

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

UNITED STATES	)	No. ACM S32833
<i>Appellee</i>	)	
	)	
v.	)	
	)	ORDER
Jacob D. REID	)	
Staff Sergeant (E-5)	)	
U.S. Air Force	)	
<i>Appellant</i>	)	Panel 2

On 26 October 2025, counsel for Appellant submitted a Motion for Enlargement of Time (First) requesting an additional 60 days to submit Appellant's assignments of error. The Government opposed 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 3rd day of November, 2025,

ORDERED:

Appellant's Motion for Enlargement of Time (First) is **GRANTED**. Appellant shall file any assignments of error not later than **8 January 2026**.

Each request for an enlargement of time will be considered on its merits. 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

JACOB B. HOEFERKAMP, Capt, USAF
Chief Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES	)	APPELLANT’S MOTION FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME (FIRST)
	)	
v.	)	Before Panel 2
	)	
Staff Sergeant (E-5)	)	No. ACM S32833
JACOB D. REID	)	
United States Air Force	)	26 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)(1) and (2) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his first enlargement of time to file an Assignment of Error (AOE). Appellant requests an enlargement for a period of 60 days, which will end on **8 January 2025**. This case was docketed with this Court on **10 September 2025**. From the date of docketing to the present date, 46 days have elapsed. On the date requested, 120 days will have elapsed.

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

Respectfully submitted,

[Redacted Signature]

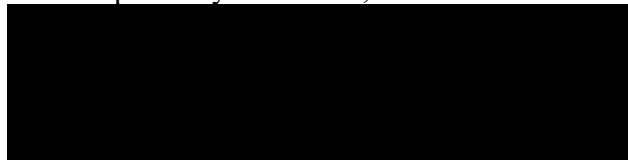
OLGA STANFORD, Capt, USAF
Appellate Defense Counsel

[Redacted]

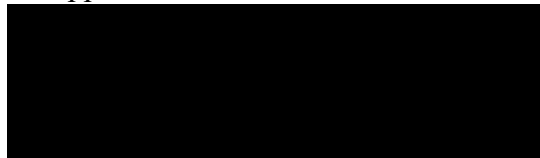
CERTIFICATE OF FILING AND SERVICE

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 October 2025.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, Capt, USAF
Appellate Defense Counsel

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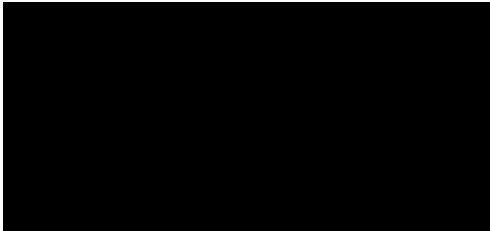
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Staff Sergeant (E-5)	)	Before Panel No. 2
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	28 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 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.

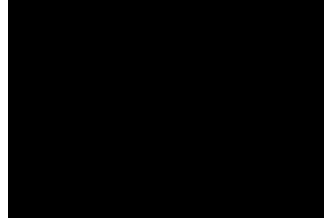


KATE E. LEE, Maj, USAF
Appellate Government Counsel

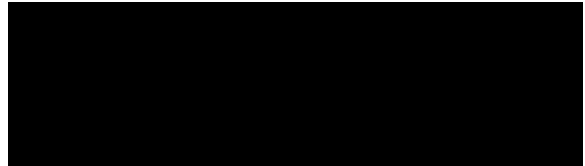


CERTIFICATE OF FILING AND SERVICE

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



KATE E. LEE, Maj, USAF
Appellate Government Counsel



UNITED STATES) No. ACM S32833
Appellee)
))
))
v.)
))
Jacob D. REID) NOTICE OF PANEL
Staff Sergeant (E-5)) CHANGE
))
U.S. Air Force)
Appellant)

ORDERED:

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 FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME (SECOND)
	)	
v.	)	Before Panel 2
	)	
Staff Sergeant (E-5)	)	No. ACM S32833
JACOB D. REID	)	
United States Air Force	)	17 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) and (4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his second enlargement of time to file an Assignment of Error (AOE) brief. Appellant requests an enlargement for a period of 30 days, which will end on **7 February 2026**. This case was docketed with this Court on 10 September 2025. From the date of docketing to the present date, 100 days have elapsed. On the date requested, 150 days will have elapsed.

On 20 May 2025, Appellant was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with his pleas, the military judge found Appellant guilty of service discrediting conduct, in violation of Article 134, Uniform Code of Military Justice, 10 U.S.C. § 934. R. at 23, 113. On 20 May 2025, the military judge sentenced Appellant to a bad conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or the sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action – United States v. Staff Sergeant Jacob D. Reid.

The digital record of trial is 640 pages, consisting of five appellate exhibits, four defense exhibits, and twenty-two defense exhibits. The transcript is 174 pages.



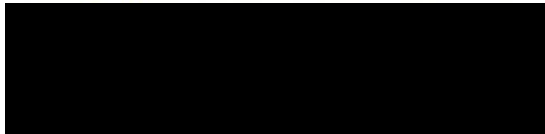
GRANTED
22 DEC 2025

Through no fault of Appellant, the undersigned counsel has been unable to complete her review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Appellant has provided limited consent to disclose confidential communications, wherein:

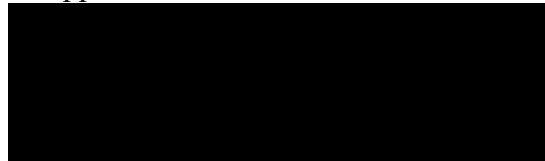
- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has specifically consented to this enlargement of time.

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

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, Capt, USAF
Appellate Defense Counsel

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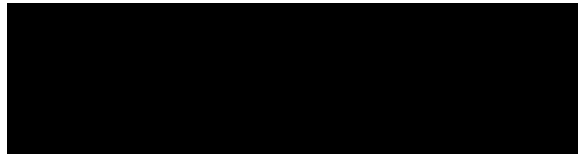
CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 17 December 2025.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, ^UCapt, ^UUSAF
Appellate Defense Counsel

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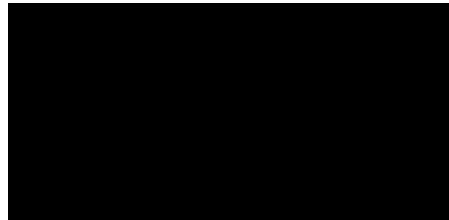
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Staff Sergeant (E-5)	)	Before Panel No. 1
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	19 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 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.



KATE E. LEE, Maj, USAF
Appellate Government Counsel

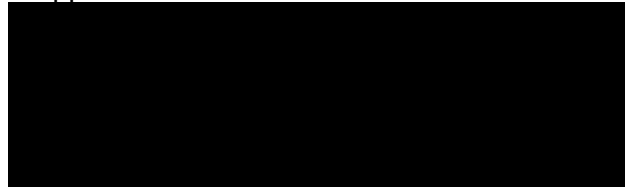


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 19 December 2025.



KATE E. LEE, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES	)	APPELLANT’S MOTION FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME (THIRD)
	)	
v.	)	Before Panel 1
	)	
Staff Sergeant (E-5)	)	No. ACM S32833
JACOB D. REID	)	
United States Air Force	)	21 January 2026
<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 (4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his third enlargement of time to file an Assignment of Error (AOE) brief. Appellant requests an enlargement for a period of 30 days, which will end on **9 March 2026**. This case was docketed with this Court on 10 September 2025. From the date of docketing to the present date, 133 days have elapsed. On the date requested, 180 days will have elapsed.

On 20 May 2025, Appellant was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with his pleas, the military judge found Appellant guilty of service discrediting conduct, in violation of Article 134, Uniform Code of Military Justice, 10 U.S.C. § 934. R. at 23, 113. On 20 May 2025, the military judge sentenced Appellant to a bad conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or the sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action – United States v. Staff Sergeant Jacob D. Reid.



Record of trial is 640 pages, consisting of five appellate exhibits, four pre-trial exhibits, and twenty-two defense exhibits. The transcript is 174 pages.

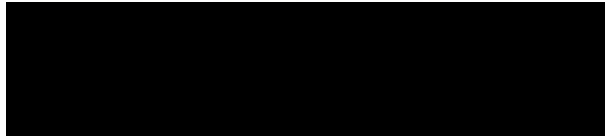
GRANTED
26 JAN 2026

Through no fault of Appellant, the undersigned counsel has been unable to complete her review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Appellant has provided limited consent to disclose confidential communications, wherein:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has specifically consented to this enlargement of time.

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

Respectfully submitted,

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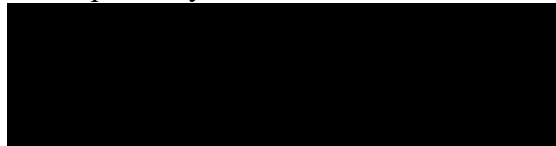
OLGA STANFORD, Capt, USAF
Appellate Defense Counsel

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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 Government Trial and Appellate Operations Division on 21 January 2026.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, ^UCapt, USAF
Appellate Defense Counsel

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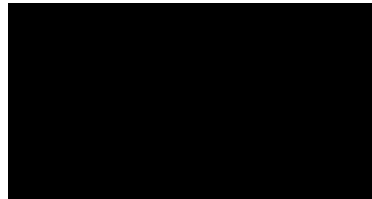
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Staff Sergeant (E-5)	)	Before Panel No. 1
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	23 January 2026
	)	

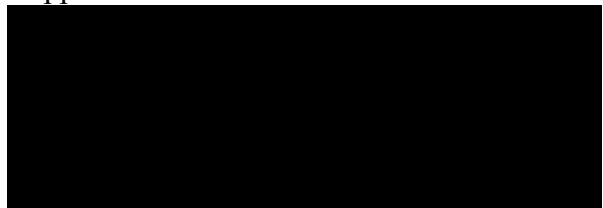
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its 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.

