

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

UNITED STATES	)	No. ACM 40602
<i>Appellee</i>	)	
	)	
v.	)	
	)	<b>ORDER</b>
Isaac R. LICEA	)	
Airman (E-2)	)	
U.S. Air Force	)	
<i>Appellant</i>	)	<b>Panel 1</b>

On 10 June 2024, 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 opposes the motion.

The court has considered Appellant's motion, the Government's opposition, case law, and this court's Rules of Practice and Procedure. Accordingly, it is by the court on this 12th day of June, 2024,

**ORDERED:**

Appellant's Motion for Enlargement of Time (First) is **GRANTED**. Appellant shall file any assignments of error not later than **21 August 2024**.

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



FLEMING E. KEEFE, Capt, USAF  
Deputy Clerk of the Court

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

UNITED STATES,	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (FIRST)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	10 June 2024
<i>Appellant.</i>	)	

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

Pursuant to Rule 23.3(m)(2) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his first enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 60 days, which will end on **21 August 2024**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 48 days have elapsed. On the date requested, 120 days will have elapsed.

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

Respectfully submitted,

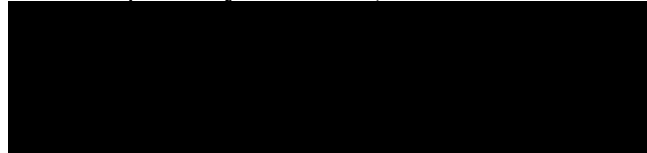


MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 10 June 2024.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

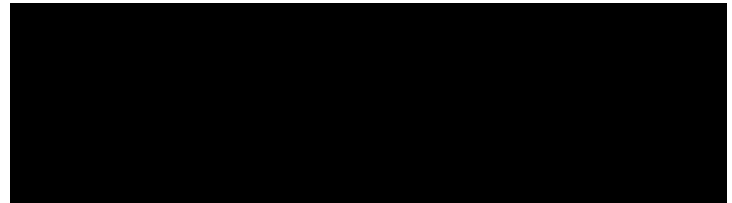
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Airman (E-2)	)	ACM 40602
ISAAC R. LICEA, USAF,	)	
<i>Appellant.</i>	)	Panel No. 1
	)	

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

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

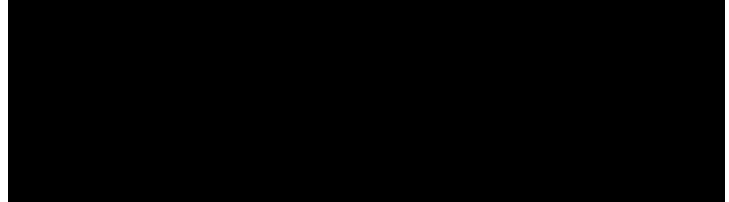
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



J. PETE FERRELL, Lt Col, USAF  
Director of Operations  
Government Trial and Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
(240) 612-4800

**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 11 June 2024.



J. PETE FERRELL, Lt Col, USAF  
Director of Operations  
Government Trial and Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
(240) 612-4800

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

<b>UNITED STATES,</b>	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (SECOND)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	14 August 2024
<i>Appellant.</i>	)	

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

Pursuant to Rule 23.3(m)(2) and (4) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his second enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **20 September 2024**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 113 days have elapsed. On the date requested, 150 days will have elapsed.

On 4 December 2023, Airman (Amn) Isaac R. Licea was convicted at a general court-martial convened at Minot Air Force Base, consistent with his pleas, of one charge and specification of child endangerment in violation of Article 119b, Uniform Code of Military Justice (UCMJ); and one charge and two specifications of domestic violence in violation of Article 128b, UCMJ. (R. at 73). The military judge sentenced Amn Licea to five years of confinement, reduction to the paygrade of E-1, and to be discharged from the service with a dishonorable discharge. (R. at 172). The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action).

The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court

exhibit. Amn Licea is currently in confinement. Amn Licea has been advised of his right to speedy appellate review, as well as this request for an enlargement of time. Amn Licea agrees to the request. Counsel has provided Amn Licea an update on the status of the case and its progress. Counsel asserts attorney-client privilege as to the substance of those conversations.

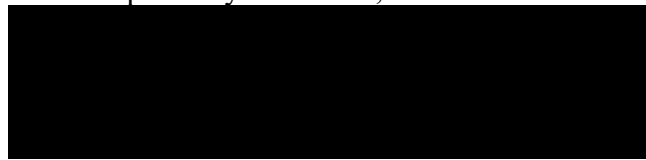
Undersigned counsel is currently assigned 20 cases; 13 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

- 1) *United States v. Hilton*, ACM 40500 – The record of trial consists of 15 volumes. The transcript is 2747 pages. There are 29 prosecution exhibits, 22 defense exhibits, two court exhibits, and 102 appellate exhibits. This case is on its tenth enlargement of time. Counsel has completed reviewing the record of trial and has begun drafting and assignment of errors.
- 2) *United States v. Martinez*, ACM 39903 (reh) – The record of trial from the remanded hearing consists of three volumes. The transcript is 134 pages. There are five prosecution exhibits, one defense exhibit, and 15 appellate exhibits. The record of trial from the initial trial consists of 11 prosecution exhibits, 24 defense exhibits, 81 appellate exhibits, and includes a 134 page transcript. This case is on its eighth enlargement of time. Counsel has completed an initial review of the remanded record of trial.
- 3) *United States v. Jenkins*, ACM S32765 – The record of trial consists of three volumes stored in electronic format. The transcript is 138 pages. There are four prosecution exhibits, one defense exhibit, four appellate exhibits, and one court exhibit. This case is in its sixth enlargement of time.

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

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

Respectfully submitted,



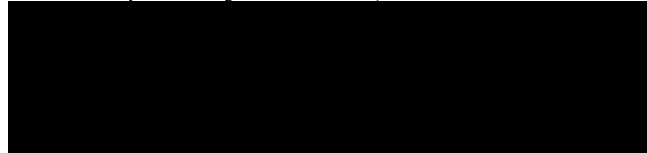
MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770



**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 14 August 2024.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

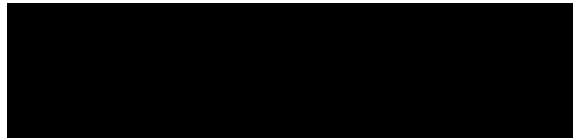
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Airman (E-2)	)	ACM 40602
ISAAC R. LICEA, USAF,	)	
<i>Appellant.</i>	)	Panel No. 1
	)	

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

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

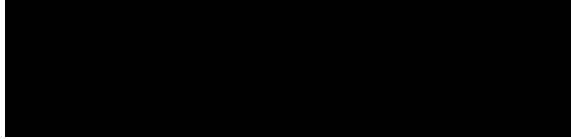
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



MARY ELLEN PAYNE  
Associate Chief, Government Trial and  
Appellate Operations Division  
Military Justice and Discipline  
United States Air Force  
(240) 612-4800

**CERTIFICATE OF FILING AND SERVICE**

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 15 August 2024.



