



Work-Product

**UNITED STATES AIR FORCE  
BOARD FOR CORRECTION OF MILITARY RECORDS**

**RECORD OF PROCEEDINGS**

**IN THE MATTER OF:**

Work-Product

**DOCKET NUMBER:** BC-2022-02990

**COUNSEL:** NONE

**HEARING REQUESTED:** YES

**APPLICANT’S REQUEST**

1. His discharge from the Work-Product Air National Guard Work-...ANG) be changed to honorable.
2. He be transferred to the Retired Reserve and furnished a retirement certificate.
3. He be given a Medical Evaluation Board (MEB) to determine his percentage for military disability retirement pay and he receive all back pay and benefits starting in 2013.
4. His security clearance be restored (Outside the Board’s Purview – since the applicant is discharged, he would wait until he gets a new employer (i.e., government, contractor, or industry) and the new employer would submit the proper paperwork to have his clearance reinstated).
5. He receive Special Section Board (SSB) consideration for promotion to Brigadier General (O-7); or in the alternative, be federally promoted and retired in the grade of O-7 (Outside the Board’s Purview – The Secretary of the Air Force (SAF) has no jurisdiction over the decisions made by the state’s governor).
6. His Officer Performance Reports (OPR) be corrected and/or accomplished.
7. His debarment order from the Work-...ANG base be removed.
8. The fraudulent debt charged to his bankruptcy estate in the amount of \$686,503.96 be corrected and he be reimbursed for lost pay.

**APPLICANT’S CONTENTIONS**

He was investigated for 5 years for 23 false allegations with no evidence in his records that supported these charges. These false allegations were a reprisal against him for being a whistleblower and testifying in military and civilian equal opportunity cases. These cases included allegations of fraud, military contracts for fraud and conflict of interest, prohibited personnel actions, White Supremacy within units, sexual misconduct, and improprieties within the Work-...ANG. He incurred a \$686,503.96 debt which led him to file bankruptcy. The debt incurred was due to

his active duty orders being revoked to which he was told were not authorized or approved which started in 2006, and his wrongful termination from his technician's position. He tried to correct this debt through numerous channels to no avail. Due to the bankruptcy filing and the false allegations, his security clearance was revoked and his promotion to O-7 was denied, and he was ultimately barred from the base and discharged with a general service characterization. His favorable OPRs were lost and not filed in his records for six years, from 2007 thru 2012 and his referral OPR from 2013 was based on false allegations. His paperwork for retirement was not processed properly and his general discharge for reason of resignation was not valid as he never agreed to waive his rights to a board nor did he resign. Additionally, he was recommended for a MEB by his base medical unit but this was ultimately denied by the National Guard Bureau (NGB) which was based off his commander's recommendation to be returned to duty (RTD). This commander recommendation contained false information regarding his medical issues. He is currently rated by the Department of Veterans Affairs (DVA) at 100 percent disabled.

To support his contentions, the applicant submitted numerous documents and copies of email conversations relating to the adverse actions taken against him along with AFI excerpts and his DVA disability rating. He also included his bankruptcy records and the Equal Employment Opportunity Commission case files.

The applicant's complete submission is at Exhibit A.

## **STATEMENT OF FACTS**

The applicant is a former Air National Guard colonel (O-6).

On 19 May 04, ARPC/DPPR sent the applicant the standard Notification of Eligibility for retired pay (20-year letter) informing him he has completed the required years under the provisions of Title 10 U.S.C., Section 12731 and is entitled to retired pay upon application prior to age 60.

On 9 Feb 05, AF IMT 348, *Line of Duty Determination*, indicates the applicant's injury to both of his shoulders while deployed was found in the line of duty (ILOD) to which the appointing authority concurred on 25 Feb 05.

On 2 Nov 05, AF IMT 707A, *Field Grade Officer Performance Report (Maj thru Col)*, indicates the applicant was rated as meets standards for the reporting period of 15 Jun 04 thru 14 Jun 05. The report notes the applicant as a superb leader and outstanding aviator with the highest degree of professionalism. It goes on to note he is overdue for increased responsibility and promotion.

On 20 Dec 05, AF IMT 707A indicates the applicant was rated as meets standards for the reporting period of 15 Jun 05 thru 7 Nov 05. The report notes the applicant as an outstanding leader, success driven, highly motivated and the most ethical officer in the Operations Group. It goes on to state he was recently selected as the Mission Support Group Commander and ready for increased duties.