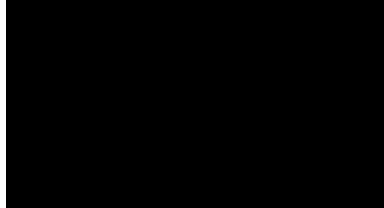


KATE E. LEE, Maj, USAF
Appellate Government Counsel

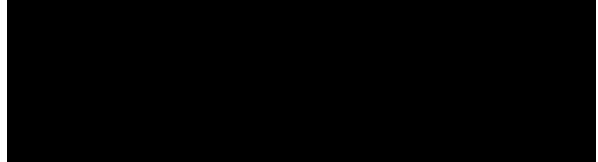


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 23 January 2026.



KATE E. LEE, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES	)	APPELLANT’S MOTION FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME (FOURTH)
	)	
v.	)	Before Panel 1
	)	
Staff Sergeant (E-5)	)	No. ACM S32833
JACOB D. REID	)	
United States Air Force	)	5 February 2026
<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 (4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his fourth enlargement of time to file an Assignment of Error (AOE) brief. Appellant requests an enlargement for a period of 30 days, which will end on **8 April 2026**. This case was docketed with this Court on 10 September 2025. From the date of docketing to the present date, 148 days have elapsed. On the date requested, 210 days will have elapsed.

On 20 May 2025, Appellant was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with his pleas, the military judge found Appellant guilty of service discrediting conduct, in violation of Article 134, Uniform Code of Military Justice, 10 U.S.C. § 934. R. at 23, 113. On 20 May 2025, the military judge sentenced Appellant to a bad conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or the sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action – United States v. Staff Sergeant Jacob D. Reid.

The digital record of trial is 640 pages, consisting of five appellate exhibits, four prosecution exhibits, and twenty-two defense exhibits. The transcript is 174 pages. Appellant is



GRANTED
12 FEB 2026

not confined. Counsel is currently assigned twenty-seven cases; twenty-seven of those cases are pending before this Court (twenty-four are pending AOE). Undersigned counsel expects to file reply brief in one of the cases pending before this court: *United States v. Anderson*, ACM No. 40850. Of the cases pending AOE brief, twelve cases have priority over this case:

1. *United States v. Broadway*, ACM No. 40834 – The digital record of trial is 1557 pages consisting of twenty-nine appellate exhibits, twenty-seven prosecution exhibits, and seven defense exhibits. The transcript is 744 pages long. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
2. *United States v. Fowler*, ACM No. S32821 – The digital record of trial is 346 pages consisting of three appellate exhibits and four prosecution exhibits. The transcript is seventy-nine pages long. Appellant is not currently confined. Undersigned counsel has not completed her review of the record in this case.
3. *United States v. Fife*, ACM No. 40829 – The digital record of trial is 837 pages consisting of twenty-two appellate exhibits, three prosecution exhibits, six defense exhibits, and one court exhibit. The transcript is 319 pages long. Appellant is currently confined. Undersigned counsel has completed her review of the record in this case.
4. *United States v. Tiexeira*, ACM No. 40831 – The digital record of trial is 1530 pages consisting of forty appellate exhibits, five prosecution exhibits, and fourteen defense exhibits. The transcript is 146 pages long. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
5. *United States v. Marin*, ACM No. 40831 – The digital record of trial is 2287 pages, consisting of fifty-one appellate exhibits, sixteen prosecution exhibits, and sixteen

defense exhibits. The transcript is 788 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.

6. *United States v. Rice*, ACM No. 40851 – The digital record of trial is 610 pages, consisting of twenty appellate exhibits, three prosecution exhibits, eleven defense exhibits, and one court exhibit. The transcript is 234 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
7. *United States v. Doby*, ACM No. 40794 – The digital record of trial is 393 pages, consisting of four appellate exhibits and 3 prosecution exhibits. The transcript is 101 pages. Appellant is not confined. Undersigned counsel has completed her review of the record.
8. *United States v. Champaco*, ACM No. S32828 – The digital record of trial is 945 pages, consisting of 12 appellate exhibits, 5 prosecution exhibits, and 6 defense exhibits. The transcript is 243 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.
9. *United States v. Davis*, ACM No. S32829 – The digital record of trial is 430 pages, consisting of 7 appellate exhibits, 6 prosecution exhibits, and 1 defense exhibit. The transcript is 168 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.
10. *United States v. Johnson*, ACM No. 25090 – The digital record of trial is 1506 pages, consisting of 27 appellate exhibits, 15 prosecution exhibits, and 17 defense exhibits. The transcript is 989 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.

11. *United States v. Taylor*, ACM No. S32831 – The digital record of trial is 864 pages, consisting of 8 appellate exhibits, 6 prosecution exhibits, 5 defense exhibits, and 2 court exhibits. The transcript is 168 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.

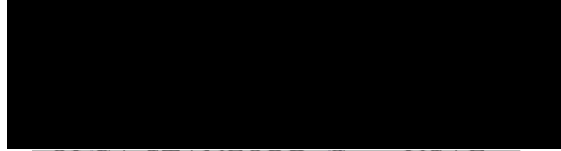
12. *United States v. Banks*, ACM No. 40877 – The digital record of trial is 1331 pages, consisting of twelve appellate exhibits and six prosecution exhibits. The transcript is 97 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.

Through no fault of Appellant, the undersigned counsel has been unable to complete her review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Appellant has provided limited consent to disclose confidential communications, wherein:

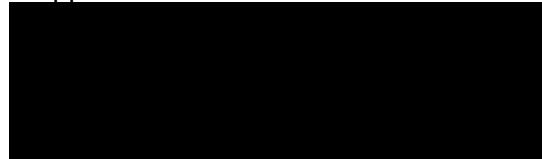
- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has specifically consented to this enlargement of time.

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

Respectfully submitted,

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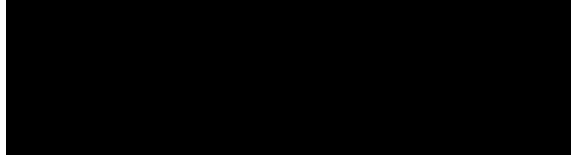
OLGA STANFORD, Capt, USAF
Appellate Defense Counsel

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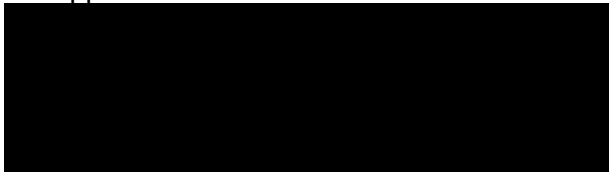
CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 5 February 2026.

Respectfully submitted



OLGA STANFORD, ^UCapt, ^UUSAF
Appellate Defense Counsel



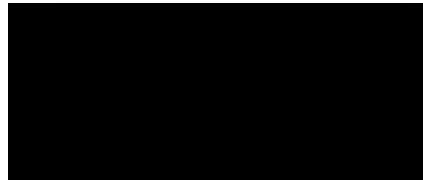
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Staff Sergeant (E-5)	)	Before Panel No. 1
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	9 February 2026
	)	

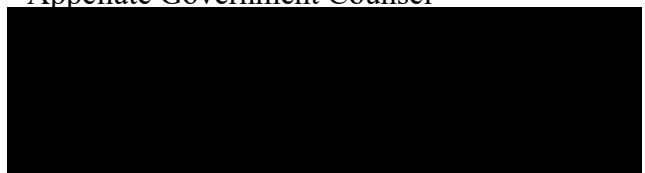
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its 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.

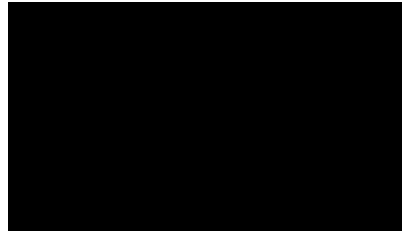


KATE E. LEE, Maj, USAF
Appellate Government Counsel



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 9 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 FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME (FIFTH)
	)	
v.	)	Before Panel 1
	)	
Staff Sergeant (E-5)	)	No. ACM S32833
JACOB D. REID	)	
United States Air Force	)	26 March 2026
<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 (4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his fifth enlargement of time to file an Assignment of Error (AOE) brief. Appellant requests an enlargement for a period of 30 days, which will end on **8 May 2026**. This case was docketed with this Court on 10 September 2025. From the date of docketing to the present date, 197 days have elapsed. On the date requested, 240 days will have elapsed.

On 20 May 2025, Appellant was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with his pleas, the military judge found Appellant guilty of service discrediting conduct, in violation of Article 134, Uniform Code of Military Justice, 10 U.S.C. § 934. R. at 23, 113. On 20 May 2025, the military judge sentenced Appellant to a bad conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or the sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action – United States Sergeant Jacob D. Reid.

The full record of trial is 640 pages, consisting of five appellate exhibits, four prosecution exhibits, and twenty-two defense exhibits. The transcript is 174 pages. Appellant is



GRANTED
30 MAR 2026

not confined. Counsel is currently assigned twenty-nine cases; twenty-eight of those cases are pending before this Court (twenty-six are pending AOE). Undersigned counsel expects to file reply brief in one of the cases pending before this court: *United States v. Anderson*, ACM No. 40850. Of the cases pending AOE brief, eleven cases have priority over this case:

1. *United States v. Broadway*, ACM No. 40834 – The digital record of trial is 1557 pages consisting of twenty-nine appellate exhibits, twenty-seven prosecution exhibits, and seven defense exhibits. The transcript is 744 pages long. Appellant is currently confined. Undersigned counsel completed her review of the record in this case and began drafting AOE brief.
2. *United States v. Johnson*, ACM No. 25090 – The digital record of trial is 1506 pages, consisting of 27 appellate exhibits, 15 prosecution exhibits, and 17 defense exhibits. The transcript is 989 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.
3. *United States v. Fowler*, ACM No. S32821 – The digital record of trial is 346 pages consisting of three appellate exhibits and four prosecution exhibits. The transcript is seventy-nine pages long. Appellant is not currently confined. Undersigned counsel has not completed her review of the record in this case.
4. *United States v. Teixeira*, ACM No. 40831 – The digital record of trial is 1530 pages consisting of forty appellate exhibits, five prosecution exhibits, and fourteen defense exhibits. The transcript is 146 pages long. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
5. *United States v. Marin*, ACM No. 40831 – The digital record of trial is 2287 pages, consisting of fifty-one appellate exhibits, sixteen prosecution exhibits, and sixteen

defense exhibits. The transcript is 788 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.

