receipt of this demand. *Id.* On 19 September 2025, SrA Dombrowski reasserted his right to a speedy trial. *Id.* On the same day, the Government acknowledged receipt of this demand. *Id.*

On 6 October 2025, SrA Dombrowski again asserted his right to a speedy trial. *Id.* On 7 October 2025, the Government acknowledged receipt of this demand. *Id.* On 17 October 2025, SrA Dombrowski again asserted his right to a speedy trial. *Id.* On 20 October 2025, the Government stated they expect "an update within the week." *Id.*

On 20 October 2025, the Government provided notice that they were requesting 44 days be excluded retroactively from the R.C.M. 707 speedy trial clock. Appendix G. SrA Dombrowski objected to the exclusion of time, and again asserted his right to a speedy trial. *Id.* On 21 October 2025, the Government acknowledged

the objection and provided the Defense a memorandum from Colonel ATG, Commander, 55th Wing, Offutt Air Force Base, Nebraska, approving an exclusion of time from 25 August 2025 to 8 October 2025. Appendix H.

On 27 October 2025, SrA Dombrowski again asserted his right to a speedy trial. Appendix F.

On 30 October 2025, SrA Dombrowski submitted a memorandum titled “Demand for Speedy Trial – U.S. v. SrA Austin Dombrowski” to the Office of Special Trial Counsel (OSTC), General Court-Martial Convening Authority (GCMCA) and their servicing legal office, and Special Court-Martial Convening Authority (SPCMCA) and their servicing legal office. Appendices I and J. On 30 October 2025, Major AS, Deputy Chief Special Trial Counsel, District 1, OSTC, acknowledged receipt of the demand. Appendix J. As of this filing, the Government has not provided a response to the demand, nor has the Government preferred charges against SrA Dombrowski.

On 12 November 2025, 134 days after SrA Dombrowski entered pretrial confinement, the defense filed a motion for release from PTC. Appendix K. The motion raised several issues as to his continued confinement including abuse of authority by the PCRO, lack of considering alternatives, and speedy trial issues - Constitutional, Article 10, UCMJ, and RCM 707. *Id.*

On 19 November 2025, the Government submitted a response to the motion. Appendix L. The Government only responded to the abuse of authority claim and

purported that an Article 30a proceeding cannot address speedy trial issues as release from PTC was not an authorized remedy. *Id.*

On 24 November 2025, the Military Judge denied the motion. Appendix M. In the ruling, the Military Judge only addressed the abuse of authority. *Id.*

Following the Military Judge's ruling, the defense continued to demand SrA Dombrowski's right to speedy trial. Appendix N. On 8 December 2025, the Government requested 33 days be excluded from the speedy trial clock. Appendix O. The SPCMCA approved the exclusion of time from 15 October 2025 to 17 November 2025 on 8 December 2025. Appendix P. The defense objected to this exclusion on 8 December 2025. Appendix Q.

Other than the litigation pursuant to Article 30a, UCMJ, no actions have been filed in any court and none are pending seeking the same relief.

Jurisdictional Basis for Relief Sought and Reason Why Relief Cannot be Obtained During the Ordinary Course of Appellate Review

This Court has the authority to grant extraordinary relief pursuant to the All Writs Act, 28 U.S.C. § 1651(a). As the United States Court of Appeals for the Armed Forces (CAAF) has made clear, “[t]he authority of the Courts of Criminal Appeals to exercise jurisdiction under the All Writs Act . . . is well established.” *United States v. Dowty*, 48 M.J. 102, 106 (C.A.A.F. 1998) (internal footnote omitted). “[M]ilitary courts, like Article III tribunals, are empowered to issue extraordinary writs under the All Writs Act.” *United States v. Denedo*, 556 U.S. 904, 911 (2009). The All Writs Act is not an independent grant of jurisdiction, nor does it expand a court's existing statutory jurisdiction. *Clinton v. Goldsmith*, 526 U.S. 529, 534–35 (1999). The All

Writs Act requires two determinations: (1) whether the requested writ is in aid of the court's existing jurisdiction; and (2) whether the requested writ is necessary or appropriate. *LRM v. Kastenberg*, 72 M.J. 364, 368 (C.A.A.F. 2013) (internal quotation marks and citations omitted). Additionally, "[a] writ petition may be in aid of a court's jurisdiction even on interlocutory matters where no finding or sentence has been entered in the court-martial." *Id.*

Relief cannot be obtained during the ordinary course of appellate review because SrA Dombrowski is suffering an ongoing illegal, unconstitutional deprivation of his liberty and the Government's failure to even prefer—let alone refer—charges against him despite 167 days of pretrial confinement thwarts his ability to obtain judicial relief other than through a habeas petition.