MARY ELLEN PAYNE  
Associate Chief, Government Trial and  
Appellate Operations Division  
Military Justice and Discipline  
United States Air Force  
(240) 612-4800

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

<b>UNITED STATES,</b>	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (THIRD)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	12 September 2024
<i>Appellant.</i>	)	

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

Pursuant to Rule 23.3(m)(2) and (4) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his third enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **20 October 2024**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 142 days have elapsed. On the date requested, 180 days will have elapsed.

On 4 December 2023, Airman (Amn) Isaac R. Licea was convicted at a general court-martial convened at Minot Air Force Base, consistent with his pleas, of one charge and specification of child endangerment in violation of Article 119b, Uniform Code of Military Justice (UCMJ); and one charge and two specifications of domestic violence in violation of Article 128b, UCMJ. (R. at 73). The military judge sentenced Amn Licea to five years of confinement, reduction to the paygrade of E-1, and to be discharged from the service with a dishonorable discharge. (R. at 172). The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action).

The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court

exhibit. Amn Licea is currently in confinement. Amn Licea has been advised of his right to speedy appellate review, as well as this request for an enlargement of time. Amn Licea agrees to the request. Counsel has been in communication with Amn Licea concerning the status of the case and its progress, but does not have a substantive update at this time. Counsel asserts attorney-client privilege concerning those conversations.

Undersigned counsel is currently assigned 20 cases; 13 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

- 1) *United States v. Hilton*, ACM 40500 – The record of trial consists of 15 volumes. The transcript is 2747 pages. There are 29 prosecution exhibits, 22 defense exhibits, two court exhibits, and 102 appellate exhibits. This case is on its eleventh enlargement of time. Counsel has completed reviewing the record of trial and has begun drafting and assignment of errors.
- 2) *United States v. Martinez*, ACM 39903 (reh) – The record of trial from the remanded hearing consists of three volumes. The transcript is 134 pages. There are five prosecution exhibits, one defense exhibit, and 15 appellate exhibits. The record of trial from the initial trial consists of 11 prosecution exhibits, 24 defense exhibits, 81 appellate exhibits, and includes a 134 page transcript. This case is on its ninth enlargement of time. Counsel has completed an in-depth review of the record of trial and has begun drafting an assignment of errors.
- 3) *United States v. Jenkins*, ACM S32765 – The record of trial consists of three volumes stored in electronic format. The transcript is 138 pages. There are four prosecution exhibits, one defense exhibit, four appellate exhibits, and one court exhibit. This case is in its seventh enlargement of time.

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

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

Respectfully submitted,

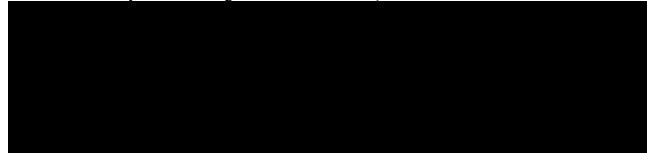


MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 12 September 2024.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
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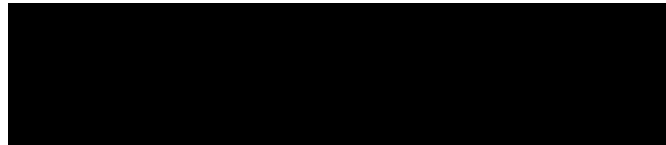
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Airman (E-2)	)	ACM 40602
ISAAC R. LICEA, USAF,	)	
<i>Appellant.</i>	)	Panel No. 1
	)	

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

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

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

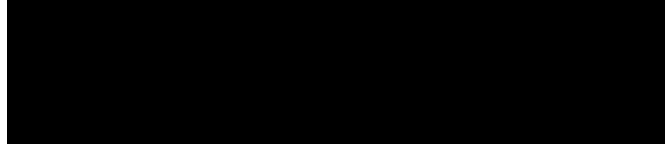


JENNY A. LIABENOW, Lt Col, USAF  
Director of Operations  
Government Trial and Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
(240) 612-4800



**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 13 September 2024.



JENNY A. LIABENOW, Lt Col, USAF  
Director of Operations  
Government Trial and Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
(240) 612-4800

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

<b>UNITED STATES,</b>	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (FOURTH)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	13 October 2024
<i>Appellant.</i>	)	

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

Pursuant to Rule 23.3(m)(2) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his fourth enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **19 November 2024**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 173 days have elapsed. On the date requested, 210 days will have elapsed.

On 4 December 2023, Airman (Amn) Isaac R. Licea was convicted at a general court-martial convened at Minot Air Force Base, consistent with his pleas, of one charge and specification of child endangerment in violation of Article 119b, Uniform Code of Military Justice (UCMJ); and one charge and two specifications of domestic violence in violation of Article 128b, UCMJ. (R. at 73). The military judge sentenced Amn Licea to five years of confinement, reduction to the paygrade of E-1, and to be discharged from the service with a dishonorable discharge. (R. at 172). The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action).

The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court

exhibit. Amn Licea is currently in confinement. Amn Licea has been advised of his right to speedy appellate review, as well as this request for an enlargement of time. Amn Licea agrees to the request. Counsel has been in communication with Amn Licea concerning the status of the case and its progress, but does not have a substantive update at this time. Counsel asserts attorney-client privilege concerning those conversations.

Undersigned counsel is currently assigned 20 cases; 13 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

- 1) *United States v. Hilton*, ACM 40500 – The record of trial consists of 15 volumes. The transcript is 2747 pages. There are 29 prosecution exhibits, 22 defense exhibits, two court exhibits, and 102 appellate exhibits. This case is on its twelfth enlargement of time. Counsel has completed reviewing the record of trial and has begun drafting and assignment of errors with civilian counsel.
- 2) *United States v. Martinez*, ACM 39903 (reh) – The record of trial from the remanded hearing consists of three volumes. The transcript is 134 pages. There are five prosecution exhibits, one defense exhibit, and 15 appellate exhibits. The record of trial from the initial trial consists of 11 prosecution exhibits, 24 defense exhibits, 81 appellate exhibits, and includes a 134 page transcript. This case is on its tenth enlargement of time. Counsel has nearly completed an assignment of errors.
- 3) *United States v. Jenkins*, ACM S32765 – The record of trial consists of three volumes stored in electronic format. The transcript is 138 pages. There are four prosecution exhibits, one defense exhibit, four appellate exhibits, and one court exhibit. This case is on its eighth enlargement of time.