6. *United States v. Rice*, ACM No. 40851 – The digital record of trial is 610 pages, consisting of twenty appellate exhibits, three prosecution exhibits, eleven defense exhibits, and one court exhibit. The transcript is 234 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
7. *United States v. Champaco*, ACM No. S32828 – The digital record of trial is 945 pages, consisting of 12 appellate exhibits, 5 prosecution exhibits, and 6 defense exhibits. The transcript is 243 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.
8. *United States v. Davis*, ACM No. S32829 – The digital record of trial is 430 pages, consisting of 7 appellate exhibits, 6 prosecution exhibits, and 1 defense exhibit. The transcript is 168 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.
9. *United States v. Johnson*, ACM No. 25090 – The digital record of trial is 1506 pages, consisting of 27 appellate exhibits, 15 prosecution exhibits, and 17 defense exhibits. The transcript is 989 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.
10. *United States v. Taylor*, ACM No. S32831 – The digital record of trial is 864 pages, consisting of 8 appellate exhibits, 6 prosecution exhibits, 5 defense exhibits, and 2 court exhibits. The transcript is 168 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.

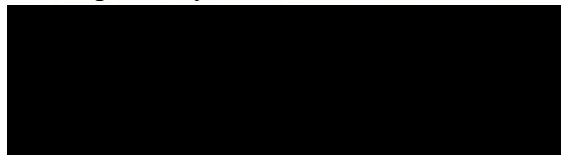
11. *United States v. Banks*, ACM No. 40877 – The digital record of trial is 1331 pages, consisting of twelve appellate exhibits and six prosecution exhibits. The transcript is 97 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.

Through no fault of Appellant, the undersigned counsel has been unable to complete her review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Appellant has provided limited consent to disclose confidential communications, wherein:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has specifically consented to this enlargement of time.

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

Respectfully submitted,



OLGA STANFORD, Capt, USAF
Appellate Defense Counsel



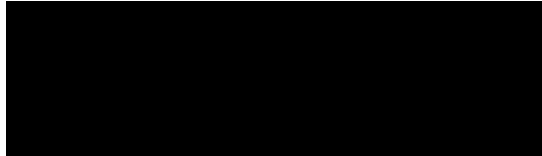
CERTIFICATE OF FILING AND SERVICE

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 26 March 2026.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, Capt, USAF
Appellate Defense Counsel

A large black rectangular redaction box covering the contact information of Olga Stanford.

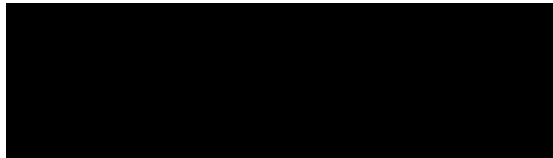
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Staff Sergeant (E-5)	)	Before Panel No. 1
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	27 March 2026
	)	

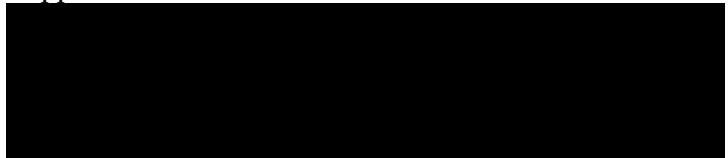
**TO THE HONORABLE, THE JUDGES OF
THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS:**

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its 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.

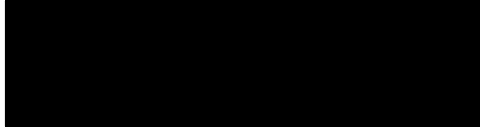


VANESSA BAIROS, Maj, USAF
Appellate Government Counsel

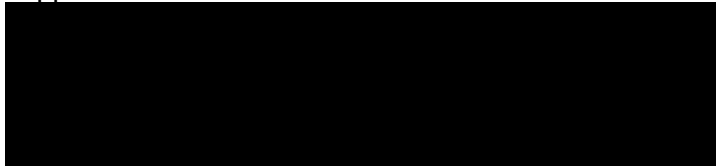


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 27 March 2026.



VANESSA BAIROS, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES	)	APPELLANT’S MOTION FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME (SIXTH)
	)	OUT OF TIME*
v.	)	
	)	Before Panel 1
Staff Sergeant (E-5)	)	
JACOB D. REID	)	No. ACM S32833
United States Air Force	)	
<i>Appellant.</i>	)	4 May 2026

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

Pursuant to Rule 23.3(m)(3) and (4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his sixth enlargement of time, out of time, to file an Assignment of Error (AOE) brief. Appellant requests an enlargement for a period of 30 days, which will end on **7 June 2026**. This case was docketed with this Court on 10 September 2025. From the date of docketing to the present date, 236 days have elapsed. On the date requested, 270 days will have elapsed.

On 20 May 2025, Appellant was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with his pleas, the military judge found Appellant guilty of service discrediting conduct, in violation of Article 134, Uniform Code of Military Justice, 10 U.S.C. § 934. R. at 23, 113. On 20 May 2025, the military judge sentenced Appellant to a bad conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or

* Due to unintentional calendaring oversight on the part of Appellant’s counsel, the deadline for submission of the EOT in this matter was mistakenly believed to be 2 May 2026. As a result, this motion for enlargement of time was filed after the deadline established by this Honorable Court. This delay was not the product of bad faith, and upon recognizing the discrepancy, counsel acted promptly to remedy the situation. Appellant bears no responsibility for the delay.



GRANTED
8 MAY 2026

the sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action – United States v. Staff Sergeant Jacob D. Reid.

The digital record of trial is 640 pages, consisting of five appellate exhibits, four prosecution exhibits, and twenty-two defense exhibits. The transcript is 174 pages. Appellant is not confined. Counsel is currently assigned twenty-seven cases; twenty-six of those cases are pending before this Court (twenty-five are pending AOE). Undersigned counsel is filing a reply brief in one of the cases pending before this court: *United States v. Anderson*, ACM No. 40850 (4 May 2026 filing deadline). Additionally, within the next week, the undersigned counsel expects to file a petition and supplement with the Court of Appeals for the Armed Forces in *United States v. Bogert*, ACM No. 40855 (11 May 2026 filing deadline). Of the cases pending AOE brief, eight cases have priority over this case:

1. *United States v. Broadway*, ACM No. 40834 – The digital record of trial is 1557 pages consisting of twenty-nine appellate exhibits, twenty-seven prosecution exhibits, and seven defense exhibits. The transcript is 744 pages long. Appellant is currently confined. Undersigned counsel completed her review of the record in this case and is in the process of making the final edits to the brief before the 5 May 2026 filing deadline.
2. *United States v. Johnson*, ACM No. 25090 – The digital record of trial is 1506 pages, consisting of 27 appellate exhibits, 15 prosecution exhibits, and 17 defense exhibits. The transcript is 989 pages. Appellant is not confined. Undersigned counsel began but has not completed her review of the record in this case.
3. *United States v. Fowler*, ACM No. S32821 – The digital record of trial is 346 pages consisting of three appellate exhibits and four prosecution exhibits. The transcript is

seventy-nine pages long. Appellant is not currently confined. Undersigned counsel has not completed her review of the record in this case.

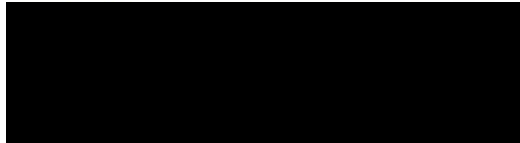
4. *United States v. Tiexeira*, ACM No. 40831 – The digital record of trial is 1530 pages consisting of forty appellate exhibits, five prosecution exhibits, and fourteen defense exhibits. The transcript is 146 pages long. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
5. *United States v. Marin*, ACM No. 40831 – The digital record of trial is 2287 pages, consisting of fifty-one appellate exhibits, sixteen prosecution exhibits, and sixteen defense exhibits. The transcript is 788 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
6. *United States v. Rice*, ACM No. 40851 – The digital record of trial is 610 pages, consisting of twenty appellate exhibits, three prosecution exhibits, eleven defense exhibits, and one court exhibit. The transcript is 234 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
7. *United States v. Taylor*, ACM No. S32831 – The digital record of trial is 864 pages, consisting of 8 appellate exhibits, 6 prosecution exhibits, 5 defense exhibits, and 2 court exhibits. The transcript is 168 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.
8. *United States v. Banks*, ACM No. 40877 – The digital record of trial is 1331 pages, consisting of twelve appellate exhibits and six prosecution exhibits. The transcript is 97 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.

Through no fault of Appellant, the undersigned counsel has been unable to begin her review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Appellant has provided limited consent to disclose confidential communications, wherein:

- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has specifically consented to this enlargement of time.

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

Respectfully submitted,



OLGA STANFORD, 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 4 May 2026.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, ^UCapt, ^UUSAF
Appellate Defense Counsel

A large black rectangular redaction box covering the contact information of Olga Stanford.

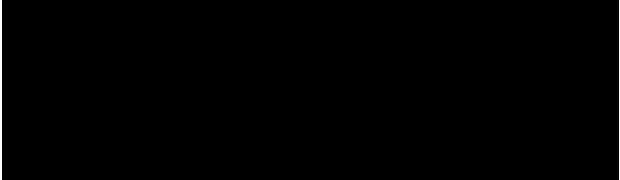
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Staff Sergeant (E-5)	)	Before Panel No. 1
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	5 May 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 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.

