



Work-Product

UNITED STATES AIR FORCE BOARD FOR CORRECTION OF MILITARY RECORDS

RECORD OF PROCEEDINGS

IN THE MATTER OF:

DOCKET NUMBER: BC-2024-00166

Work-Product

COUNSEL: Work-Product

HEARING REQUESTED: YES

APPLICANT'S REQUEST

Her Letter of Reprimand (LOR), issued 11 Feb 22, be removed from her Officer Selection Record (OSR).

APPLICANT'S CONTENTIONS

Her due process rights were violated. Both the LOR and the Commander Directed Investigation (CDI) Report of Investigation (ROI) are legally insufficient. Since no one else received punishment or was held accountable for their portions, as a matter of equity, her LOR should be rescinded.

The CDI's Investigation Officer's (IO's) report does not meet the IO's investigative requirements in accordance with Department of the Air Force Manual (DAFMAN) 1-101, *Commander Directed Investigations*, paragraph 6.1.10.1 states "Prior to final approval and signature of an ROI containing substantiated findings, the appointing authority will provide the subject or suspect a tentative conclusion letter (TCL). The TCL will briefly outline the allegations substantiated against the subject, the primary reasons that support the substantiated conclusion... ." By only being provided a largely redacted copy of the preliminary ROI to respond to, she was deprived of her important testimony, witnesses and statements made against her. Paragraph 7.6 states, "UCMJ actions have specific requirements for providing the subject, suspect or defense counsel access to evidence. For CDIs that result in court-martial charges, the commander should provide defense counsel access to a CDI through trial counsel . . . the subject (or his counsel) may have the right to access the CDI or portions thereof." Further, paragraph 2.2.2 covers the IO's investigative duties and goes into detail the IO thoroughly gathers all the necessary facts through witnesses, documents, or other items of evidence to reach their findings and conclusion. Finally, paragraph 5.7, addresses an IO's minimum burden when it comes to interviews and states IO's interview the complainant, the subject, or document why they were not interviewed. The applicant was not afforded the opportunity to notify the IO if they missed an important witness or documentary evidence because all the witnesses names were redacted.

The LOR and UIF is legally insufficient. Department of the Air Force Instruction (DAFI) 36-2907, *Adverse Administrative Actions*, outlines rescission as a remedy for due process violations that occur in administrative actions. Paragraph 2.4.6.1.2 states due process is a requirement that legal matters be resolved according to established rules and principles, and that individuals be treated fairly. Moreover, paragraph 2.4.6.1.2 allows a Commander of equal or greater rank in the member's chain the authority to rescind LOR actions based on presentation of new evidence, legal issues not yet raised, or for any other reason. Additionally, paragraph 2.4.2.6 requires the initiating authority provide the members with any "relevant statements, portions of the investigations, reports, and other documents that serve, in part or in whole, as the basis for the letter." The

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POC: SAF.MRBC.Workflow@us.af.mil

evidence provided to the applicant was heavily redacted, including names of witnesses, which is against her due process right to all relevant statements made against her and due to the large number of redactions, she was unable to prepare a proper defense and not able to collect or conduct interviews of her own at the Tentative Conclusion Stage. In addition, the LOR initiating authority is required to provide the member all evidence they considered when making their determination on punishment. The OG/CC failed to do so when instead of providing an unredacted copy of the CDI which they used in making their final determination; they instead provided a heavily redacted copy. Finally, she was never given the appropriate paperwork which established the UIF. Therefore, the LOR and UIF are legally insufficient; an insufficient LOR and UIF deprives her of her due process rights allotted by DAFI 36-2907 and prevents her from adequately defending herself.

The CDI shows the Operations Group Top Secret Control Program (TSCP) was the product of insufficient training; was mismanaged since 2016; and the mismanagement practices were passed down from Top Secret Control Officer (TSCO) to TSCO due to insufficient training within the group. The LOR charges her of being derelict in her duties by failing to maintain the TSCP between 9 Apr 20 and 30 Jun 21; however, though not noted in the CDI, she was not involved with the program anytime after Mar 21. Furthermore, according to a memorandum from the Work... Bomb Wing Chief, Information Protection audited the program on 9 Oct 20 and stated her program was running “expertly” and complied with all Air Force Instructions and standards.