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

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

Respectfully submitted,

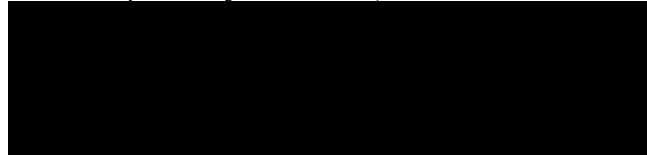


MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 13 October 2024.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

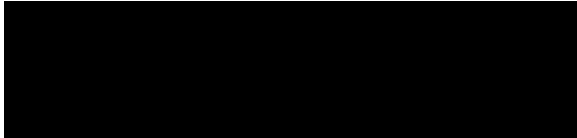
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Airman (E-2)	)	ACM 40602
ISAAC R. LICEA, USAF,	)	
<i>Appellant.</i>	)	Panel No. 1
	)	

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

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

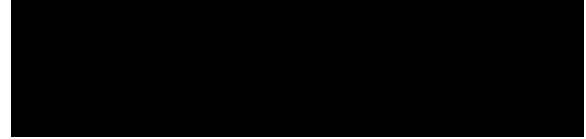
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



MARY ELLEN PAYNE  
Associate Chief, Government Trial and  
Appellate Operations Division  
Military Justice and Discipline  
United States Air Force  
(240) 612-4800

**CERTIFICATE OF FILING AND SERVICE**

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 16 October 2024.



MARY ELLEN PAYNE  
Associate Chief, Government Trial and  
Appellate Operations Division  
Military Justice and Discipline  
United States Air Force  
(240) 612-4800

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

UNITED STATES,	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (FIFTH)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	12 November 2024
<i>Appellant.</i>	)	

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

Pursuant to Rule 23.3(m)(2) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his fifth enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **19 December 2024**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 203 days have elapsed. On the date requested, 240 days will have elapsed.

On 4 December 2023, Airman (Amn) Isaac R. Licea was convicted at a general court-martial convened at Minot Air Force Base, consistent with his pleas, of one charge and specification of child endangerment in violation of Article 119b, Uniform Code of Military Justice (UCMJ); and one charge and two specifications of domestic violence in violation of Article 128b, UCMJ. (R. at 73). The military judge sentenced Amn Licea to five years of confinement, reduction to the paygrade of E-1, and to be discharged from the service with a dishonorable discharge. (R. at 172). The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action).

The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court



exhibit. Amn Licea is currently in confinement. Amn Licea has been advised of his right to speedy appellate review, as well as this request for an enlargement of time. Amn Licea agrees to the request. Counsel has been in communication with Amn Licea concerning the status of the case and its progress, but does not have a substantive update at this time. Counsel asserts attorney-client privilege concerning those conversations.

Undersigned counsel is currently assigned 20 cases; 11 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

- 1) *United States v. Hilton*, ACM 40500 – The record of trial consists of 15 volumes. The transcript is 2747 pages. There are 29 prosecution exhibits, 22 defense exhibits, two court exhibits, and 102 appellate exhibits. This case is on its thirteenth enlargement of time. Counsel has completed reviewing the record of trial and has begun drafting and assignment of errors.
- 2) *United States v. Jenkins*, ACM S32765 – The record of trial consists of three volumes stored in electronic format. The transcript is 138 pages. There are four prosecution exhibits, one defense exhibit, four appellate exhibits, and one court exhibit. This case is on its ninth enlargement of time.
- 3) *United States v. Titus*, ACM 40557 - The record of trial consists of four volumes. The transcript is 142 pages. There are five prosecution exhibits, five defense exhibits, 31 appellate exhibits, and five court exhibits. This case is on its eighth enlargement of time.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to finish reviewing the record of trial. Counsel's other priorities have prevented him from beginning in-depth work on this case. Counsel continues to work on an assignment of

errors in *United States v. Hilton* along with civilian counsel. Additionally, counsel is working to complete an assignment of errors in *United States v. Jenkins* without seeking any additional enlargements of time. Accordingly, an enlargement of time is necessary to allow undersigned counsel to fully review Appellant's case and advise Appellant regarding potential errors.

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

Respectfully submitted,

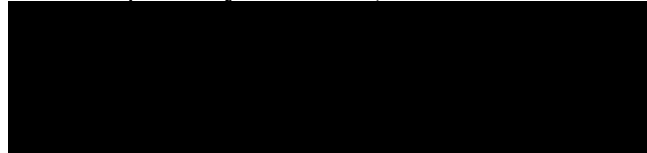


MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 12 November 2024.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

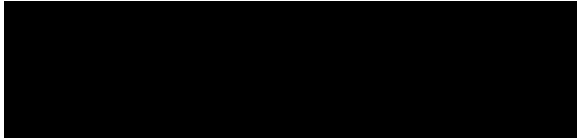
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Airman (E-2)	)	ACM 40602
ISAAC R. LICEA, USAF,	)	
<i>Appellant.</i>	)	Panel No. 1
	)	

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

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

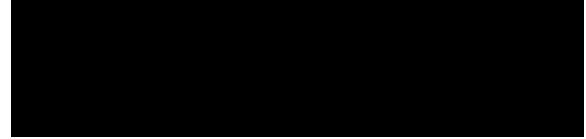
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



MARY ELLEN PAYNE  
Associate Chief, Government Trial and  
Appellate Operations Division  
Military Justice and Discipline  
United States Air Force  
(240) 612-4800

**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 13 November 2024.



MARY ELLEN PAYNE  
Associate Chief, Government Trial and  
Appellate Operations Division  
Military Justice and Discipline  
United States Air Force  
(240) 612-4800

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

<b>UNITED STATES,</b>	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (SIXTH)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	12 December 2024
<i>Appellant.</i>	)	

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

Pursuant to Rule 23.3(m)(2) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his sixth enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **18 January 2025**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 233 days have elapsed. On the date requested, 270 days will have elapsed.

On 4 December 2023, Airman (Amn) Isaac R. Licea was convicted at a general court-martial convened at Minot Air Force Base, consistent with his pleas, of one charge and specification of child endangerment in violation of Article 119b, Uniform Code of Military Justice (UCMJ); and one charge and two specifications of domestic violence in violation of Article 128b, UCMJ. (R. at 73). The military judge sentenced Amn Licea to five years of confinement, reduction to the paygrade of E-1, and to be discharged from the service with a dishonorable discharge. (R. at 172). The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action).

The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court

exhibit. Amn Licea is currently in confinement. Amn Licea has been advised of his right to speedy appellate review, as well as this request for an enlargement of time. Amn Licea agrees to the request. Counsel has been in communication with Amn Licea concerning the status of the case and its progress, but does not have a substantive update at this time. Counsel asserts attorney-client privilege concerning those conversations.