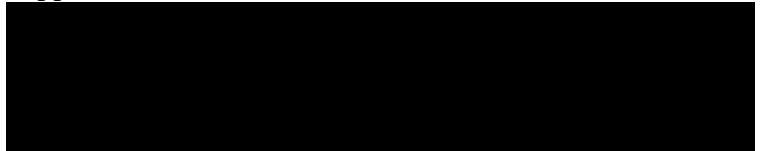

REGINA HENENLOTTER, Maj, USAF
Appellate Government Counsel


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 5 May 2026.



REGINA HENENLOTTER, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES	)	APPELLANT’S MOTION FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME
	)	(SEVENTH)
v.	)	
	)	Before Panel 1
Staff Sergeant (E-5)	)	
JACOB D. REID	)	No. ACM S32833
United States Air Force	)	
<i>Appellant.</i>	)	28 May 2026

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

Pursuant to Rule 23.3(m)(3) and (4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his seventh enlargement of time, out of time, to file an Assignment of Error (AOE) brief. Appellant requests an enlargement for a period of 30 days, which will end on **7 July 2026**. This case was docketed with this Court on 10 September 2025. From the date of docketing to the present date, 260 days have elapsed. On the date requested, 300 days will have elapsed.

On 20 May 2025, Appellant was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with his pleas, the military judge found Appellant guilty of service discrediting conduct, in violation of Article 134, Uniform Code of Military Justice, 10 U.S.C. § 934. R. at 23, 113. On 20 May 2025, the military judge sentenced Appellant to a bad conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or the sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action – United States v. Staff Sergeant Jacob D. Reid.

Record of trial is 640 pages, consisting of five appellate exhibits, four pre-trial exhibits, and twenty-two defense exhibits. The transcript is 174 pages. Appellant is



GRANTED
1 JUN 2026

not confined. Counsel is currently assigned thirty-one cases; thirty of those cases are pending before this Court (twenty-eight are pending AOE's). Within the next three weeks, undersigned counsel expects to file reply brief in one of the cases pending before this court: *United States v. Broadway*, ACM No. 40834. Within the next week, the undersigned counsel expects to file a supplement with the Court of Appeals for the Armed Forces in *United States v. Bogert*, ACM No. 40855. Of the cases pending AOE brief, seven cases have priority over this case:

1. *United States v. Johnson*, ACM No. 25090 – The digital record of trial is 1506 pages, consisting of 27 appellate exhibits, 15 prosecution exhibits, and 17 defense exhibits. The transcript is 989 pages. Appellant is not confined. Undersigned counsel began but has not completed her review of the record in this case.
2. *United States v. Fowler*, ACM No. S32821 – The digital record of trial is 346 pages consisting of three appellate exhibits and four prosecution exhibits. The transcript is seventy-nine pages long. Appellant is not currently confined. Undersigned counsel has not completed her review of the record in this case.
3. *United States v. Tiexeira*, ACM No. 40831 – The digital record of trial is 1530 pages consisting of forty appellate exhibits, five prosecution exhibits, and fourteen defense exhibits. The transcript is 146 pages long. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
4. *United States v. Marin*, ACM No. 40831 – The digital record of trial is 2287 pages, consisting of fifty-one appellate exhibits, sixteen prosecution exhibits, and sixteen defense exhibits. The transcript is 788 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.

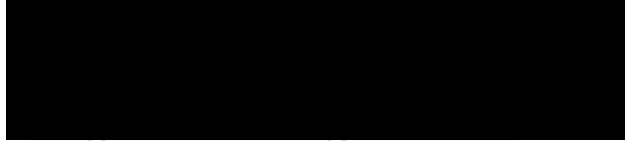
5. *United States v. Rice*, ACM No. 40851 – The digital record of trial is 610 pages, consisting of twenty appellate exhibits, three prosecution exhibits, eleven defense exhibits, and one court exhibit. The transcript is 234 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
6. *United States v. Taylor*, ACM No. S32831 – The digital record of trial is 864 pages, consisting of 8 appellate exhibits, 6 prosecution exhibits, 5 defense exhibits, and 2 court exhibits. The transcript is 168 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.
7. *United States v. Banks*, ACM No. 40877 – The digital record of trial is 1331 pages, consisting of twelve appellate exhibits and six prosecution exhibits. The transcript is 97 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.

Through no fault of Appellant, the undersigned counsel has been unable to begin her review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Appellant has provided limited consent to disclose confidential communications, wherein:

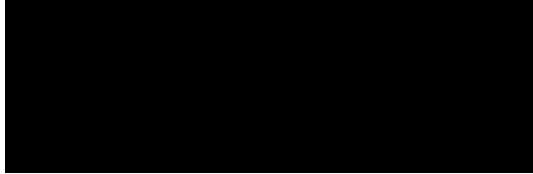
- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has specifically consented to this enlargement of time.

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

Respectfully submitted,

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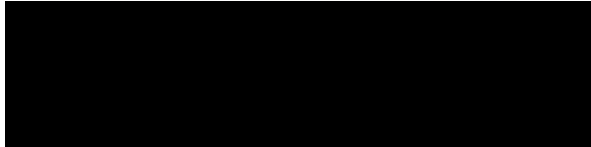
OLGA STANFORD, ^UCapt, USAF
Appellate Defense Counsel

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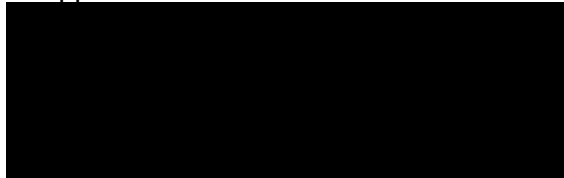
CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 28 May 2026.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, Capt, USAF
Appellate Defense Counsel

A large black rectangular redaction box covering the contact information of Olga Stanford.

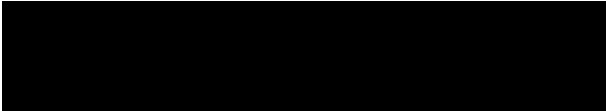
IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Staff Sergeant (E-5)	)	Before Panel No. 1
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	1 June 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 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.

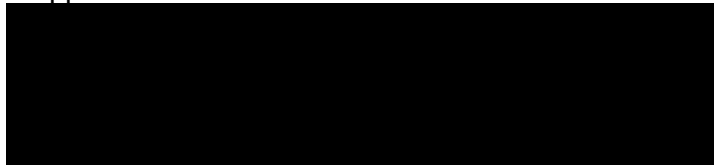

HEATHER R. BEZOLD, Maj, USAF
Appellate Government Counsel


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 1 June 2026.



HEATHER R. BEZOLD, Maj, USAF
Appellate Government Counsel



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES	)	APPELLANT’S MOTION FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME
	)	(EIGHTH)
v.	)	
	)	Before Panel 1
Staff Sergeant (E-5)	)	
JACOB D. REID	)	No. ACM S32833
United States Air Force	)	
<i>Appellant.</i>	)	29 June 2026

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

Pursuant to Rule 23.3(m)(3) and (4) of this Honorable Court’s Rules of Practice and Procedure, Appellant hereby moves for his eighth enlargement of time, out of time, to file an Assignment of Error (AOE) brief. Appellant requests an enlargement for a period of 30 days, which will end on **6 August 2026**. This case was docketed with this Court on 10 September 2025. From the date of docketing to the present date, 292 days have elapsed. On the date requested, 330 days will have elapsed.

On 20 May 2025, Appellant was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with his pleas, the military judge found Appellant guilty of service discrediting conduct, in violation of Article 134, Uniform Code of Military Justice, 10 U.S.C. § 934. R. at 23, 113. On 20 May 2025, the military judge sentenced Appellant to a bad conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or the sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action – United States v. Staff Sergeant Jacob D. Reid.



digital record of trial is 640 pages, consisting of five appellate exhibits, four exhibits, and twenty-two defense exhibits. The transcript is 174 pages. Appellant is

GRANTED
30 JUN 2026

not confined. Counsel is currently assigned thirty-six cases; thirty-five of those cases are pending before this Court (thirty-three are pending AOE briefs). Of the cases pending AOE brief, seven cases have priority over this case:

1. *United States v. Johnson*, ACM No. 25090 – The digital record of trial is 1506 pages, consisting of 27 appellate exhibits, 15 prosecution exhibits, and 17 defense exhibits. The transcript is 989 pages. Appellant is not confined. Undersigned counsel began but has not completed her review of the record in this case.
2. *United States v. Fowler*, ACM No. S32821 – The digital record of trial is 346 pages consisting of three appellate exhibits and four prosecution exhibits. The transcript is seventy-nine pages long. Appellant is not currently confined. Undersigned counsel has not completed her review of the record in this case.
3. *United States v. Teixeira*, ACM No. 40831 – The digital record of trial is 1530 pages consisting of forty appellate exhibits, five prosecution exhibits, and fourteen defense exhibits. The transcript is 146 pages long. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
4. *United States v. Marin*, ACM No. 40831 – The digital record of trial is 2287 pages, consisting of fifty-one appellate exhibits, sixteen prosecution exhibits, and sixteen defense exhibits. The transcript is 788 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.
5. *United States v. Rice*, ACM No. 40851 – The digital record of trial is 610 pages, consisting of twenty appellate exhibits, three prosecution exhibits, eleven defense exhibits, and one court exhibit. The transcript is 234 pages. Appellant is currently confined. Undersigned counsel has not completed her review of the record in this case.

6. *United States v. Taylor*, ACM No. S32831 – The digital record of trial is 864 pages, consisting of 8 appellate exhibits, 6 prosecution exhibits, 5 defense exhibits, and 2 court exhibits. The transcript is 168 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.
7. *United States v. Banks*, ACM No. 40877 – The digital record of trial is 1331 pages, consisting of twelve appellate exhibits and six prosecution exhibits. The transcript is 97 pages. Appellant is not confined. Undersigned counsel has not completed her review of the record in this case.