As the CDI report stands, it does not meet DAFMAN 1-101 investigative requirements and in accordance with DAFI 36-2907, the LOR is legally insufficient. The whole process has made it clear she has been “scapegoated” and faulted as she was the last TSCO at the time of the CDI. She requests the Board review the LOR *de novo*, and find this situation to be a misunderstanding that should not place her career at risk any longer as a blemish on an Officer’s OSR has career ending effects.

The applicant’s complete submission is at Exhibit A.

STATEMENT OF FACTS

The applicant is an Air Force captain (O-3).

On 21 Sep 20, according to memorandum, <redacted> *OSS Top Secret Control Program (TSCP) Security Enterprise Report*, dated 9 Oct 20, a TSCP inspection was conducted by the <redacted> Bomb Wing Information Protection office. The inspection focused on the administration, security procedures and maintenance of the TSCP and TSCP handbook. According to the report’s summary, the <redacted> OSS TSCP is currently in compliance with all assessed areas and noted all TSCO/TSCA training was conducted as required. Further, the report noted “the program is receiving excellent management from <applicant> and Capt <redacted>; the program complies with requirements.”

On 13 Jul 21, according to *CDI, Report of Investigation (ROI)*, dated 16 Aug 21, the <redacted> Operations Group Commander (OG/CC) appointed a IO to conduct an investigation into all aspects of the facts and circumstances concerning allegations of dereliction of duty in the <redacted> Operation Support Squadron (OSS) regarding a failure by former and current personnel to properly handle, control, maintain, and destroy Top Secret and Classified Information and instructed the IO to conduct the CDI in accordance with the guidance in DAFMAN 1-101. The allegations and findings contained within are as follows:

Allegation 1. In that between on or about 1 Jan 16 and on or about 30 Jun 21, former and current personnel assigned to the <redacted> Support Squadron (OSS), who should have known of their duties and other associated instructions, directives, and procedures, to include previously applicable guidance, were derelict in the performance in those duties in that they failed to handle the control, production, destruction, and movement of Top Secret and Classified Information between the missile field and <redacted> Air Force Base, <as it was their duty to do, in violation of Article 92, Uniform Code of Military Justice (UCMJ). Finding: **Substantiated**.

Allegation 2. In that between on or about 1 Jan 16 and on or about 30 Jun 21, former and current personnel assigned to the <redacted> OSS, who should have known of their duties in that they failed to properly manage the Top Secret Control Account and Nuclear Command and Control (NC2) material, as it was their duty to do, in violation of Article 92, Uniform Code of Military Justice (UCMJ). Finding: **Substantiated**.

Allegation 3. In that between on or about 1 Jan 16 and on or about 30 Jun 21, former and current personnel assigned to the <redacted> OSS, who should have known of their duties, were derelict in the performance of those duties in that they failed to establish a culture of personal responsibility over the control, production, destruction, and movement of Top Secret and Classified Information between the missile field and <redacted> Air Force Base, as it was their duty to do, in violation of Article 92, UCMJ. Finding: **Substantiated**.

On 11 Feb 22, according to memorandum, *Letter of Reprimand*, the applicant received a LOR from the OG/CC as the result of a CDI which disclosed that while serving as the TSCO, <redacted> OSS, between on or about 9 Apr 20 and on or about 30 Jun 21, she was derelict in the performance of her duties in that she negligently failed to properly manage the Top Secret Control Account and Nuclear Command and Control (NC2) material, in violation of Article 92, Uniform Code of Military Justice (UCMJ). Specifically, she failed to properly conduct 1005 inventory and audit of classified material in her care, as evidenced by discovery of numerous discrepancies on both the active and inactive register, as required by AFI 16-1401_AFGSCSUP¹. On that same date, she acknowledged receipt and had three (3) duty days to provide a response for consideration.

On 16 Feb 22, the applicant provided her response.

On 17 Feb 22, the OG/CC acknowledged the applicant's submission and decided to sustain the LOR. In addition, she was notified the LOR will be used in establishing an Unfavorable Information File (UIF). On that same date, the applicant acknowledged receipt of the final decision.