Undersigned counsel is currently assigned 20 cases; 11 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

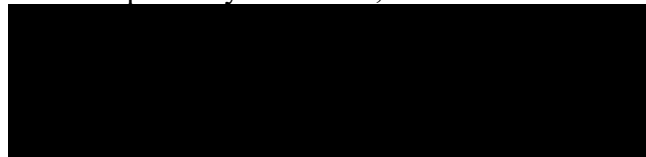
- 1) *United States v. Hilton*, ACM 40500 – The record of trial consists of 15 volumes. The transcript is 2747 pages. There are 29 prosecution exhibits, 22 defense exhibits, two court exhibits, and 102 appellate exhibits. This case is on its fourteenth enlargement of time. Counsel has been working an assignment of errors with civilian counsel.
- 2) *United States v. Titus*, ACM 40557 - The record of trial consists of four volumes. The transcript is 142 pages. There are five prosecution exhibits, five defense exhibits, 31 appellate exhibits, and five court exhibits. This case is on its ninth enlargement of time.
- 3) *United States v. Rodriguez*, ACM 40565 - The record of trial consists of two volumes. The transcript is 86 pages. There are two prosecution exhibits, six defense exhibits, and five appellate exhibits. This case is on its eighth enlargement of time.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters and has yet to complete an in-depth review of the record of trial. Counsel was occupied with the completion of an assignment of errors for *United States v. Jenkins*, which counsel worked on through the Thanksgiving weekend and submitted to this Court on 12 December 2024. Additionally, counsel has been working with civilian counsel in *United States v. Hilton*, which required him to dedicate time to coordinate the transmission of sealed exhibits. Counsel has had

to balance his work before this Court with other priorities before the Court of Appeals for the Armed Forces (CAAF). On 13 November 2024, counsel submitted a supplement for petition for review to the CAAF in *United States v. Bates*. This supplement addressed five issues. Additionally, counsel submitted a supplement for petition for review and a response to motion to dismiss to the CAAF in *United States v. Vargo* on 20 November 2024. Counsel worked through the weekend on 16 November 2024 in order to comply with the deadline set by the CAAF, while tending to a lingering illness that required him to go home from the office on multiple days. Additionally, counsel was on leave between 30 October 2024 and 5 November 2024. These circumstances and priorities have prevented counsel from being able to dedicate the time necessary for this case beyond a preliminary review. Accordingly, an enlargement of time is necessary to allow undersigned counsel to complete his review of the case and advise Appellant on potential errors.

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

Respectfully submitted,



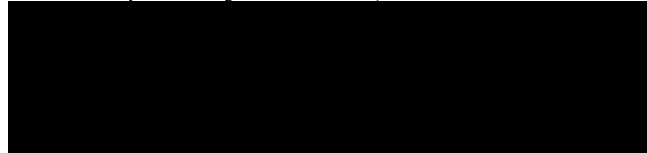
MICHAEL J. BRUZYK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770



**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 12 December 2024.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

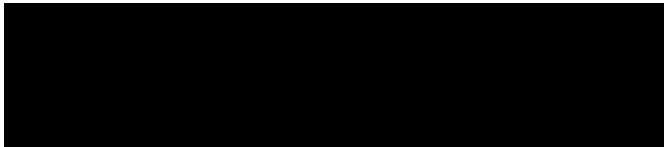
**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

UNITED STATES,	)	UNITED STATES' GENERAL
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Airman (E-2)	)	ACM 40602
ISAAC R. LICEA, USAF,	)	
<i>Appellant.</i>	)	Panel No. 1
	)	

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

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

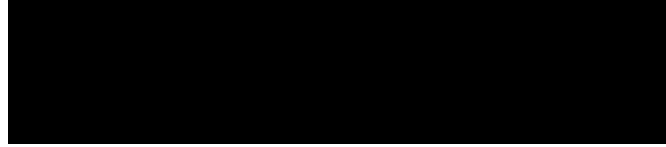
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



JENNY A. LIABENOW, Lt Col, USAF  
Director of Operations  
Government Trial and Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
(240) 612-4800

**CERTIFICATE OF FILING AND SERVICE**

I certify that a copy of the foregoing was delivered to the Court and to the Air Force Appellate Defense Division on 16 December 2024.



JENNY A. LIABENOW, Lt Col, USAF  
Director of Operations  
Government Trial and Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
(240) 612-4800

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

<b>UNITED STATES,</b>	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (SEVENTH)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	10 January 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)(2) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his seventh enlargement of time to file an Assignments of Error (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **17 February 2025**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 262 days have elapsed. On the date requested, 300 days will have elapsed.

On 4 December 2023, Airman (Amn) Isaac R. Licea was convicted at a general court-martial convened at Minot Air Force Base, consistent with his pleas, of one charge and specification of child endangerment in violation of Article 119b, Uniform Code of Military Justice (UCMJ); and one charge and two specifications of domestic violence in violation of Article 128b, UCMJ. (R. at 73). The military judge sentenced Amn Licea to five years of confinement, reduction to the paygrade of E-1, and to be discharged from the service with a dishonorable discharge. (R. at 172). The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action).

The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court

exhibit. Amn Licea is currently in confinement. Amn Licea has been advised of his right to speedy appellate review, as well as this request for an enlargement of time. Amn Licea agrees to the request. Counsel has been in communication with Amn Licea concerning the status of the case and its progress, but does not have a substantive update at this time. Counsel asserts attorney-client privilege concerning those conversations.

Undersigned counsel is currently assigned 20 cases; 10 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

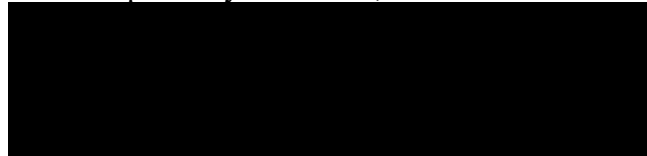
- 1) *United States v. Rodriguez*, ACM 40565 – The record of trial consists of two volumes. The transcript is 86 pages. There are two prosecution exhibits, six defense exhibits, and five appellate exhibits. This case is on its ninth enlargement of time.
- 2) *United States v. Sanger*, ACM S32773 – The record of trial consists of two electronic volumes. The transcript is 141 pages. There are four prosecution exhibits, one defense exhibit, and four appellate exhibits. This case is on its seventh enlargement of time.
- 3) *United States v. Licea*, ACM 40602 – This is the instant case.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters which has prevented him from completing an in-depth review of the record of trial. Counsel was occupied with the completion of an assignment of errors for *United States v. Jenkins*, which counsel worked on through the Thanksgiving weekend and submitted to this Court on 12 December 2024. Additionally, counsel worked through his leave over the Christmas holiday to complete work on an assignment of errors for *United States v. Hilton*, which was submitted to this Court on 27 December 2024. Counsel was also occupied with the completion of a supplement for petition for review for the Court of Appeals for the Armed Forces in *United States v. Scott* which was submitted on 7 January 2025, which counsel worked

on through the New Year holiday. Accordingly, an enlargement of time is necessary for counsel to continue reviewing the record of trial and to advise appellant on potential errors.