Reasons for Grant the Writ*Reasons for*

A writ of habeas corpus is the appropriate remedy to secure release from illegal confinement. *See Preiser v. Rodriguez*, 411 U.S. 475, 484 (1973). This Court possesses the authority to grant such relief under the All Writs Act, 28 U.S.C. § 1651(a), to protect its future appellate jurisdiction. *See Noyd*, 395 U.S. at 695 n.7 (acknowledging the power of military appellate courts to grant emergency relief from confinement pending review).

Extraordinary relief is required here because SrA Dombrowski is being deprived of his liberty in violation of the UCMJ and the Constitution. As the Supreme Court observed, a service member "should not be required to surrender his freedom for even [two days] unless it is found that the law so requires." *Id.* at 699. Where the

Government fails to comply with the strict procedural safeguards required to justify pretrial confinement, the law does not require—and indeed forbids—the surrender of that freedom. A writ of habeas corpus is the only means to vindicate that fundamental right when the trial judiciary cannot or will not intervene.

I. Senior Airman Dombrowski is Entitled to a Writ of Habeas Corpus

A. He has no other adequate means to obtain relief.

The military judge denied SrA Dombrowski's Motion for Appropriate Relief: Release from Pretrial Confinement. Appendix M. In her written ruling, the military judge explicitly declined to consider SrA Dombrowski's arguments regarding violations of his due process and speedy trial rights under the Fifth and Sixth Amendments, Article 10, UCMJ, and R.C.M. 707. *Id.* at ¶ 24. The military judge held that her authority to review pretrial confinement pre-referral was strictly limited by R.C.M. 309(b)(6) and R.C.M. 305(k)(1) to reviewing the 7-day reviewing officer's decision for abuse of discretion. *Id.* at ¶ 24 n.3. Consequently, she ruled that the Defense's constitutional and statutory speedy trial arguments were outside the scope of her authority and would not be considered. *Id.* at ¶ 24.

Because the Government has failed to prefer or refer charges after 167 days of confinement, SrA Dombrowski has no mechanism to compel a ruling on these dispositive issues in the trial court. He is trapped in a legal limbo: confined by the Government, yet prevented by the Government's own inaction from accessing the trial-level judicial forum to challenge the legality of that confinement's duration. Ordinary appellate review is unavailable because there is no court-martial

conviction to appeal, and the trial judiciary has closed its doors to his constitutional claims until the Government chooses to act. Thus, seeking a writ of habeas corpus is his only available avenue to redress the ongoing and unlawful deprivation of his liberty.

B. The right to issuance of relief is clear and indisputable

SrA Dombrowski's right to relief is clear and indisputable because his continued pretrial confinement violates his Fifth Amendment right to due process, his Sixth Amendment right to a speedy trial, the statutory mandates of Article 10, UCMJ, and the presidentially prescribed requirements of R.C.M. 707.

1. The PCRO Abused Discretion by Ordering Confinement Based on Insufficient Evidence.

The PCRO abused her discretion by finding it foreseeable that SrA Dombrowski would engage in serious criminal misconduct based on threadbare evidence consisting entirely of an uncorroborated anonymous tip and an agent's subjective interpretation of ambiguous text messages. As established in *United States v. Miller*, 46 M.J. 63 (1997), and *United States v. Houser*, 36 M.J. 392 (C.M.A. 1993), an abuse of discretion occurs when a decision is "arbitrary, fanciful, clearly unreasonable, or clearly erroneous." Here, the PCRO's finding that confinement was necessary--despite SrA Dombrowski having no prior criminal history of this nature and no actual evidence of a meeting or plan to meet—was clearly unreasonable. Although the PCRO's memorandum recited the legal conclusion that "less severe forms of restraint are inadequate," she failed to