Through no fault of Appellant, the undersigned counsel has been unable to begin her review and prepare a brief of Appellant's case. An enlargement of time is necessary to allow counsel time to fully review Appellant's case and advise Appellant regarding potential errors. Appellant has provided limited consent to disclose confidential communications, wherein:

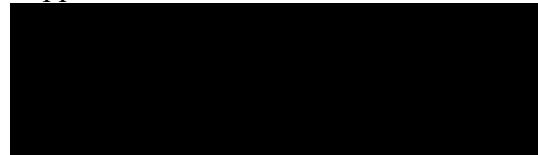
- (1) Appellant has been advised of his right to a timely appeal.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) Appellant has specifically consented to this enlargement of time.

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

Respectfully submitted,

A large black rectangular redaction box covering the signature of the Appellate Defense Counsel.

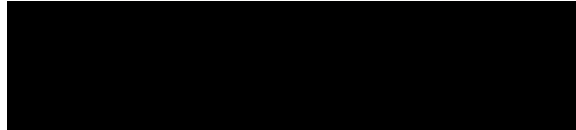
Appellate Defense Counsel

A large black rectangular redaction box covering the contact information of the Appellate Defense Counsel.

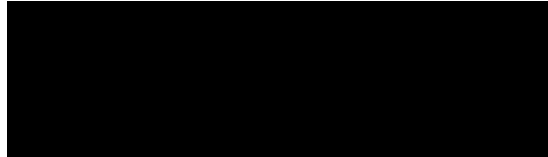
CERTIFICATE OF FILING AND SERVICE

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 29 June 2026.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, ^UCapt, ^UUSAF
Appellate Defense Counsel

A large black rectangular redaction box covering the contact information of Olga Stanford.

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.	)	
	)	
Staff Sergeant (E-5)	)	Before Panel No. 1
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	29 June 2026

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

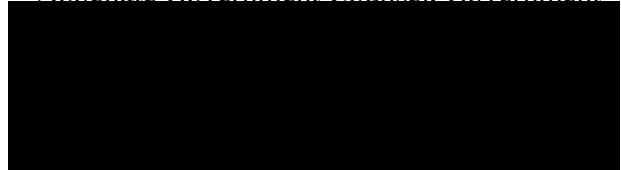
Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant 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 started 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.



REGINA HENENLOTTER, Maj, USAF
Appellate Government Counsel, Government

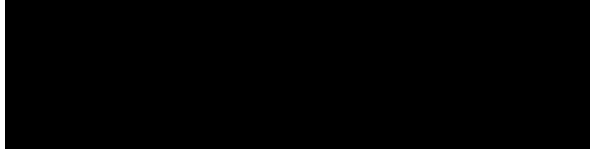


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 29 June 2026.



REGINA HENENLOTTER, Maj, USAF
Appellate Government Counsel, Government



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES	)	APPELLANT’S MOTION FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME
	)	(NINTH)
v.	)	
	)	Before Panel 1
Staff Sergeant (E-5)	)	
JACOB D. REID	)	No. ACM S32833
United States Air Force	)	
<i>Appellant.</i>	)	27 July 2026

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

Pursuant to Rules 23.3(m), 24.3(a)(1), and 24.3(b) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for his ninth enlargement of time, out of time, to file an Assignment of Error (AOE) brief. Appellant requests an enlargement for a period of 30 days, which will end on **5 September 2026**. This case was docketed with this Court on **10 September 2025**. From the date of docketing to the present date, 320 days have elapsed. On the date requested, 360 days will have elapsed.

On 20 May 2025, Appellant was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with his pleas, the military judge found Appellant guilty of service discrediting conduct, in violation of Article 134, Uniform Code of Military Justice, 10 U.S.C. § 934. R. at 23, 113. On 20 May 2025, the military judge sentenced Appellant to a bad conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or the sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action – United States v. Jacob D. Reid.

The record of trial is 640 pages, consisting of five appellate exhibits, four prosecut
d twenty-two defense exhibits. The transcript is 174 pages.

GRANTED

28 JULY 2026

Appellant is not confined.

Undersigned counsel is currently assigned thirty-nine cases; thirty-seven of those cases are pending before this Court (thirty-two are pending AOE). Within the next three weeks, undersigned counsel expects to file an answer brief in *United States v. Cunningham*, Misc. Dkt. No. 2026-06, an Article 62, UCMJ, 10 U.S.C. § 862, appeal.* Of the cases pending AOE, undersigned counsel has the following cases prioritized over the present case:

1. *United States v. Johnson*, ACM No. 25090 – The digital record of trial is 1506 pages, consisting of 27 appellate exhibits, 15 prosecution exhibits, and 17 defense exhibits. The transcript is 989 pages. Appellant is not confined. Based on her review of the record thus far, the undersigned counsel has identified one possible issue but has not yet identified all potential issues due to the ongoing substantive review of the record. Undersigned counsel has not begun drafting the AOE brief in this case. Based on the above-listed priorities, the undersigned counsel had to shift the expected completion date for this AOE brief from the end of August 2026 to the end of September 2026.
2. *United States v. Fowler*, ACM No. S32821 – The digital record of trial is 346 pages consisting of three appellate exhibits and four prosecution exhibits. The transcript is seventy-nine pages long. Appellant is not confined. Undersigned counsel has not substantively reviewed the record of trial.
3. *United States v. Tiexeira*, ACM No. 40831 – The digital record of trial is 1530 pages consisting of forty appellate exhibits, five prosecution exhibits, and fourteen defense

* In accordance with JT. R. APP. PROC. 20(d), undersigned counsel is required to give “priority over all other proceedings where practicable” to appeals filed pursuant to Article 62, UCMJ.

exhibits. The transcript is 146 pages long. Appellant is currently confined. Undersigned counsel has not substantively reviewed the record of trial.

4. *United States v. Marin*, ACM No. 40831 – The digital record of trial is 2287 pages, consisting of fifty-one appellate exhibits, sixteen prosecution exhibits, and sixteen defense exhibits. The transcript is 788 pages. Appellant is not confined. Undersigned counsel has not substantively reviewed the record of trial.
5. *United States v. Rice*, ACM No. 40851 – The digital record of trial is 610 pages, consisting of twenty appellate exhibits, three prosecution exhibits, eleven defense exhibits, and one court exhibit. The transcript is 234 pages. Appellant is not confined. Undersigned counsel has not substantively reviewed the record of trial.
6. *United States v. Taylor*, ACM No. S32831 – The digital record of trial is 864 pages, consisting of 8 appellate exhibits, 6 prosecution exhibits, 5 defense exhibits, and 2 court exhibits. The transcript is 168 pages. Appellant is not confined. Undersigned counsel has not substantively reviewed the record of trial.
7. *United States v. Banks*, ACM No. 40877 – The digital record of trial is 1331 pages, consisting of twelve appellate exhibits and six prosecution exhibits. The transcript is 97 pages. Appellant is not confined. Undersigned counsel has not substantively reviewed the record of trial.

Undersigned counsel's other duties include: timely communication with all clients via email and phone, planning and implementation of the upcoming training for onboarding Appellate Defense Division members, providing training and support to the Air Force Trial Defense Division (particularly in light of the Chief, Defense Counsel Assistance Program (DCAP), position remaining unfilled), and completing mandatory Air Force trainings and administrative measures.

Regarding undersigned counsel's progress with the subject case, through no fault of Appellant, undersigned counsel has not begun her substantive review of the record of trial. In preparing this motion for EOT, the undersigned counsel reviewed the following: EoJ, Convening Authority Decision on Action, pages from the record of trial referenced in this motion, and Appellate Exhibit III. Undersigned counsel has not yet identified any assignments of error. Undersigned counsel has not begun drafting the AOE brief. Due to the number of cases that have priority over the present case, undersigned counsel is unable to provide a realistic estimate of when the AOE brief will be filed.

Appellant has provided limited consent to disclose confidential communications, wherein:

- (1) Appellant was informed of his right to speedy appellate review.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) He asserts his right to speedy appellate review but, recognizing that undersigned counsel is working on other cases that hold a higher priority over Appellant's case, he agrees with this request for an enlargement of time.

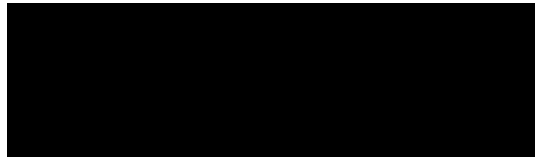
Through no fault of Appellant, undersigned counsel has been unable to begin substantive review of Appellant's record of trial. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise him regarding potential errors.

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

Respectfully submitted,

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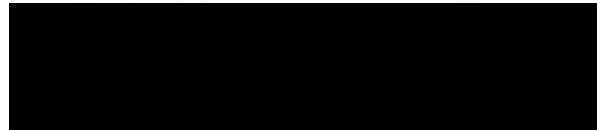
OLGA STANFORD, Capt, USAF
Appellate Defense Counsel

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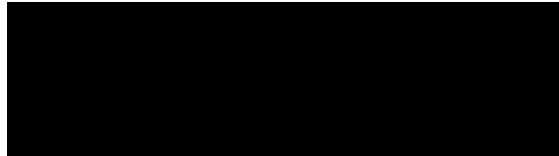
CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 27 July 2026.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, ^UCapt, ^UUSAF
Appellate Defense Counsel

A large black rectangular redaction box covering the contact information of Olga Stanford.

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.	)	
	)	
Staff Sergeant (E-5)	)	Before Panel No. 1
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	28 July 2026

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

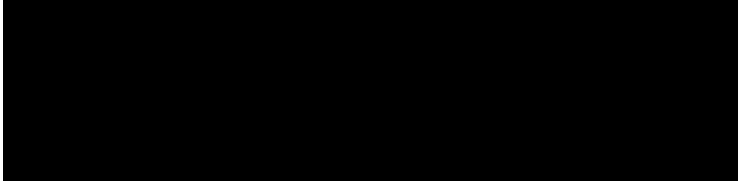
Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

The United States respectfully maintains that short of a death penalty case or other extraordinary circumstances, it should not take any appellant 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 started 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.