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

Respectfully submitted,

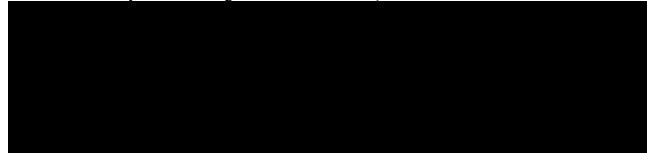


MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 10 January 2025.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

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

UNITED STATES,	)	UNITED STATES'
<i>Appellee,</i>	)	OPPOSITION TO APPELLANT'S
	)	MOTION FOR ENLARGEMENT
v.	)	OF TIME
	)	
Airman (E-2)	)	ACM 40602
ISAAC R. LICEA, USAF,	)	
<i>Appellant.</i>	)	Panel No. 1
	)	

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

Pursuant to Rule 23.2 of this Court's Rules of Practice and Procedure, the United States hereby enters its opposition to Appellant's Motion for Enlargement of Time 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 request is granted, the defense delay in this case will be 300 days in length. Appellant's nearly yearlong delay practically ensures this Court will not be able to issue a decision that complies with our superior Court's appellate processing standards. Appellant has already consumed almost two thirds of the 18-month standard for this Court to issue a decision, which only leaves about 8 months combined for the United States and this Court to perform their separate statutory responsibilities. It appears that Appellant's counsel has not completed review of the record of trial at this late stage of the appellate process.



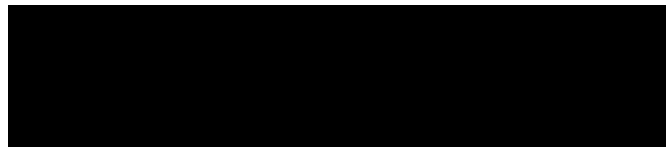
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



JENNY A. LIABENOW, Lt Col, USAF  
Director of Operations  
Government Trial and Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
(240) 612-4800

**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 14 January 2025.



JENNY A. LIABENOW, Lt Col, USAF  
Director of Operations  
Government Trial and Appellate Operations Division  
Military Justice and Discipline Directorate  
United States Air Force  
(240) 612-4800

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

<b>UNITED STATES,</b>	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (EIGHTH)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	10 February 2025
<i>Appellant.</i>	)	

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

Pursuant to Rule 23.3(m)(2) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his eighth enlargement of time to file an Assignment of Errors (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **19 March 2025**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 293 days have elapsed. On the date requested, 330 days will have elapsed.

On 4 December 2023, Airman (Amn) Isaac R. Licea was convicted at a general court-martial convened at Minot Air Force Base, consistent with his pleas, of one charge and specification of child endangerment in violation of Article 119b, Uniform Code of Military Justice (UCMJ); and one charge and two specifications of domestic violence in violation of Article 128b, UCMJ. (R. at 73). The military judge sentenced Amn Licea to five years of confinement, reduction to the paygrade of E-1, and to be discharged from the service with a dishonorable discharge. (R. at 172). The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action).

The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court

exhibit. Amn Licea is currently in confinement. Amn Licea has been advised of his right to speedy appellate review, as well as this request for an enlargement of time. Amn Licea agrees to the request. Counsel has been in communication with Amn Licea concerning the status of the case and its progress, but does not have a substantive update at this time. Counsel asserts attorney-client privilege concerning those conversations.

Undersigned counsel is currently assigned 20 cases; 9 cases are pending initial AOE's before this Court. Undersigned counsel's top priorities are as follows:

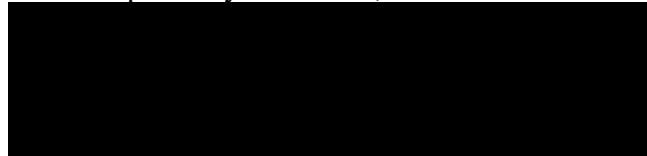
- 1) *United States v. Sanger*, ACM S32773 – The record of trial consists of two electronic volumes. The transcript is 141 pages. There are four prosecution exhibits, one defense exhibit, and four appellate exhibits. This case is on its ninth enlargement of time.
- 2) *United States v. Licea*, ACM 40602 – This is the instant case.
- 3) *United States v. Torres Gonzalez*, ACM 24001 - The record of trial consists of six volumes and a 608-page transcript. There are 46 prosecutions exhibits, eight defense exhibits, and 25 appellate exhibits. This case is on its seventh enlargement of time.

Through no fault of Appellant, undersigned counsel has been working on other assigned matters which have prevented him from completing an in-depth review of the record of trial. Counsel is occupied with the completion of a grant brief for *United States v. Cook* which is due for submission to the Court of Appeals for the Armed Forces on 19 February 2025. Following this, counsel must prepare for oral arguments before this Court in *United States v. Jenkins* on 5 March 2025. Concurrently with this, counsel is working towards completion of an assignment of errors for *United States v. Sanger*. After all of this is completed, the instant case will become counsel's top priority. However, these other priorities have prevented counsel from being able to dedicate the time necessary to work on this case. Accordingly, an enlargement of time is

necessary for counsel to continue reviewing the record of trial and to advise appellant on potential errors.

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

Respectfully submitted,

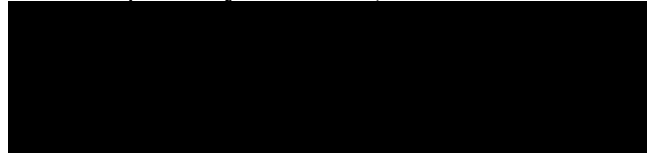


MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 10 February 2025.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

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

UNITED STATES,	)	UNITED STATES' OPPOSITION TO
<i>Appellee,</i>	)	APPELLANT'S MOTION FOR
	)	ENLARGEMENT OF TIME
v.	)	
	)	ACM 40602
Airman (E-2)	)	
ISAAC R. LICEA, USAF,	)	Panel No. 1
<i>Appellant.</i>	)	
	)	

**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 request is granted, the defense delay in this case will be 330 days in length. Appellant's nearly yearlong 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 completed review of the record of trial at this late stage of the appellate process.