On 22 Dec 06, AF IMT 707A indicates the applicant was rated as meets standards for the reporting period of 8 Nov 05 thru 7 Nov 06. The report notes the applicant as a highly effective commander,

highly motivated and inspirational. It goes on to state he is integral to the future of the unit and is ready for immediate increase in duties.

On 2 Dec 07, the applicant was appointed the commander of the

Work-Product

On 30 Sep 08, DD Form 214, *Certificate of Release or Discharge from Active Duty*, reflects the applicant was honorably discharged in the grade of colonel (O-6) after serving two years and four months of active duty for this period. He was discharged, with a narrative reason for separation "Completion of Required Active Service."

On 20 Jan 11, AF Form 77, *Letter of Evaluation*, indicates no report was available nor required per AFI 36-2406, *Officer and Enlisted Evaluation Systems*, for the period of 8 Nov 06 thru 19 Feb 10.

On 23 Dec 11, NGB/JA conducted a legal review of the Command Directed Evaluation (CDI), report provided by the applicant, and found it legally sufficient for forwarding to the Appointing Authority for action noting the majority of the allegations and the substantiated misconduct occurred while the applicant was in a state status. The report found allegations one through six and nine were supported by a preponderance of the evidence and the conclusions reached were consistent with the findings; however, substantiation of allegations seven and eight were not legally supported.

On 17 Jul 12, the applicant's commander recommended the applicant be discharged from the Air Force, under the provisions of AFI 36-3209, *Separation and Retirement Procedures for Air National Guard and Air Force Reserve Members*, paragraphs 2.29.2, 2.29.4, 2.29.5, and 2.34.1 for mismanagement of government affairs, other serious or recurring misconduct that raises doubt regarding fitness for retention in the Air Force, intentional misrepresentation of facts in obtaining an appointment or in official statement of records, and failure to show acceptable qualities of leadership required of an officer of the same grade (provided by the applicant).

The specific reasons for the action were outlined in the CDI dated 1 Nov 11, which substantiated the following allegations:

1. On or about 8 Nov 05 thru 2 Dec 07, the applicant abused his authority and position by obtaining Military Personnel Appropriation (MPA) days without a requirement or authorization but rather for personal benefit.
2. On or about 2 Dec 07 thru 6 Nov 09, the applicant abused his authority and position by obtaining Military Personnel Appropriation (MPA) days without a requirement or authorization but rather for personal benefit.
3. On or about 8 Nov 05 thru 6 Nov 09, the applicant committed fraud, waste, and abuse of federal funds by obtaining MPA days for personal benefit when no such duties were required or approved.

4. On or about 8 Nov 05 thru 6 Nov 09, the applicant was derelict in the performance of his duties by failing to obtain approval for his Title 10 orders.
5. On or about 8 Nov 05 thru 6 Nov 09, the applicant made false official statements with the intent to deceive stating there was a valid requirement for the Title 10 mission when no such duties were officially required or approved.
6. On or about 7 Jan 05 thru 20 Jun 05, on or about 22 Jul 08 thru 30 Sep 08, and on or about 19 Aug 09 thru 1 Oct 09, the applicant violated the Dual Compensation Act by improperly simultaneously receiving both Title 32 Technician pay and Title 10 Active Duty pay.
7. On or about 2 Dec 07 thru 6 Nov 09, the applicant made false statements and or falsely represented himself as the Wor... ANG Wing commander with intent to deceive.
8. On or about 8 Nov 05 thru 6 Nov 09, the applicant was derelict in his duties by failing to advise of his Title 10 status and consequential relief from Title 32 command and failing not to take Title 32 command actions while in Title 10 status.
9. On or about 8 Nov 05 thru 6 Nov 09, the applicant engaged in conduct unbecoming an officer by asserting a requirement to perform Title 10 duties when no such duties were required or approved.

Further reasons for the action were also outlined in the CDI dated 28 Oct 09, which substantiated the following allegations failing to notify leadership in a timely manner of certain members carrying the Nazi flag guidon; failing to advise leadership of a member wearing a mock German World War I helmet; and being unaware of the requirement to report the guidon incident through the Commander's Critical Information Requirement (CCIR) system.