CATHERINE D. MUMFORD, Maj, USAF
Appellate Government Counsel

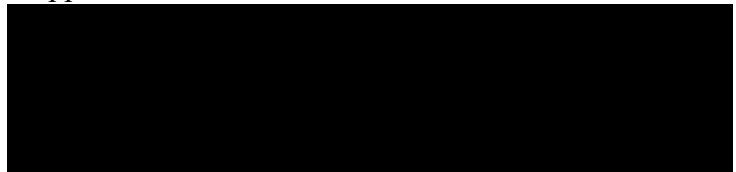


CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was delivered to the Court and to the Air Force
Appellate Defense Division on 28 July 2026.



CATHERINE D. MUMFORD, Maj, USAF
Appellate Government Counsel



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

UNITED STATES	)	No. ACM S32833
<i>Appellee</i>	)	
	)	
v.	)	
	)	ORDER
Jacob D. REID	)	
Staff Sergeant (E-5)	)	
U.S. Air Force	)	
<i>Appellant</i>	)	Panel 1

On 10 September 2025, Appellant’s case was docketed with this court, and on 26 October 2025, Appellant’s counsel entered her notice of appearance through the filing of the first motion for enlargement of time in this case. The current deadline for Appellant to file his assignments of error brief is 5 September 2026.

On 17 August 2026, counsel for Appellant submitted a Motion for Enlargement of Time (EOT) (Tenth), requesting an additional 30 days until 5 October 2026 to submit Appellant’s assignments of error brief. Counsel for Appellant avers that through “no fault of Appellant, undersigned counsel has not begun her substantive review of the record of trial,” and further asserts Appellant’s right to a speedy appellate review. On this same date, this panel received motions to enlarge time from the same counsel in three other appellate cases – *U.S. v. Marin*, No. ACM 40847 (Twelfth EOT); *U.S. v. Banks*, No. ACM 40877 (Tenth EOT); and *U.S. v. Tidwell*, No. ACM S32838 (Ninth EOT). Taken together, these four cases account for a total of 1,400 days of total delay as of the date of these filings; 341 days in this case alone.

The Government opposed the motion, noting that Appellant’s requested enlargement of time will result in 390 days of defense delay and contending that such delay should be reserved for “extraordinary circumstances.”

This court is concerned by the amount of delay accrued in this case, combined with the others cited above, attributed to filing an assignments of error brief.

Accordingly, it is by the court on this 19th day of August, 2026,

ORDERED:

Appellant’s Motion for Enlargement of Time (Tenth) is **GRANTED**. Appellant shall file any assignments of error not later than **5 October 2026**.

It is further ordered:

Given the number of enlargements of time granted thus far and Appellant's right to and assertion of speedy appellate review, Appellant's counsel is advised that, absent exceptional circumstances, no further enlargement of time will be granted.



FOR THE COURT



CAROL K. JOYCE
Clerk of the Court

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES	)	APPELLANT’S MOTION FOR
<i>Appellee</i>	)	ENLARGEMENT OF TIME
	)	(TENTH)
v.	)	
	)	Before Panel 1
Staff Sergeant (E-5)	)	
JACOB D. REID	)	No. ACM S32833
United States Air Force	)	
<i>Appellant.</i>	)	17 August 2026

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

Pursuant to Rules 23.3(m), 24.3(a)(1), and 24.3(b) of this Court’s Rules of Practice and Procedure, Appellant hereby moves for his tenth enlargement of time, out of time, to file an Assignment of Error (AOE) brief. Appellant requests an enlargement for a period of 30 days, which will end on **5 October 2026**. This case was docketed with this Court on **10 September 2025**. From the date of docketing to the present date, 341 days have elapsed. On the date requested, 390 days will have elapsed.

On 20 May 2025, Appellant was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with his pleas, the military judge found Appellant guilty of service discrediting conduct, in violation of Article 134, Uniform Code of Military Justice, 10 U.S.C. § 934. R. at 23, 113. On 20 May 2025, the military judge sentenced Appellant to a bad conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or the sentence. Record of Trial (ROT), Vol. 1, Convening Authority Decision on Action – United States v. Staff Sergeant Jacob D. Reid.

The digital record of trial is 640 pages, consisting of five appellate exhibits, four prosecution exhibits, and twenty-two defense exhibits. The transcript is 174 pages.

Appellant is not confined.

Undersigned counsel is currently assigned thirty-two cases; thirty of those cases are pending before this Court (twenty-seven are pending AOE's). This week, undersigned counsel expects to file an answer brief in *United States v. Cunningham*, an Article 62, UCMJ, 10 U.S.C. § 862, appeal pending docketing with this Court.* Within the next two months, undersigned counsel expects to file a writ of certiorari before the Supreme Court of the United States for one case. The cases described above have priority over Appellant's case. Of the cases pending AOE's, undersigned counsel has the following cases prioritized over the present case:

1. *United States v. Johnson*, ACM No. 25090 – The digital record of trial is 1506 pages, consisting of 27 appellate exhibits, 15 prosecution exhibits, and 17 defense exhibits. The transcript is 989 pages. Appellant is not confined. Based on her review of the record thus far, the undersigned counsel has identified five possible issues but has not yet identified all potential issues due to the ongoing substantive review of the record. Undersigned counsel has not begun drafting the AOE brief in this case. Based on the above-listed priorities, the undersigned counsel had to shift the expected completion date for this AOE brief from the end of August 2026 to the end of September 2026.
2. *United States v. Teixeira*, ACM No. 40831 – The digital record of trial is 1530 pages consisting of forty appellate exhibits, five prosecution exhibits, and fourteen defense exhibits. The transcript is 146 pages long. Appellant is currently confined. Undersigned counsel completed her review of the record of trial and identified three issues.

* In accordance with JT. R. APP. PROC. 20(d), undersigned counsel is required to give "priority over all other proceedings where practicable" to appeals filed pursuant to Article 62, UCMJ.

3. *United States v. Marin*, ACM No. 40831 – The digital record of trial is 2287 pages, consisting of fifty-one appellate exhibits, sixteen prosecution exhibits, and sixteen defense exhibits. The transcript is 788 pages. Appellant is not confined. Undersigned counsel has not substantively reviewed the record of trial.
4. *United States v. Rice*, ACM No. 40851 – The digital record of trial is 610 pages, consisting of twenty appellate exhibits, three prosecution exhibits, eleven defense exhibits, and one court exhibit. The transcript is 234 pages. Appellant is not confined. Undersigned counsel has not substantively reviewed the record of trial.
5. *United States v. Taylor*, ACM No. S32831 – The digital record of trial is 864 pages, consisting of 8 appellate exhibits, 6 prosecution exhibits, 5 defense exhibits, and 2 court exhibits. The transcript is 168 pages. Appellant is not confined. Undersigned counsel has not substantively reviewed the record of trial.
6. *United States v. Banks*, ACM No. 40877 – The digital record of trial is 1331 pages, consisting of twelve appellate exhibits and six prosecution exhibits. The transcript is 97 pages. Appellant is not confined. Undersigned counsel has not substantively reviewed the record of trial.

Undersigned counsel's other duties include: timely communication with all clients via email and phone, providing training and support to the Air Force Trial Defense Division (particularly in light of the Chief, Defense Counsel Assistance Program (DCAP), position remaining unfilled), and completing mandatory Air Force trainings and administrative measures.

Regarding undersigned counsel's progress with the subject case, through no fault of Appellant, undersigned counsel has not begun her substantive review of the record of trial. In preparing this motion for EOT, the undersigned counsel reviewed the following: EoJ, Convening

Authority Decision on Action, pages from the record of trial referenced in this motion, and Appellate Exhibit III. Undersigned counsel has not yet identified any assignments of error. Undersigned counsel has not begun drafting the AOE brief. Undersigned counsel anticipates beginning review of this record in October 2026. Based on the number of cases that have priority over the current case, undersigned counsel anticipates completing review of this case and drafting the assignment of error brief by the end of November 2026.

Appellant has provided limited consent to disclose confidential communications, wherein:

- (1) Appellant was informed of his right to speedy appellate review.
- (2) Appellant has been advised of this request for enlargement of time.
- (3) Appellant has been apprised of the status of undersigned counsel's progress on his case.
- (4) He asserts his right to speedy appellate review but, recognizing that undersigned counsel is working on other cases that hold a higher priority over Appellant's case, he agrees with this request for an enlargement of time.

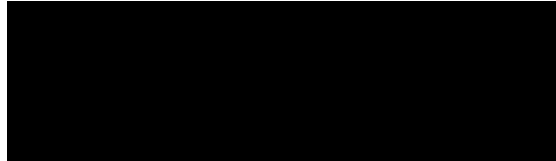
Through no fault of Appellant, undersigned counsel has been unable to begin substantive review of Appellant's record of trial. An enlargement of time is necessary to allow counsel to fully review Appellant's case and advise him regarding potential errors.

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

Respectfully submitted,

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OLGA STANFORD, Maj, USAF
Appellate Defense Counsel

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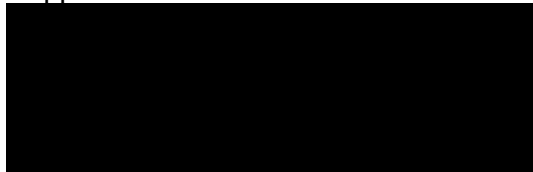
CERTIFICATE OF FILING AND SERVICE

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Government Trial and Appellate Operations Division on 17 August 2026.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, Maj, USAF
Appellate Defense Counsel

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IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

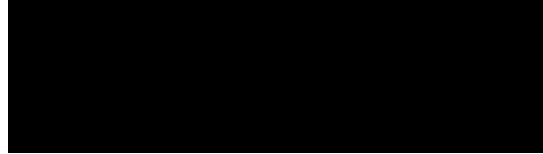
UNITED STATES,	)	UNITED STATES' OPPOSITION
<i>Appellee,</i>	)	TO APPELLANT'S MOTION FOR
	)	ENLARGEMENT OF TIME
v.	)	
	)	
Staff Sergeant (E-5)	)	Before Panel No. 1
JACOB D. REID,	)	
United States Air Force,	)	No. ACM S32833
<i>Appellant.</i>	)	
	)	18 August 2026

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

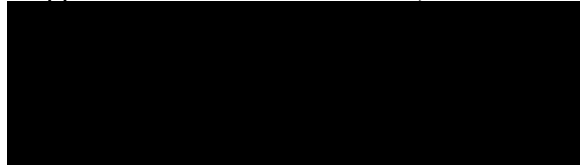
Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant's Motion for Enlargement of Time to file an Assignment of Error in this case.