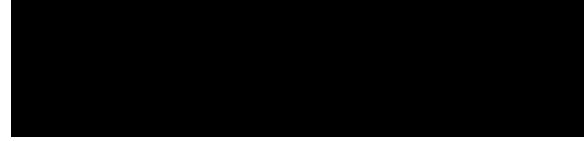
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



MARY ELLEN PAYNE  
Associate Chief, Government Trial and  
Appellate Operations Division  
Military Justice and Discipline  
United States Air Force  
(240) 612-4800

**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 12 February 2025.



MARY ELLEN PAYNE  
Associate Chief, Government Trial and  
Appellate Operations Division  
Military Justice and Discipline  
United States Air Force  
(240) 612-4800



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

<b>UNITED STATES,</b>	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (NINTH)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	12 March 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)(2) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his ninth enlargement of time to file an Assignment of Errors (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **18 April 2025**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 323 days have elapsed. On the date requested, 360 days will have elapsed.

On 4 December 2023, Airman (Amn) Isaac R. Licea was convicted at a general court-martial convened at Minot Air Force Base, consistent with his pleas, of one charge and specification of child endangerment in violation of Article 119b, Uniform Code of Military Justice (UCMJ); and one charge and two specifications of domestic violence in violation of Article 128b, UCMJ. (R. at 73). The military judge sentenced Amn Licea to five years of confinement, reduction to the paygrade of E-1, and to be discharged from the service with a dishonorable discharge. (R. at 172). The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action).

The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court

exhibit. Amn Licea is currently in confinement. Amn Licea has been advised of his right to speedy appellate review, as well as this request for an enlargement of time. Amn Licea agrees to the request. Counsel has been in communication with Amn Licea concerning the status of the case and its progress, but does not have a substantive update at this time. Counsel asserts attorney-client privilege concerning those conversations.

Undersigned counsel is currently assigned 18 cases; 7 cases are pending initial AOE's before this Court. Undersigned military counsel's top priorities before this Court are as follows:

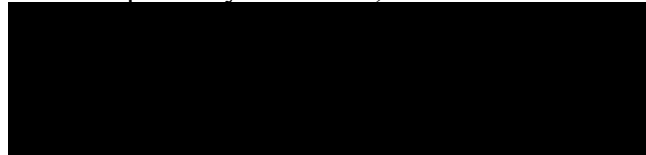
- 1) *United States v. Torres Gonzalez*, ACM 24001 – The record of trial consists of six volumes and a 608-page transcript. There are 46 prosecution exhibits, eight defense exhibits, and 25 appellate exhibits. This case is on its ninth enlargement of time
- 2) *United States v. Licea*, ACM 40602 – This is in the instant case.
- 3) *United States v. Quinones Reyes*, ACM 40636 – The record of trial consists of seven volumes with a 199-page transcript. There are four prosecution exhibits, 19 defense exhibits, 25 appellate exhibits, and one court exhibit. This case is on its sixth enlargement of time.

Through no fault of appellant, undersigned counsel has been working on other assigned matters and has been unable to complete an in-depth review of the record of trial. During the previous enlargement of time, counsel was occupied with the completion of a grant brief before the Court of Appeals for the Armed Forces in *United States v. Cook*, which counsel submitted on 19 February 2025. Counsel also submitted a reply brief to this Court in *United States v. Hilton* on 24 February 2025 and an assignment of errors to this Court for *United States v. Sanger* on 28 February 2025. Additionally, counsel was in preparation for oral arguments before this Court in *United States v. Jenkins* which was scheduled to take place on 5 March 2025. Counsel submitted

a supplemental brief in *United States v. Jenkins* on 12 March 2025. Counsel's top priority now is completion of an assignment of errors in *United States v. Torres Gonzalez*. Counsel has completed reviewing the record of trial in that case and has begun work on a written brief. Following completion of that, counsel will shift his focus towards this case. Accordingly, an enlargement of time is necessary for counsel to fully review Appellant's case and advise on potential errors.

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

Respectfully submitted,

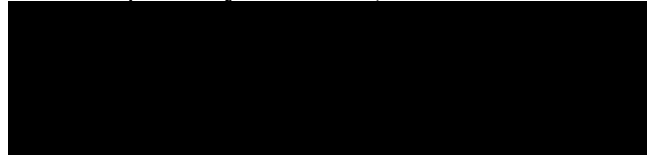


MICHAEL J. BRUZEK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 12 March 2025.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division  
United States Air Force  
(240) 612-4770

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

<b>UNITED STATES,</b>	)	UNITED STATES' OPPOSITION TO
<i>Appellee,</i>	)	APPELLANT'S MOTION FOR
	)	ENLARGEMENT OF TIME
v.	)	
	)	No. ACM 40602
Airman (E-2)	)	
<b>ISAAC R. LICEA, USAF,</b>	)	Before Panel No. 1
<i>Appellant.</i>	)	
	)	14 March 2025

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

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

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

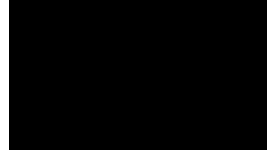
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



KATE E. LEE, Maj, USAF  
Appellate Government Counsel  
Government Trial & Appellate Operations  
1500 W. Perimeter Road, Suite 1190  
Joint Base Andrews, MD  
DSN: 612-4809

**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 14 March 2025.



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

<b>UNITED STATES,</b>	)	<b>MOTION FOR ENLARGEMENT OF</b>
<i>Appellee,</i>	)	<b>TIME (TENTH)</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2),	)	No. ACM 40602
<b>ISAAC R. LICEA,</b>	)	
United States Air Force,	)	11 April 2025
<i>Appellant.</i>	)	

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

Pursuant to Rule 23.3(m)(2) and (6) of this Honorable Court's Rules of Practice and Procedure, Appellant hereby moves for his tenth enlargement of time to file an Assignment of Errors (AOE). Appellant requests an enlargement for a period of 30 days, which will end on **18 May 2025**. The record of trial was docketed with this Court on 23 April 2024. From the date of docketing to the present date, 353 days have elapsed. On the date requested, 390 days will have elapsed.

On 4 December 2023, Airman (Amn) Isaac R. Licea was convicted at a general court-martial convened at Minot Air Force Base, consistent with his pleas, of one charge and specification of child endangerment in violation of Article 119b, Uniform Code of Military Justice (UCMJ); and one charge and two specifications of domestic violence in violation of Article 128b, UCMJ. (R. at 73). The military judge sentenced Amn Licea to five years of confinement, reduction to the paygrade of E-1, and to be discharged from the service with a dishonorable discharge. (R. at 172). The convening authority took no action on the findings or sentence. (Convening Authority Decision on Action).