articulate any factual basis for why specific, viable alternatives would be insufficient. Specifically, she did not address why restriction to base limits combined with a prohibition on possessing internet-capable devices would fail to mitigate the alleged risk. R.C.M. 305 demands more than a conclusory check-the-box finding. It requires a meaningful evaluation of whether conditions short of confinement can reasonably mitigate the alleged risk. By summarily dismissing these less severe forms of restraint without explaining why they would fail to prevent the alleged misconduct, the PCRO failed to apply the required legal standard. This failure renders her decision an abuse of discretion.

2. Violation of R.C.M. 707 and Article 10 Speedy Trial Rights.

The Government has failed to bring SrA Dombrowski to trial within the 120-day clock mandated by R.C.M. 707. As of the date of this filing, SrA Dombrowski has been confined for 167 days without preferral of charges. The Government's retroactive attempt to exclude 44 days for routine administrative delays (shipping evidence) and another 33 days for reasons which are unclear, are legally insufficient to toll the speedy trial clock and constitutes a transparent attempt to retroactively cure a fatal procedural error. Furthermore, the Government has violated Article 10, UCMJ, which demands "immediate steps" to try a confined person. Holding a service member for over four months without even preferring charges is the antithesis of immediate and a clear violation of statutory rights.

3. Deprivation of Liberty Without Due Process.

Continued confinement under these circumstances constitutes punishment before trial, violating the Fifth Amendment and Article 13, UCMJ. As the Supreme Court noted in *Noyd v. Bond*, a service member “should not be required to surrender his freedom for even [two days] unless it is found that the law so requires.” 395 U.S. at 699. The law does not require, nor does it permit, indefinite confinement based on uncharged allegations and a lapsed speedy trial clock.

C. The issuance of relief is appropriate under the circumstances.

Issuance of the writ is appropriate and necessary because SrA Dombrowski has exhausted all other adequate means of relief and continues to suffer a severe deprivation of liberty.

1. Exhaustion of Remedies.

SrA Dombrowski has diligently pursued every available avenue for relief. He challenged the confinement at the 7-day PCRO hearing. He submitted multiple demands for a speedy trial to the Government and the Convening Authority on 9 July, 19 September, 6 October, 17 October, 20 October, 27 October, and 30 October 2025. He filed a motion for release from pretrial confinement with the military judge, which was denied on 24 November 2025. The military judge’s ruling failed to address the speedy trial violations because charges had not yet been referred, leaving SrA Dombrowski in a legal limbo where he is confined but cannot litigate the dispositive speedy trial issue.

2. Necessity of Extraordinary Relief.

Without this Court's intervention, SrA Dombrowski will remain unlawfully confined in violation of the Constitution, Article 10, and R.C.M. 707. The military judge has indicated an inability or unwillingness to address the speedy trial aspect of the confinement release motion pre-referral. Appendix M at ¶ 24. Because the Government has delayed preferring charges, the normal appellate review process is unavailable and insufficient to protect SrA Dombrowski from immediate and ongoing prejudice. A writ of habeas corpus is the only mechanism available to correct this clear error of judgment and end the unlawful deprivation of Petitioner's liberty.

Respondents' Addresses, Telephone Numbers, and Email Addresses

The respondents' contact information is provided below:

Major Matthew B. Ford, in his
official capacity as Commanding Officer,
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Relief Sought

SrA Dombrowski requests that this Court grant this Petition for Extraordinary Relief in the nature of a Writ of Habeas Corpus and order SrA Dombrowski's immediate release from pretrial confinement at F.E. Warren AFB, WY confinement facility.

Respectfully submitted,

CORTEZ.JAMES.MI
CHAEL.1384419247

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**JAMES M. CORTEZ, Capt, USAF
Defense Counsel**



Counsel for Petitioner

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 Major Matthew B. Ford, the Government Trial and Appellate Operations Division, and Maj Ashleigh T. Nguyen on 15 December 2025.

Respectfully submitted,

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