On 6 Dec 23, according to a memorandum, *Removal of Letter of Reprimand from Officer Selection Record*, dated 16 Nov 23, the <redacted> Training Wing Commander, concurred with the recommendation of the applicant's current squadron and group commanders to remove the LOR from her OSR.

For more information, see the excerpt of the applicant's record at Exhibit B and the advisory at Exhibit C.

¹ Air Force Instruction (AFI) 16-1404_Air Force Global Strike Command Supplement Air Force Global Strike Command Guidance Memorandum 2020-0 (AFI 16-1404_AFGSCSUP_AFGSCGM 2020-0), Air Force Information Security Program, dated 2 December 2020.

APPLICABLE AUTHORITY/GUIDANCE

DAFI 36-2907, *Adverse Administrative Actions*, 14 Oct 22:

1.2. Adverse Information for Total Force Officer Selection Boards Overview. All adverse information an officer receives will be filed in the OSR and will be considered by promotion selection, special selection, Federal recognition (ANG specific), and selective continuation boards to the grade of O-4 and above (to include processes for O-3 promotions that have “extraordinary adverse information” per Department of Defense Instruction (DoDI) 1320.14, *DoD Commissioned Officer Promotion Program Procedures*. Adverse information is any substantiated finding or conclusion from an officially documented investigation or inquiry or any other credible information of an adverse nature. To be credible, the information must be resolved and supported by a preponderance of the evidence. To be adverse, the information must be derogatory, unfavorable, or of a nature that reflects clearly unacceptable conduct, integrity, or judgment on the part of the individual. Adverse information includes, but is not limited to: 1.2.1.4. LORs.

2.2, Standard of Proof. The Standard of Proof for adverse administrative actions is the “preponderance of evidence.” This standard will be used when evaluating the evidence and every element of the alleged offenses. A preponderance of the evidence exists when it is more likely than not that events have occurred as alleged. Preponderance of the evidence is not determined by the number of witnesses or exhibits, but by all the evidence and evaluating facts such as a witness’ behavior, opportunity for knowledge, information possessed, ability to recall, as well as related events and relationships being considered. Consider whether such proof is available before initiating the administrative action. If such proof is lacking, administrative action may be determined legally insufficient and, as a result, could be set aside. There is no requirement to prove any allegation beyond a reasonable doubt.

2.3.5. Letter of Reprimand. Administrative censure for violation of standards which is more severe than a Record of Individual Counseling (RIC), Letter of Counseling (LOC), Letter of Admonishment (LOA) and indicates a stronger degree of official censure. It may also be issued when other, less severe methods have failed to correct behavior. For Officers only: *Only supervisors and members of the officer’s current administrative or operational chain of command may issue an LOR to an officer.* If the person who issues the LOR is not the officer’s unit commander, the person who issued the reprimand must send it to the administrative unit commander. The administrative unit commander acknowledges and endorses the AF Form 1058, *Unfavorable Information File Actions*, establishing the UIF or, if a member has an existing UIF, adds the document to the member’s UIF. The AF Form 1058, does not need to be referred to the officer for a response because LORs for officers are mandatory UIF filings.

2.4.2.6. LOCs, LOAs, and LORs will include and list as attachments: relevant statements, portions of investigations, reports, and other documents that serve, in part or in whole, as the basis for the letter. **(T-2)** Redact Privacy Act material and Personally Identifiable Information and mark, “Controlled Unclassified Information.” **(T-1)**.

2.4.2.6.1. Documents released from investigations, reports, etc., should be accompanied by a cover memorandum indicating that the documents are “Controlled Unclassified Information” and specify any handling requirements (see **Attachment 4** for a sample memorandum). The issuer of a LOC, LOA, or LOR is not required to create statements or other documentary evidence that does not exist otherwise to support the basis of an adverse administrative action.

2.4.2.6.2. Documents should not be released to the member without authorization from the issuing authority. Release approval should be obtained before the letter is issued. When impractical

to obtain release before the letter is issued, obtain such approval as soon as possible after service of the letter on the member but do not release the documents until approval is received.

DAFMAN 1-101, *Commander Directed Investigations*, 9 Apr 21:

1.1. Overview. Commanders at all levels in the DAF may order investigations of individuals, programs, and processes under their authority.