The record of trial consists of seven electronic volumes, and the transcript is 173 pages. There are 12 prosecution exhibits, five defense exhibits, 22 appellate exhibits, and one court



exhibit. Amn Licea is currently in confinement. Amn Licea has been advised of his right to speedy appellate review, as well as this request for an enlargement of time. Amn Licea agrees to the request. Counsel has been in communication with Amn Licea concerning the status of the case and its progress. Counsel asserts attorney-client privilege concerning those conversations.

Undersigned counsel is currently assigned to represent eighteen service members; seven cases are pending initial AOE's before this Court. Undersigned counsel's priorities are as follows:

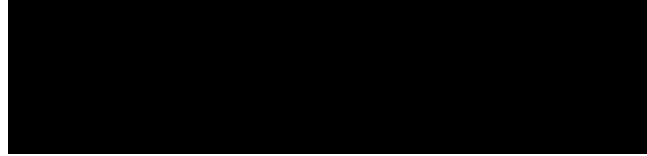
- 1) *United States v. Adams*, ACM 22018 – The record of trial consists of four volumes and a 299-page transcript. There are two prosecution exhibits, three defense exhibits, and seventeen appellate exhibits. This case is on its seventh enlargement of time. A brief is due to this Court on 16 April 2025.
- 2) *United States v. Torres Gonzalez*, ACM 24001 – The record of trial consists of six volumes and a 608-page transcript. There are 46 prosecutions exhibits, eight defense exhibits, and 25 appellate exhibits. This case is on its tenth enlargement of time. A brief is due to this Court on 28 April 2025, although counsel hopes to submit before then.
- 3) *United States v. Licea*, ACM 40602 – This is the instant case.
- 4) *United States v. Quinones Reyes*, ACM 40636 – The record of trial consists of seven volumes with a 199-page transcript. There are four prosecution exhibits, nineteen defense exhibits, twenty-five appellate exhibits, and one court exhibit. This case is on its seventh enlargement of time. A brief is due to this court on 21 April 2025.

Through no fault of appellant, undersigned counsel has been working on other assigned matters and has been unable to complete an in-depth review of the record of trial. Exceptional circumstances warrant an enlargement of time because on 21 March 2025 this Court denied

undersigned counsel's request for enlargement of time in *United States v. Copp*, ACM 24029 without explanation and without an opportunity to file a timely renewed request due to the 27 March 2025 filing deadline for an assignment of errors. This forced counsel to reorient all of his priorities to comply with the 27 March 2025 deadline. Before this, Counsel intended to complete assignments of error for both *United States v. Torres Gonzalez* and this case without asking for additional enlargements of time. However, that plan was no longer feasible. Since then, Counsel submitted an assignment of errors to this Court in *United states v. Copp* on 27 March 2025, a reply brief to the Court of Appeals for the Armed Forces in *United States v. Cook* on 2 April 2025, and a reply brief to this Court in *United States v. Sanger* on 7 April 2025. This week, counsel has been occupied finalizing assignments of error to submit to this Court in *United States v. Adams* and *United States v. Torres Gonzalez*. Following that, this case will become counsel's top priority. Counsel does not anticipate requesting additional enlargements of time. However, the reorientation of priorities based on this Court's denial of the request for enlargement of time in *United States v. Copp*, along with the constant deadlines that counsel has to work through since then necessitates an enlargement of time in this case. Without the enlargement, counsel will be severely hindered in his ability to zealously advocate for Amn Licea. Should this Court not be inclined to grant this motion, counsel respectfully requests a status conference.

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

Respectfully submitted,

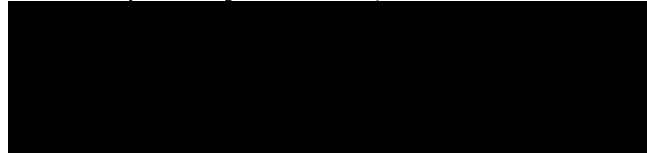


MICHAEL J. BRUZYK, Capt, USAF  
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**CERTIFICATE OF FILING AND SERVICE**

I certify that the original and copies of the foregoing were sent via email to the Court and served on the Appellate Government Division on 11 April 2025.

Respectfully submitted,



MICHAEL J. BRUZIK, Capt, USAF  
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**IN THE UNITED STATES AIR FORCE COURT OF CRIMINAL APPEALS**

<b>UNITED STATES,</b>	)	UNITED STATES'
	)	OPPOSITION TO
<i>Appellee,</i>	)	APPELLANT'S MOTION FOR
	)	ENLARGEMENT OF TIME
v.	)	
	)	Before Panel No. 1
Airman (E-2)	)	
<b>ISAAC R. LICEA,</b>	)	No. ACM 40602
United States Air Force.	)	
<i>Appellant</i>	)	15 April 2025

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

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

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

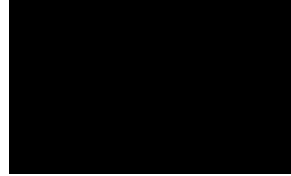
WHEREFORE, the United States respectfully requests that this Court deny Appellant's enlargement motion.



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Appellate Defense Division on 15 April 2025.



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

<b>UNITED STATES</b>	)	<b>MERITS BRIEF</b>
<i>Appellee</i>	)	
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2)	)	No. ACM 40602
<b>ISAAC R. LICEA</b>	)	
United States Air Force	)	Filed on: 19 May 2025
<i>Appellant</i>	)	

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

**Submission of Case Without Specific Assignment of Error**

The undersigned appellate defense counsel attests he has, on behalf of Appellant, carefully examined the record of trial in this case. Appellant does not admit the findings or sentence are correct in law and fact, but submits the case to this Honorable Court on its merits with no specific assignment of error.

Respectfully Submitted,



MICHAEL J. BRUZYK, Capt, USAF  
Appellate Defense Counsel  
Appellate Defense Division, AF/JAJA  
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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 Appellate and Trial Operations Division on 19 May 2025.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "J. Bruzik", is written over a light blue rectangular background.

██████████ J. BRUZYK, Capt, USAF  
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**UNITED STATES AIR FORCE  
COURT OF CRIMINAL APPEALS**

<b>UNITED STATES</b>	)	<b>No. ACM 40602</b>
<i>Appellee</i>	)	
	)	
<b>v.</b>	)	
	)	<b>ORDER</b>
<b>Isaac R. LICEA</b>	)	
<b>Airman (E-2)</b>	)	
<b>U.S. Air Force</b>	)	
<i>Appellant</i>	)	<b>Panel 1</b>

On 13 May April 2025, counsel for Appellant submitted a Motion to Examine Sealed Materials. Specifically, Appellant requests permission to examine the following materials sealed by the Preliminary Hearing Officer (PHO) during the preliminary hearing: PHO Exhibits 8, 10, 11 12, 13 and 21. The Government did not oppose Appellant’s request on the condition that they would be permitted to view the same materials in answering Appellant’s assignment of error.