Further reasons for the action were also outlined in the Internal Review Department, United States Property and Fiscal Office (USP&FO) dated 21 Feb 12, which concluded his actions of placing himself in Title 10 status without proper approval resulting in receiving additional retirement benefits and additional pay and allowances, which he would not have received or been entitled to, had he not been in Title 10 status and been properly performing assigned Title 32 duties.

Additionally, further reasons were outlined in a memorandum, dated 19 Feb 10, regarding the Nazi and German issues outlined above; failing to notify leadership of his temporary duties (TDY) and who was left in charge during his absence; failure to advise of a high profile politician's visit; continuing intransigence and obstinacy instead of teamwork; lack of response on funding request to address cultural sensitivity training; allowing culture to develop with regards to Nazi symbols; and systematic base-wide problems such as the Government Purchase Card (GPC) audit.

Lastly, reasons for the action were also outlined in the Internal Review Department, USP&FO dated 8 Oct 09, which revealed transactions occurring involving potential legal and regulatory violations with recommendations to which he failed to respond or reply to the recommendations.

On 5 Nov 13, the applicant through his legal counsel, submitted a letter (provided by the applicant), to his command waiving his rights to an administrative discharge board in lieu of a service characterization no lower than general; a retirement grade no lower than lieutenant colonel (O-5); the outstanding pay/debt issues relating to his Title 10/Title 31 Technician pay be fully determined with an amount owed established before separation; any and all potential basis for administrative separation or sanction that exists will be considered disposed of by way of his in lieu of acceptance; and the outstanding Security Information File (SIF) which is currently being adjudicated by the Air Force Central Adjudication Facility (AFCAF), if not done already, be withdrawn.

On 21 Jun 14, AF IMT 707, *Officer Performance Report (Lt thru Col)*, indicates the applicant was rated as meets standards for the reporting period of 20 Feb 11 thru 19 Feb 12. The report only has one note regarding the applicant's performance stating he attended required duty assignments during the reporting cycle. The report also notes his rater retired prior to completing the OPR process.

On 18 Jul 14, AF IMT 707 indicates the applicant was rated as meets standards for the reporting period of 20 Feb 10 thru 19 Feb 11. The report only has one note regarding the applicant's performance stating he attended required duty assignments during the reporting cycle. The report also notes his rater retired prior to completing the OPR process.

On 27 Oct 14, the adjutant general (TAG) sent a letter to the applicant outlining the concerns expressed by the applicant and his reasoning and decision for the actions taken by the state concerning his appeal of his discharge characterization (provided by the applicant). In this letter it is stated the administrative discharge was based largely on the particulars of the Command Directed Investigation outlined in the report dated 1 Nov 11. Furthermore, the letter states the applicant would be discharged with a general discharge in the grade of colonel; there were only nine substantiated allegations levied against him per the CDI conducted in Nov 11; the Work-P... USP&FO was directed by the National Guard Bureau (NGB) to access a debt associated with the illegally acquired Title 10 orders; and he had the opportunity to move the decision outside of the National Guard's influence; however, chose not to by withdrawing his review in lieu of (RILO) package to SAF and signing a settlement agreement through his military defense counsel. All investigations were complete, and he would be discharged with a general service characterization in the grade of colonel.

On 31 Oct 14, NGB Form 22, *National Guard Bureau Report of Separation and Record of Service*, reflects the applicant was honorably discharged from the Air National Guard in the grade of colonel (O-6) after serving 30 years, 9 months, and 14 days of total service for retired pay. He was discharged, with a narrative reason for separation "Resignation Resulting in General Discharge."

Dated 5 Nov 14, Special Order [Work-Product] indicates the applicant was discharged with a general service characterization from the [Work-Product] effective 31 Oct 14.

On 1 Feb 19, DD Form 2656, *Data for Payment of Retired Personnel*, indicates the applicant applied for Reserve Component retired pay.

Dated 1 Jul 19, Reserve Order [Work-Product] indicates the applicant was authorized retired pay per 10 U.S.C. Section 12731 in the grade of colonel (O-6), effective 8 May 19 and was placed on the Reserve Retired List (RRL).

On 27 Nov 19, Reserve Order [Work-Product] rescinded Reserve Order [Work-Product]

For more information, see the excerpt of the applicant's record at Exhibit B and the advisories and Exhibits C, D, E, and F.