1.3. CDI Purpose. The CDI is a tool to gather, analyze and record relevant information about matters of primary interest to those in command. The CDI is an extension of the commander's authority to investigate and to correct problems within the command. As such, the CDI is internal to the command concerned. There are two reasons a commander may want to conduct a CDI: to investigate systemic (or procedural) problems or to look into matters regarding individual conduct or responsibility. CDIs are administrative investigations.

1.4. Standard of Proof. The standard of proof for a CDI is preponderance of the evidence. A preponderance of the evidence is defined as the greater weight of credible evidence. When the greater weight of credible evidence supports the alleged events, it means the events as alleged are more likely than not to have occurred and the investigating officer (IO) may consider the events proven. While the amount of evidence is something to consider, less credible evidence will not trump a smaller amount of more credible evidence. Some additional things to consider when weighing the evidence are witnesses demeanor, opportunity for knowledge, bias, motive, intent, and the ability to recall and relate events. At all times, IOs must use their own common sense, life experiences, and knowledge of the ways of the world to assess the credibility of witnesses they interview and the evidence gathered in the investigation. (T-3).

5.7. How Much Investigation is Enough. At a minimum, IOs interview the complainant, the subject, and all *witnesses named by a complainant or subject*, or document why they were not interviewed.

6.1.10. Commander (Appointing Authority) Approval and Actions. Tab J. Upon receipt, the commander reviews the entire CDI case file, including the legal review. 6.1.10.1. Prior to final approval and signature of an ROI containing substantiated findings, the appointing authority will provide the subject or suspect a tentative conclusion letter (TCL). (T-3). The TCL will briefly outline the allegations substantiated against the subject, the primary reasons that support the substantiated conclusion, and will include a redacted copy of the relevant portions of the preliminary ROI as well as a transcript of the subject's testimony as attachments. (T-3).

7.5. CDI Records Release. The initiating commander is the release authority for CDIs. There are two types of releases: Freedom of Information Act (FOIA) and an official use request (OUR). Release of the CDI to the public falls under the FOIA. The commander should follow the guidance in DoDM 5400.07_AFMAN 33-302, *Freedom of Information Act* (5 USC § 552). All information that is denied release requires a legal review. An OUR falls under the Privacy Act (5 USC § 552a (b)(1)). Information protected by the Privacy Act may be released to DoD employees who have a need to know in order to perform their duties. DoD personnel may not release the information outside of this parameter unless it falls under another statutory condition of disclosure or one of the routine uses in the System of Records Notice. See OpJAGAF 2019-35 for further guidance.

7.6. Subject, Suspect or Defense Counsel Requests. UCMJ actions have specific requirements for providing the subject, suspect or defense counsel access to evidence. *For CDIs that result in court-martial charges*, the commander should provide defense counsel access to a CDI through trial counsel. Defense counsel (or the member) may request a copy of a CDI to respond to an

administrative action. Depending on the type of action, the subject (or his counsel) may have the right to access the CDI or portions thereof.

Air Force Instruction (AFI) 1-2, *Commander's Responsibilities*, 8 May 14:

3.2.3. Training. Commanders must ensure their units are adequately trained. Unit training should take a building-block approach. Individuals must be proficient in careerfield specific skills before incorporating those skills into team and unit training. Unit training spanning the entire scope of the unit mission should include total force, joint, or partner-nation opportunities whenever possible. Training should replicate the distributed, chaotic and uncertain nature of expected operating environments.

3.2.4. Development. Commanders will support the professional and personal development of subordinates. Professional development includes formal mentoring, professional military education, academic opportunities, and other broadening opportunities. Personal development strengthens physical, mental, social and spiritual resiliency in an effort to build well-rounded Airmen.