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 390 days in length. Appellant's over a 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 started 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.

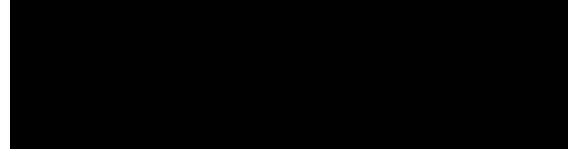


REGINA HENENLOTTER, Maj, USAF
Appellate Government Counsel, Government



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 August 2026.



REGINA HENENLOTTER, Maj, USAF
Appellate Government Counsel, Government



IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,	)	APPELLANT'S MOTION FOR LEAVE
	)	TO FILE AND MOTION TO STAY
	)	THE BRIEFING SCHEDULE
<i>Appellee,</i>	)	
	)	
v.	)	Before Panel 1
	)	
Staff Sergeant (E-5)	)	No. ACM S32833
JACOB D. REID,	)	
United States Air Force,	)	
<i>Appellant.</i>	)	15 September 2026

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

Appellant, Staff Sergeant (SSgt) Jacob D. Reid, pursuant to Rules 23.1 and 23.3 of this Honorable Court's Rules of Practice and Procedure, moves for leave to file a motion to stay the briefing schedule and moves to stay the briefing schedule.

PROCEDURAL HISTORY

On 20 May 2025, SSgt Reid was tried by a special court-martial consisting of a military judge alone at Fairchild Air Force Base, Washington. Record (R). at 1, 22. Consistent with SSgt Reid's pleas, the military judge found him guilty of service discrediting conduct (communicating indecent language to a law enforcement agent posing as a female under the age of sixteen years), in violation of Article 134, Uniform Code of Military Justice (UCMJ), 10 U.S.C. § 934. R. at 23, 113. This guilty plea was made pursuant to a plea agreement where SSgt Reid agreed to plead guilty to the above-referenced Article 134, UCMJ, specification and to "[w]aive all motions, which may be waived under the Rules for Courts-Martial (R.C.M.)." App. Ex. III at 1

7 plea agreement expressly stated that he "underst[ood]" that, pursuant to R.C.M. was not waiving "the right to challenge the jurisdiction of the court-martial." App.



Ex. III at 1.

DENIED
17 SEP 2026

In exchange, the Government withdrew and dismissed without prejudice one specification of attempt to commit a lewd act upon a child who had not attained the age of sixteen by communicating indecent language in violation of Article 80, UCMJ, 10 U.S.C. § 880.¹ App. Ex. III at 2. The prejudice is to ripen “upon completion of appellate review.” App. Ex. III at 2.

On 20 May 2025, the military judge sentenced SSgt Reid to a bad-conduct discharge, 4 months of confinement, and reduction to pay grade E-1. R. at 173. The convening authority took no action on the findings or the sentence. Convening Authority Decision on Action.

SSgt Reid’s brief is currently due to this Court no later than 5 October 2026.

Upon reviewing Appellant’s record, undersigned counsel found one issue—preemption. On 17 April 2026, this Court decided *United States v. Marschalek*, No. ACM S32776, 2026 CCA LEXIS 189 (A.F. Ct. Crim. App. Apr. 17, 2026). In *Marshalek*, this Court found that (1) “the Government was preempted from charging Appellant’s indecent exposure as indecent conduct in violation of Article 134, [UCMJ, 10 U.S.C. § 934],” and (2) “[a]n appellant’s ‘guilty plea neither forfeits nor waives the issue of preemption.” *Id.* at *7, *16 (quoting *United States v. Dominguez-Sandoval*, No. ACM 40084, 2022 CCA LEXIS 203, at *15 (A.F. Ct. Crim. App. Mar. 31, 2022) (unpub. op.)); *United States v. Robbins*, 52 M.J. 159, 160 (C.A.A.F. 1999).

On 16 June 2026, the Judge Advocate General for the Air Force (TJAG) certified the following questions to the Court of Appeals for the Armed Forces:

- I. Can an accused waive a claim of preemption under Article 134, UCMJ?
- II. Did the appellee waive his preemption claim through either his unconditional

¹ This specification was preferred on 3 January 2025. Charge Sheet. On 3 January 2025, the Government withdrew and dismissed without prejudice one specification of attempt to commit a lewd act upon a child who had not attained the age of sixteen by communicating indecent language in violation of Article 80, UCMJ, preferred on 15 November 2025. These specifications allege the same misconduct over the same time frame, and the 3 January 2025 specification appears to be a rewrite of the 15 November 2024 version. Charge Sheet.

guilty plea or the waive all waivable motions provision in his plea agreement, or both?

III. If appellee did not waive his preemption claim, was [the] Article 134, UCMJ, offense to which appellee pleaded guilty preempted by Article 120c, UCMJ, [10 U.S.C. § 920c] under a plain error standard or otherwise?

United States v. Marschalek, __ M.J. __, No. 26-0221/AF, 2026 CAAF LEXIS 517, at *1 (C.A.A.F. June 16, 2026).

The basis for this motion is that the CAAF’s decision in *Marschalek* will “likely have a significant effect on the ultimate disposition” of SSgt Reid’s case. *See Burford v. Monsanto Co.*, No. 4:16CV00536 PLC, 2016 U.S. Dist. LEXIS 92696, at *12–13 (E.D. Mo. July 18, 2016) (granting a stay “pending the resolution of [an appeal]” in a separate but factually related case pending at a higher court.). Therefore, SSgt Reid respectfully requests a stay in the briefing schedule until the CAAF issues a decision in *Marschalek*.

A STAY IS APPROPRIATE

A stay in this case is appropriate because it offers the most straight-forward path to resolution in SSgt Reid’s case, which is both fair to the parties to this case and is in the interest of judicial economy. “[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936). “A . . . court may, with propriety, find it is efficient for its own docket, and the fairest course for the parties to enter a stay of an action before it, pending resolution of independent proceedings which bear upon the case.” *Luna-Lara v. United States*, No. CV-16-01532-PHX-ROS (MHB), 2016 U.S. Dist. LEXIS 156666, at *9 (D. Ariz. Nov. 10, 2016) (quoting *Leyva v. Certified Grocers of California*, 593 F.2d 857, 863 (9th Cir. 1979)). As he is the “proponent of a stay,” SSgt Reid “bears the burden of establishing its need.” *Id.* (quoting *Clinton v. Jones*, 520 U.S. 681, 709 (1997)).

The decision from CAAF in *United States v. Marschalek*, USCA Dkt. No. 26-0221/AF, is likely to be case-dispositive for SSgt Reid. Like *Marschalek*, SSgt Reid also pleaded guilty to an indecent act in violation of Article 134, UCMJ, even though this alleged misconduct was already covered by an enumerated offense. In *Marschalek*, 2026 CCA LEXIS 189, at *3, the enumerated offense was indecent exposure in violation of Article 120c, UCMJ, whereas here a specification of indecent language communicated to a minor implicates Article 120b, 10 U.S.C. § 920b—a closely-related enumerated offense.²

The primary question when determining whether an enumerated offense has covered the entire field, is “whether Congress intended to limit prosecution for wrongful conduct within a particular area or field to offenses defined in specific articles of the Code.” *Robbins*, 52 M.J. at 161 (quoting *United States v. McGuinness*, 35 M.J. 149, 151–52 (C.M.A. 1992)); *United States v. Wright*, 5 M.J. 106, 110–11 (C.M.A. 1978). The intent of Congress may be discerned “through direct legislative language or express legislative history.” *United States v. Anderson*, 68 M.J. 378, 387 (C.A.A.F. 2010) (citing *United States v. Kick*, 7 M.J. 82, 85 (C.M.A. 1979); *United States v. Taylor*, 38 C.M.R. 393, 395 (C.M.A. 1968); *United States v. Taylor*, 30 C.M.R. 44, 45–47 (1960)). Where the elements of the offenses are essentially the same, there is “no need to delve into legislative history to ascertain anything further about the intent of Congress.” *Grijalva*, 84 M.J. at 439. “[T]he secondary question is whether the offense charged is composed of a residuum of elements of a specific offense.” *Robbins*, 52 M.J. at 161 (quoting *McGuinness*, 35 M.J. at 151–52); *Wright*, 5 M.J. at 110–11.

² This alleged misconduct would have been—and indeed initially was—charged as a violation of Article 80, UCMJ, because the person with whom SSgt Reid communicated was an undercover law enforcement agent. See Charge Sheet. However, the offense that would have been attempted is a violation of Article 120b, UCMJ.

That is the case here. The elements of indecent exposure under Article 120c, UCMJ, and the offense of which SSgt Reid was convicted are essentially the same:

Article 120b, UCMJ	Article 134, UCMJ Offense
That the accused committed a lewd act upon a child;	That accused engaged in certain conduct, to wit: communicating certain language to a child;
By communicating indecent language;	That the language was indecent;
That the communication was intentional.	That, under the circumstances, this conduct was of a nature to bring discredit upon the Armed Forces.