## AIR FORCE EVALUATION

NGB/SGP recommends denying the applicant's request for a medical retirement finding no evidence of an error or injustice. The applicant went through the Non-Duty Disability Evaluation System (NDDDES) process and was returned to duty with an Assignment Limitation Code (ALC) of C3. There was no medical documentation indicating the applicant had outstanding medical issues restricting him from any type of duty, mobility or fitness restrictions nor limiting him to perform his duties of his office, grade and rank/rating prior to separating from the [Work-Product] Air National Guard on 31 Oct 14. The applicant has a 100 percent combined service-connected rating effective date 27 Oct 16. For reference, the Disability Evaluation System (DES) can by law, under Title 10, U.S.C., only offer compensation for those service-incurred diseases or injuries which specifically rendered a member unfit for continued active service and were the cause for career termination; and then only for the degree of impairment present at or near the time of separation from active service and not based on future progression of injury or illness. The DVA on the other hand, operates under a different set of laws (Title 38, U.S.C.) with a different purpose and is authorized to offer compensation for any medical condition determined service incurred, without regard to and independent of its demonstrated or proven impact upon a service member's retainability, fitness to serve, or the length of time since date of discharge. The DVA can also conduct periodic re-evaluations for the purpose of adjusting the disability rating awards (increase or decrease) over the lifetime of the veteran.

The complete advisory opinion is at Exhibit C.

The AFBCMR Medical Advisor recommends denying the applicant's request for a MEB and medical retirement, with all back pay and future Military Disability Retirement Pay and benefits as determined by the MEB. The Medical Advisor cannot relitigate the applicant's administrative infractions, nor can he corroborate the alleged use of false statements by the appellant's commander and that such alleged false statements, implicitly unjustly influenced the outcome of a recommended MEB. The Medical Advisor noted the signature of a fight surgeon on the initial

review in lieu of (IRILO) Worksheet/Checklist, and the recommendation for a “full MEB.” However, the Board is advised the applicant’s Primary Care Manager (PCM) may not have been the same as the convening medical authority that recommended conduction a “full MEB.” Even so, the final authority to retain a service member still rested with NGB/SG. The Medical Advisor will not attempt to defend the actions of the applicant’s commander, nor the actions taken by NGB/SG; however, the applicant is advised several factors are considered in deciding whether to retain a service member. These include consideration of the needs of the military unit, years of service attained, the desires of the service member, the availability and ability to perform alternative military duties, the severity of the condition, and health risks imposed by the offending medical condition. Thus, the Board is advised it is not uncommon for service members to be retained who have demonstrated the ability to perform alternative duties, e.g., administrative or leadership duties, unaffected by any physical restrictions imposed. While the applicant’s shoulder conditions restricted him from performing heavy lifting, pushing, pulling activities, NGB medical authorities acted within their authority to retain him, likely based upon the commander’s assessment of his ability to perform alternative duties of value. The Medical Advisor could not discern whether the applicant’s previous administrative infractions were removed or mitigated, noting the commander stated there were no administrative or judicial/non-judicial actions pending at the time of the IRILO. However, had the applicant been concurrently confronted with an approved administrative discharge and a medical basis for discharge his case would require referral to the SAF Personnel Council (SAFPC) for a “dual-action” review of his case, to determine the appropriate basis for discharge. In conducting such a review, the SAFPC would search for any causal or mitigating relationship between the appellant’s medical condition and any acts that resulted in the adverse administrative discharge action. Noting the nature of the alleged infractions, the Medical Advisor did not identify a causal or mitigating relationship between the two bases for discharge, which would likely result in execution of the administrative discharge. The Medical Advisor found no evidence of profile restrictions imposed to duty or mobility due to a respiratory condition and headaches. Stated differently, there is no evidence that either condition, or state, permanently prevented or restricted the applicant from reasonably performing the duties of his office, grade, rate, or rating.

The Board may wish to explore the possibility the NGB/SG independently considered the applicant’s relative proximity to his mandatory separation date (MSD) of Aug 15, in the decision to RTD with an ALC. This, however, would require speculation and conjecture without proof of unjust intent. Nevertheless, the applicant would have been eligible for re-evaluation in 12 months, or sooner if worse, at which time his fitness to serve would, again, be assessed.