AIR FORCE EVALUATION

APFC/DPMSSM recommends denying the request. Based on the evidence provided by the applicant and analysis of the facts, there is insufficient evidence of an error or injustice. Based on the findings of a CDI, the applicant's commander issued her a LOR which was subsequently placed in an UIF in accordance with DAFI 36-2907, Chapter 3, *Unfavorable Information File (UIF)*. The applicant indicates her commander failed to administer the LOR and UIF in accordance with DAFI 36-2907; however, this citation misrepresents portions of the guidance. The applicant indicates the issuing authority initiated the UIF inappropriately stating, "applicant was never given the appropriate paper work." However, per DAFI 36-2907, paragraph 3.2.1, Officer UIFs, "For mandatory documents (Article 15s, LOR, court-martial, or civilian court convictions), the DAF Form 1058² does not need to be referred to the officer for a response." Regardless, UIF disposition is two years from the date commander initiated it, unless subsequent adverse action extends it and in the applicant's case, her UIF expired in Feb 24. In regard to the CDI, this office can not speak to whether it has or lacks merit, only that in accordance with DAFI 36-2907, any substantiated finding from an officially documented investigation, i.e. CDI, will be filed in the OSR.

The complete advisory opinion is at Exhibit C.

AF/JAJI recommends denying the request. Based on the record there is insufficient evidence of a material error or injustice. The applicant makes three main contentions as alleged error or injustice: (1) Her due process rights were violated with regards to the LOR because the evidence attached was "heavily redacted," to include witness names, and she was unable to prepare a proper defense and she was never notified of the UIF; (2) Her due process rights were violated with regard to the CDI because the copy of the preliminary ROI provided with the TCL was also "largely redacted," particularly with regards to witness names which deprived her of "the opportunity to notify the IO if they missed an important witness or documentary evidence,"; and (3) the LOR should be removed as a matter of "equity" because "no others received punishment or were held accountable for their portions." They address each of these arguments in turn.

² DAF Form 1058, *Unfavorable Information File*

a. LOR Redacted Evidence. According to AFI 33-332, *Air Force Privacy and Civil Liberties Program*, dated 10 Mar 20, paragraph 1.3.1³, Personally Identifiable Information (PII) is “information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other information that is linked or linkable to a specific individual” to include names, addresses, dates of birth, and places of employment, as well as other data elements. As such, redaction of PII in the evidence provided to the applicant in support of her LOR is in conformance with applicable regulations and thus her due process rights were not violated.

b. UIF. According to DAFI 36-2907, paragraph 2.3.5.2, “The AF Form 1058 [*Unfavorable Information File Actions*] does not need to be referred to the officer for a response because LORs for officers are mandatory UIF filings.” Therefore, she was not entitled to a referral of the AF Form 1058 for a response. As such, there was no violation of her due process rights and the LOR and UIF are legally sufficient. However, a review of her personnel records reveals no UIF is contained within therein; either a UIF was never established as required, or it was never included in her personnel records, or it has been removed.

c. Redacted CDI ROI. In accordance with DAFI 36-2907, paragraph 6.1.10.1, the appointing authority will provide the subject of a CDI a TCL. However, like evidence provided in support of an LOR, the copy of the CDI ROI provided to subject with the TCL is required to be redacted. Therefore, her due process rights were not violated in this regard either.

d. Alleged Injustice. The applicant alleged no other personnel were disciplined as a result of the CDI because she was the only member remaining under the OG/CC’s command at the conclusion of the investigation. In accordance with DAFMAN 1-101, the initiating commander may release CDI records to DoD employees who have a need to know in order to perform their duties therefore, the OG/CC had the authority to share the CDI ROI with the commanders of the other subjects, as well as the commanders of the former OSS leadership for consideration and possible disciplinary actions. However, the record does not disclose whether the OG/CC did share the CDI with other commanders, or even if they did, whether those commanders took any disciplinary action. What is certain, is the OG/CC had no control over whether any members identified as culpable through the CDI were disciplined, other than the applicant.

Regardless, we note the CDI findings show a TSCP program in complete disarray for a significant period of time, long before the applicant ever assumed duties as the TSCO. Although the CDI did not specifically address any former OSS commander as a subject, the IO noted several times in the ROI the CDI found lack of emphasis, training, or oversight by former squadron commanders. The <redacted> BW/JA’s legal review also noted as an anomaly the CDI’s failure to adequately address the lack of squadron commander accountability. The OG/CC’s recommendations in their *Inspector General Referral Completion Report*, affirms squadron leadership is ultimately responsible for a successful TSCP within the OSS. The OG/CC’s recommendation for establishment of a full-time civilian position at the group-level to serve as an educator, expert, and supervisor of the Top Secret Control Account, the Nuclear Command and Control material, and security is indicative the responsibility is far too immense to simply be an extra duty for a junior officer. It is clear from the CDI ROI, the applicant’s actions were only one small piece of a much larger issue, spanning a lengthy period of time. While she bears some responsibility for her role, we are firmly convinced the lack of commander oversight, involvement and management of the TSCP and TSCO was a systemic problem within the OSS over the five years investigated and is in large part the overarching cause of the disastrous state of the program. The possibility that one TSCO was held accountable, without equal or similar treatment of all TSCOs, and especially