Appellate counsel may examine sealed materials released to counsel at trial “upon a colorable showing . . . that examination is reasonably necessary to a proper fulfillment of the appellate counsel’s responsibilities.” R.C.M. 1113(b)(3)(B)(i).

The court has considered Appellant’s motion, the Government’s response, and this court’s Rules of Practice and Procedure. The court finds Appellant’s counsel has made a colorable showing that review of the sealed materials is necessary to fulfill counsel’s responsibilities.\*

Accordingly, it is by the court on this 19th day of May, 2025,

**ORDERED:**

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

Appellate defense counsel and appellate government counsel may view **PHO Exhibits 8, 10, 11, 12, 13 and 21**.

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

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\* However, we remind counsel to also include in their motion whether trial counsel and trial defense counsel were given the opportunity to view the requested sealed materials at trial. *See* A.F. Ct. Crim. App. R. 23.3(f).

Except as outlined in this order, no counsel will photocopy, photograph, or otherwise reproduce this material and will not disclose or make available its contents to any other individual without this court's prior written authorization.



FOR THE COURT



CAROL K. JOYCE  
Clerk of the Court

UNITED STATES ) APPELLANT'S MOTION TO  
*Appellee,* )  
 )  
 v. )  
 ) Before Panel No. 1  
 )  
 Airman (E-2) )  
**ISAAC R. LICEA,** ) No. ACM 40602  
 United States Air Force )  
*Appellant* ) 13 May 2025

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

Pursuant to Rule for Courts-Martial (R.C.M.) 1113(b)(3)(B)(i) and Rule 23.3(f)(1) of this Honorable Court's Rules of Practice and Procedure, undersigned counsel hereby moves to examine the following sealed items:

- Preliminary Hearing Officer (PHO) Exhibit 8 – Medicals Records re: A.L.’s Birth, various dates, nine pages
- PHO Exhibit 10 – A.L.’s Medical Records – Trinity Health, 30 Apr 20, twenty-three pages
- PHO Exhibit 11 – A.L.’s Medical Records – Sanford Medical Center Fargo – Pt. A, various dates, forty-two pages
- PHO Exhibit 12 – A.L.’s Medical Records – Sanford Medical Center Fargo – Pt. B, various dates, 37 pages
- PHO Exhibit 13 – Imaging of A.L. – Sanford Medical Center Fargo – 30 Apr 20, thirty-seven pages

- PHO Exhibit 21 – Annotated X-ray Images of A.L., various dates, eight pages

In accordance with R.C.M. 1113(b)(3)(B)(i), which requires a colorable showing that examining these materials is reasonably necessary to fulfill appellate counsel's responsibilities, undersigned counsel asserts that viewing the referenced materials is reasonably necessary to assess whether the record of trial is complete and whether trial defense counsel was effective during the preliminary hearing. The sealed portions raise the potential for appellate issues.

To determine whether the record of trial yields grounds for this Court to grant relief under Article 66(d), UCMJ, 10 U.S.C. § 866(d), appellate defense counsel must examine "the entire record."

Although Courts of Criminal Appeals have a broad mandate to review the record unconstrained by an appellant's assignments of error, that broad mandate does not reduce the importance of adequate representation. As we said in *United States v. Ortiz*, 24 M.J. 323, 325 (C.M.A. 1987), independent review is not the same as competent appellate representation.

*United States v. May*, 47 M.J. 478, 481 (C.A.A.F. 1998). Undersigned counsel must review the sealed materials to provide "competent appellate representation." *See id.* Accordingly, good cause exists in this case since undersigned counsel cannot fulfill his duty of representation under Article 70, UCMJ, 10 U.S.C. § 870, without first reviewing these exhibits.

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

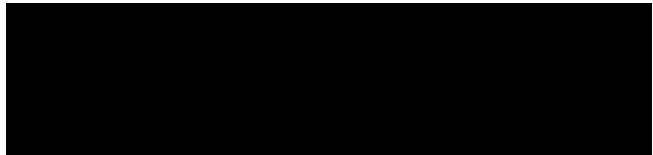
Respectfully submitted,



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

<b>UNITED STATES,</b> <i>Appellant,</i>	)	<b>UNITED STATES’</b>
	)	<b>RESPONSE TO APPELLANT’S</b>
	)	<b>MOTION TO EXAMINE</b>
	)	<b>SEALED MATERIALS</b>
	)	
v.	)	Before Panel No. 1
	)	
Airman (E-2)	)	No. ACM 40602
<b>ISAAC R. LICEA</b>	)	
United States Air Force	)	14 May 2025
<i>Appellee.</i>	)	

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

The United States responds pursuant to Rule for Courts-Martial (R.C.M.) 1113(b)(3)(B) and Rules 3.1 and 23.3(f) of this Honorable Court’s Rules of Practice and Procedure. The United States does not object to Appellant’s counsel reviewing any materials listed in Appellant’s motion that were viewed by all parties at trial, on the condition that the United States is permitted to view the same materials in answering Appellant’s assignments of error.

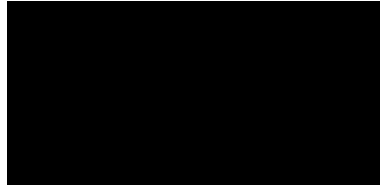
The United States would not consent to Appellant’s counsel viewing any exhibits that were reviewed in camera but not released to the parties unless this Court has first determined there is good cause for Appellant’s counsel to do so under R.C.M. 1113.

The United States agrees that in accordance with R.C.M. 1113(b)(3)(B)(i), appellate defense counsel has made a colorable showing that examination of these materials is reasonably necessary to appellate counsel’s responsibilities. But review of the referenced appellate exhibits is also necessary for the appellate government counsel to conduct a complete review of the record and to advocate competently on behalf of the United States in response to Appellant’s

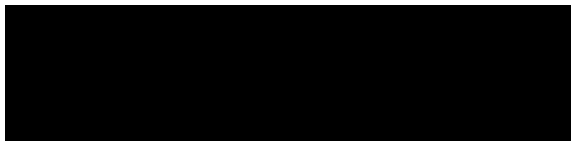


assignments of error. The United States respectfully requests that any order issued by this Court also allow counsel for the United States to view the sealed materials.

**WHEREFORE**, undersigned counsel respectfully requests that this Honorable Court grant Appellant's motion with the United States' requested conditions.



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Government Trial and Appellate Operations Division  
Military Justice and Discipline Directorate  
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MARY ELLEN PAYNE  
Associate Chief  
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