Finally, the Medical Advisor noted in the advisory from NGB/SGP, the applicant was characterized as entering the NDDDES; meaning the condition under review was not considered duty related, nor ILOD, and he eligible for appeal of fitness only, per DoDI 1332.18, *Disability Evaluation System* and 1332.38, *Physical Disability Evaluation*. However, although the applicant ultimately required additional surgical procedures of both shoulders over a several year period, absent evidence of worsening of his condition due to intervening events when not in a duty status, the Medical Advisor opines the originating ILOD finding of 2004 should apply, under Prior Service Condition policy in DoDI 1332.18.

The complete advisory opinion is at Exhibit D.

The [Work-Product] National Guard Staff Judge Advocate [Work-Product] recommends denying the applicant's request finding no evidence of an error or injustice. Despite the applicant's assertions, the [Work-Product] submitted a copy of the CDI in response to his requests for relief and corrections; however, the relief and corrections requested that are authorized under the purview of the AFBCMR are not warranted in this matter as supported by the CDI. Additionally, any access to the base should remain with the [Work-Prod...] Air Base and higher [Work-Product] leadership, who are in the best position to determine base access/restrictions for civilians and/or retirees, particularly in light of the findings of the CDIs when applied to the applicant in this matter.

Two CDIs determined the applicant and another airman fraudulently placed themselves on Title 10 orders without authorization, by a preponderance of the evidence evidentiary standard. The recommendations of the investigating officer included disciplinary and/or administrative action against the applicant under the Uniform Code of Military Justice (UCMJ) and/or Nevada Revised Statutes (NRS); and further investigation into dual compensation, amongst many others.

The complete advisory opinion is at Exhibit E.

ARPC/DPTT recommends denying the applicant's request for a Reserve retirement to allow for full longevity service towards retired pay eligibility at age 60 and a service characterization of honorable finding no evidence of an error or injustice. The applicant had applied to be transferred to the Retired Reserve effective 9 Apr 13, which was withdrawn due to a pending administrative discharge. The applicant was discharged from the [Work-...] ANG on 31 Oct 14 and his NGB Form 22 correctly reflects a general character of service. The applicant did not apply to be transferred to the Retired Reserve prior to being discharged. Per AFI 36-3203, *Service Retirements*, paragraph 8.6, Reserve component members use AF IMT 131, *Application for Transfer to the Retired Reserve*, to apply for transfer to the Retired Reserve. The applicant applied for retired pay effective 8 May 19 which was approved which he has been receiving retired pay since 2019.

The complete advisory opinion is at Exhibit F.

## **APPLICANT'S REVIEW OF AIR FORCE EVALUATION**

The Board sent a copy of the advisory opinion to the applicant on 4 Mar 24 for comment (Exhibit G), and the applicant replied on 1 Apr 24. In his response, the applicant contends the second CDI was a false and incomplete investigation used to create a false debt, stop his promotion, debar him from the base, revoke his security clearance, and to avoid transfer to the retired Reserve in an honorable status. He goes on to detail how this CDI is false and misleading and submits evidence to support his arguments. He again contends, he did not submit a resignation and an amendment was done on his original NGB Form 22 changing it to a general service characterization to avoid SAF approval. Nor was a referral OPR done to substantiate a general discharge. He should have been processed through a MEB due to his shoulder injuries which were in the line of duty because of the requirements of performing physical fitness and testing and because there were no adverse actions against him. His medical file was destroyed and never sent to the DVA. Furthermore, a



false debt was created against him. The original Title 10 debt was established in Apr 12 by a Title 32 TAG authority. The TAG abused his authority and the legal review stated this was a state issue and involved a lower amount of funds since he would have been paid his technician pay. Aggravating the issue; a second Title 10 duty debt was established in May 15; however, no technician pay was processed to offset the debt. Lastly, he should be given SSB consideration to brigadier general with a correction made to his missing OPRs. He was submitted for promotion on 15 May 09 by his state governor. He was terminated from his wing commander position and moved to a position of no duty/no location and debarred from base without a completion of the investigation. The false allegations against him were a reprisal against him and punishment because of being a whistleblower.

The applicant's complete response is at Exhibit H.