³ Office of Management and Budget Memorandum M-17-12, *Preparing for and Responding to a Breach of Personally Identifiable Information*.

without accountability for former squadron leadership, is deeply concerning. At the end of the day, ultimate responsibility for appropriate and effective management of the TSCP and TSCA within the OSS, rests firmly on the shoulders of each squadron commander, not with a junior action officer. Further, in accordance with AFI 1-2, *Commander's Responsibilities*, paragraphs 3.2.3 and 3.2.4, it is a commander's responsibility to ensure personnel within their command are adequately trained and developed. In the military, responsibility rolls uphill.

If the applicant was truly the only member who was held accountable, then this could certainly be considered in determining whether an injustice occurred. However, she has provided no evidence to confirm her assertion no other individuals were held accountable. As a result, we cannot determine whether an injustice has in fact transpired. We have taken note she provided endorsements from her current chain of command, including her Brigadier General wing commander, recommending removal of LOR from her OSR and it is apparent her current leadership holds her in high regard. Although this display of support is certainly remarkable, we are simultaneously cognizant of the inherent authority of a commander to address matters under their command. As a result, we are reluctant to recommend the Board overturn the OG/CC's action without further evidence. However, we leave the door open for the applicant to apply for reconsideration if she submits additional evidence substantiating no other individuals were punished.

APPLICANT'S REVIEW OF AIR FORCE EVALUATION

The Board sent a copy of the advisory opinion to the applicant on 20 May 24 for comment (Exhibit D), but has received no response.

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 or an error or injustice. After thoroughly reviewing this application, the Board concurs with the rationale and recommendations of both AFPC/DPMSSM and AF/JAJI advisory opinions and finds a preponderance of the evidence does not substantiate the applicant's contentions. While, the applicant contends her commander failed to follow the guidelines contained with DAFI 36-2907 and thus violated her due process rights as she was unable to prepare a proper defense to both the LOR and CDI due to evidence being heavily redacted, the Board disagrees and finds the redaction of Personally Identifiable Information (PII) was prepared and provided in accordance with the governing directive, AFI 33-332. Furthermore, while the Board notes the CDI findings showed a TSCP program in complete disarray and considered the possibility that she may have been the only one held accountable, the applicant has failed to provide any substantiating evidence to support this assertion or show that she was not derelict in the performance of her duties to properly manage the program. In addition, the Board recognizes the support from her current chain of command who recommend removing the LOR and while commendable, without further evidence that the underlying actions that led to the LOR did not take place, the Board does not find her situation unique and recognizes the authority of the issuing commander to correct behavior. As such, in accordance with AFI 36-2907, when officers are issued an LOR, it requires mandatory filing in a UIF and therefore does not need to be referred to the officer for a response. Thus, the Board unanimously agreed both the CDI and LOR are legally sufficient, the action was well within the commander's authority, and the evidence presented does not demonstrate an error or injustice that

show it was unjust or inaccurate as written. Therefore, the Board recommends against correcting the applicant’s record.

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-2024-00166 in Executive Session on 10 Dec 24:

Work-Product Panel Chair
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 3 Jan 24.
- Exhibit B: Documentary evidence, including relevant excerpts from official records.
- Exhibit C: Advisory Opinion, AFPC/DPMSSM, dated 18 Mar 24.
- Exhibit D: Advisory Opinion, AFPC/JAP, w/atchs, dated 14 May 24.
- Exhibit E: Notification of Advisory, SAF/MRBC to Applicant, dated 20 May 24.

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.

3/26/2025

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Board Operations Manager, AFBCMR

Signed by: Work-Product