MCM, pt. IV, ¶¶ 62.a.(c), 62.a.(h)(5)(C); R. at 48. The first element of both offenses is communication with a minor. The second element of both offenses requires that the communication be indecent. When describing the second element of the offense SSgt Reid pleaded guilty to, the military judge used the definition nearly identical to the one found in the text of Article 120b, UCMJ. *Compare* R. at 49 (“Indecent language is that which is grossly offensive to modesty decency, or propriety, or shocks the moral sense because of its vulgar, filthy, or disgusting nature, or its tendency to incite lustful thought.” The military judge also noted that “[t]he language must violate community standards.”), *with* 10 U.S.C. § 120b(h)(5)(C) (“any indecent conduct . . . including via any communication technology, that amounts to a form of immorality relating to sexual impurity which is grossly vulgar, obscene, and repugnant to common propriety, and tends to excite sexual desire or deprave morals with respect to sexual relations”).

The only distinction between the elements of the two offenses is that Article 120b, UCMJ, required proof that SSgt Reid’s conduct was intentional and the offense he was convicted of required proof that his conduct was of a nature to bring discredit upon the armed forces. *See MCM*, pt. IV, para. 62.a.(c)), 104; R. at 49. For purposes of this Court’s preemption analysis, it does not consider the terminal element of Article 134, UCMJ. *United States v. Avery*, 79 M.J. 363, 367

(C.A.A.F. 2020). That leaves the intent element necessary to prove Article 120b, UCMJ, as the only material difference between the two offenses. In *Marschalek*, this Court found that, under these circumstances, the preemption doctrine applies. 2026 CCA LEXIS 189, at *16 (finding that “the Government was preempted from charging Appellant’s indecent exposure as indecent conduct in violation of Article 134, UCMJ,” because this Court “do[es] not consider the terminal element of Article 134, UCMJ,” and because the preemption doctrine’s purpose is to prevent the Government from lessening its evidentiary burden “by eliminating an essential element from a congressionally-established, enumerated offense”). That holding is now pending appeal at CAAF.

While SSgt Reid does not dispute that “even a defense-favorable decision [in *Marschalek*] will not automatically resolve the issue,” there is nonetheless “a substantial likelihood that it will clarify this important issue and, in so doing, will serve the interests of justice and the best interests of [all parties involved].” *United States v. McCurry*, No. 13-93 (DWF/FLN), 2018 U.S. Dist. LEXIS 116738, at *5 (D. Minn. July 13, 2018). Furthermore, Certified Issues I and II address the question of waiver and whether a guilty plea along with a “waive all waivable” motions provision waives the preemption issue. *Marschalek*, 2026 CAAF LEXIS 517, at *1. Because SSgt Reid also pleaded guilty and waived all waivable motions, R. at 88-92; App. Ex. III at 1, at a minimum, CAAF’s opinion in *Marschalek* will determine whether he can file an assignment of errors brief at all given that the sole issue identified in his case may be barred by waiver.

Broadly under *Landis*, there are two fundamental reasons for a court to grant a stay of proceedings: judicial efficiency and fairness. Both apply here. Regarding efficiency, because the facts in this case are so analogous to the *Marschalek* case, the natural consequence of this Court’s precedent from that case will result in the Appellant’s conviction being overturned. Another TJAG certification will follow as a trailer to *Marschalek* at CAAF. That is extensive briefing at this level,

staffing and coordination with TJAG, and further briefing at CAAF based on precedent that is subject to reversal in CAAF's upcoming term. If a stay is granted, none of that work based on questioned precedent will be necessary by any party. Rather, once CAAF decides *Marschalek*, the briefing and results in this case should become quite clear and, perhaps, uncontested. For a docket as onerous as the current one at this Court, avoiding unnecessary briefing and further appeals is quite economic for all parties.

Regarding fairness, the Appellant is faced with a high-stakes gamble based on the uncertainty of the legal questions at issue in *Marschalek*. On the one hand, this Court with *Marschalek* ruled in such a way that it appears the charge of which he stands convicted is no crime at all. However, by pursuing proper relief for this new precedent, he must risk his plea deal and with it the potential of being retried with a significantly more severe charge. It is fundamentally unfair that such a risk must be borne by an Appellant simply because his case falls in the window when case law directly on point to his appeal is temporarily unsettled.

To protect against this unfairness and to be more judicially efficient, Appellant seeks a stay of the current briefing schedule. Appellant seeks a stay in the briefing schedule until the CAAF issues a decision in *Marschalek*. Such request is supported by rulings from federal district and appellate courts, and should be granted. *E.g.*, *United States v. Courtway*, No. 18-cr-4687-DMS-1, 2023 U.S. Dist. LEXIS 226081, at *5 (S.D. Cal. Dec. 19, 2023) (granting a requested by the Government pending a decision from the Supreme Court of the United States on a case "raising the same issue"); *Longwood Pres. Holdings, LLC v. Commissioner*, No. 12421-19, 2022 U.S. Tax Ct. LEXIS 1043, at *1 (T.C. May 5, 2022) (granting a stay pending a decision from United States Court of Appeals for the Eleventh Circuit that would "address[] similar issues"); *McCurry*, 2018 U.S. Dist. LEXIS 116738, at *4 (granting a stay pending a decision in a different case because

there was “more than a slight likelihood that the Supreme Court’s decision [would] potentially affect and influence the analysis of the Minnesota robbery statute”); *Luna-Lara*, No. 2016 U.S. Dist. LEXIS 156666, at *9 (Granting a stay because “the Supreme Court decision in [another] case [would] be controlling authority on the issue raised by [p]etitioner,” and because “[t]he stay would be of limited duration as the Supreme Court has granted certiorari and the case will thus be heard during the Court’s October 2016 term, resulting in a decision by June, 2017.”).

CONCLUSION

SSgt Reid respectfully requests that this Honorable Court grant this motion and stay in the briefing schedule in his case until the CAAF issues a decision in *Marschalek*. He asks that this Court order any brief to be filed on his behalf no later than 30 days after the CAAF issues its opinion in *Marschalek* or 30 days after the CAAF’s resolution of any timely filed motion to reconsider, whichever occurs later.

Respectfully submitted,

GARRETT M. CONDON, Colonel, USAF
IMA to the Division Chief

OLGA STANFORD, Maj, USAF
Appellate Defense Counsel

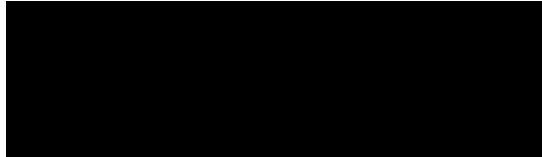
CERTIFICATE OF FILING AND SERVICE

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 15 September 2026.

Respectfully submitted,

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OLGA STANFORD, Maj, USAF
Appellate Defense Counsel

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

UNITED STATES	)	No. ACM S32833
<i>Appellee</i>	)	
	)	
v.	)	
	)	ORDER
Jacob D. REID	)	
Staff Sergeant (E-5)	)	
U.S. Air Force	)	
<i>Appellant</i>	)	Panel 1

On 19 September 2026, Appellant submitted a motion to withdraw from appellate review, along with a request to attach Appellant's DD Form 2330, *Waiver/Withdrawal of Appellate Rights in General and Special Courts-Martial Subject to Review by a Court of Criminal Appeals*, signed by Appellant and Appellant's counsel on 19 September 2026.

The Government did not file a response.

Accordingly, it is by the court on this 24th day of September, 2026,

ORDERED:

Appellant's Motion to Withdraw from Appellate Review and Attach is **GRANTED**. Appellant's case is forwarded to the Appellate Records Branch (JAJM) for further processing in accordance with Rules for Courts-Martial 1115(f)(3) and 1201, *Manual for Courts-Martial, United States* (2024 ed.).



FOR THE COURT

AGNIESZKA M. GAERTNER, Capt, USAF
Commissioner

IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS

UNITED STATES,	)	MOTION TO WITHDRAW
<i>Appellee,</i>	)	FROM APPELLATE REVIEW
	)	AND ATTACH
v.	)	
	)	Before Panel 1
Staff Sergeant (E-5)	)	
JACOB D. REID,	)	No. ACM S32833
United States Air Force,	)	
<i>Appellant.</i>	)	19 September 2026

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

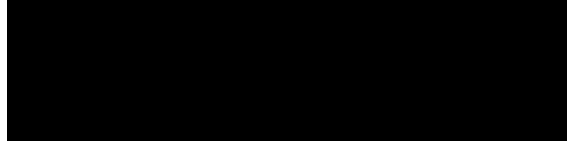
Pursuant to Rule 16 of this Honorable Court's Rules of Practice and Procedure and Rule for Courts-Martial (R.C.M.) 1115, Appellant, Staff Sergeant Jacob D. Reid, moves to withdraw his case from appellate review.

Appellant has fully consulted with Colonel Garrett M. Condon and Major Olga Stanford, his appellate defense counsel, regarding this motion to withdraw. No person has compelled, coerced, or induced Appellant to withdraw his case from appellate review by force, promises of clemency, or otherwise.

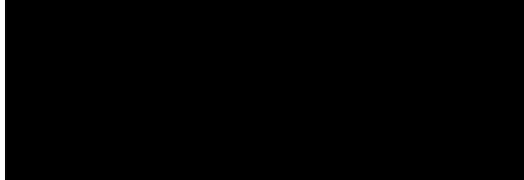
Further, pursuant to Rules 23(b) and 23.3(b) of this Honorable Court's Rules of Practice and Procedure, undersigned counsel asks this Court to attach the two-page document appended to this pleading to the record of this proceeding. The appended document, Appellant's completed DD Form 2330, *Waiver/Withdrawal 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 Honorable Court grant this motion to withdraw from appellate review and attach matters to the record.

Respectfully submitted,

A large black rectangular redaction box covering the signature of Olga Stanford.

OLGA STANFORD, Maj, USAF
Appellate Defense Counsel

A large black rectangular redaction box covering the contact information of Olga Stanford.

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 19 September 2026.

Respectfully submitted,

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OLGA STANFORD, Maj, USAF
Appellate Defense Counsel

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