### FINDINGS AND CONCLUSION

1. The application was timely filed.
2. The applicant exhausted all available non-judicial relief before applying to the Board.
3. After reviewing all Exhibits, the Board concludes the applicant is not the victim of an error or injustice. The Board concurs with the rationale and recommendations of NGB/SGP, the AFBCMR Medical Advisor, the Work-Product, and ARPC/DPTT and finds a preponderance of the evidence does not substantiate the applicant's contentions. Regarding the applicant's request for a medical retirement, the Board finds the applicant was properly processed for a non-duty related medical condition to which he was returned to duty being able to perform alternative duties of value. The Board did not find any medical conditions at the time of the applicant's separation permanently prevented or restricted him from reasonably performing the duties of his office, grade, rate, or rating, nor did the Board find his respiratory condition and headaches were a contributing factor to his misconduct. The mere existence of a medical diagnosis does not automatically determine unfitness and eligibility for a medical separation or retirement. Furthermore, the Board finds the discharge was consistent with the substantive requirements of the discharge regulation and was within the commander's discretion. The applicant was not eligible to be transferred to the RRL at the time of his separation because he was administratively discharged for cause per AFI 36-3209, *Separation and Retirement Procedures for Air National Guard and Air Force Reserve Members*, paragraph 5.9.2. However, according to ARPC, the applicant applied for retired pay, which was approved, and he has been receiving retired pay since 2019. The applicant alleges he has been the victim of reprisal and has not been afforded full protection under the Whistleblower Protection Act (10 U.S.C. Section 1034). The Board reviewed the evidence submitted by the applicant along with the CDI case files; however, did not find the applicant was a victim of reprisal nor did the Board find the allegations against him were false. Therefore, the Board finds no reason to reimburse him for the debt he incurred nor upgrade his discharge to honorable. If the applicant wishes to be considered for a discharge upgrade based on fundamental fairness under the 2018 Wilkie Memorandum, the applicant can submit post-service evidence under this guidance along with an application for reconsideration to determine if his post-service activities overcame the misconduct for which he was discharged. This guidance is provided for the applicant's consideration. Additionally, the Board notes the applicant's contention his Officer Performance Reports (OPR)

should be corrected and/or accomplished for the period of 2007 through 2013; however, finds no basis to grant the relief sought. Per AFI 36-2406, *Officer and Enlisted Evaluation Systems*, he had OPRs and a Letter of Evaluation generated for the periods in question which appear to be correctly prepared and processed in accordance with the regulation. Therefore, the Board recommends against correcting the applicant's records. Lastly, as for the applicant's request for his debarment order from base be lifted, he be considered for an O-7 promotion, and any termination or pay-related issues regarding his technician position, this is outside the purview of the SAF who does not have jurisdiction over decisions made by a state's governor. As for restoration of his security clearance, since the applicant is no longer serving in the military, he would wait until he gets a new employer that requires a security clearance, and the new employer would submit the proper paperwork to have his clearance reinstated.

4. The applicant has not shown a personal appearance, with or without counsel, would materially add to the Board's understanding of the issues involved.

**RECOMMENDATION**

The Board recommends informing the applicant the evidence did not demonstrate material error or injustice, and the Board will reconsider the application only upon receipt of relevant evidence not already presented.

**CERTIFICATION**

The following quorum of the Board, as defined in Department of the Air Force Instruction (DAFI) 36-2603, *Air Force Board for Correction of Military Records (AFBCMR)*, paragraph 2.1, considered Docket Number BC-2022-02990 in Executive Session on 31 Aug 23 and 22 Aug 24:

- Work-Product Panel Chair
- Work-Product, Panel Member
- Work-Product Panel Member
- Work-Product Panel Member
- Work-Product Panel Member
- Work-Product Panel Member

All members voted against correcting the record. The panel considered the following:

- Exhibit A: Application, DD Form 149, w/atchs, dated 8 Nov 22.
- Exhibit B: Documentary evidence, including relevant excerpts from official records.
- Exhibit C: Advisory Opinion, NGB/SGP, dated 9 Jan 23.
- Exhibit D: Advisory Opinion, AFBCMR Medical Advisor, dated 20 Jun 23.
- Exhibit E: Advisory Opinion, NGNV/SJA, w/atchs, dated 27 Nov 23.
- Exhibit F: Advisory Opinion, ARPC/DPTT, dated 7 Feb 24.
- Exhibit G: Notification of Advisory, SAF/MRBC to Applicant, dated 4 Mar 24.
- Exhibit H: Applicant's Response, w/atchs, dated 1 Apr 24.

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Taken together with all Exhibits, this document constitutes the true and complete Record of Proceedings, as required by DAFI 36-2603, paragraph 4.12.9.

9/11/2024

X *Work-Product*

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*Work-Product*

Board Operations Manager, AFBCMR  
Signed by: USAF

*Work-Product*