

RECORD OF PROCEEDINGS

IN THE MATTER OF:

DOCKET NUMBER: BC-2024-03746

XXXXXXXXXXXXXXXXXX

COUNSEL: XXXXXXXXXXXX

HEARING REQUESTED: NOT INDICATED

APPLICANT'S REQUEST

His official military personnel records be amended to restore his lieutenant colonel (O-5) grade for retirement.

APPLICANT'S CONTENTIONS

Counsel contends the applicant's request is based on legal error, material injustice, and equity, and he should retain his rank of lieutenant colonel in retirement. Despite a clear absence of supporting evidence, he was issued a Letter of Reprimand (LOR) while deployed in 2016. The LOR and a substantiated finding in a legally deficient investigation in 2021 triggered a mandatory officer grade determination (OGD), despite the support and full endorsement of his chain of command which demonstrates his honorable service as a lieutenant colonel. Generally, a commissioned officer retires in the highest grade in which he served satisfactorily for not less than six months in accordance with Title 10, United States Code § 1370(a)(1) [10 U.S.C. § 1370(a)(1)]. All evidence and records support the applicant's retirement at his earned rank of lieutenant colonel.

It is clear the LOR should never have been issued because the evidence did not support a finding of misconduct by a preponderance of the evidence. Even if the lack of an evidentiary foundation for the LOR is ignored, the applicant's record indicates he served honorably in the rank of lieutenant colonel. Even with the LOR, an analysis of the factors outlined in the Air Force instruction makes it clear his appropriate grade for retirement is lieutenant colonel. Despite the clear record, the Grade Determination Review Board¹ failed to properly consider and apply the law to facts and reached a decision that not only represented a failure to properly review the case, but it also resulted in an unjust and inequitable outcome. Neither triggering event for the OGD was supported by legally sufficient, let alone credible, evidence. This reality was ignored by the OGD board despite the fact that they are required to assess all circumstances and make an independent determination of satisfactory service. The OGD board ignored exculpatory evidence and focused only on the fact that derogatory data existed. Further, the board failed to place the alleged misconduct in the context of the applicant's overall service.

The LOR issued in 2016 was based on unsubstantiated and frankly odd allegations. After Chapel support staff were enraged by a leadership decision the applicant made, they indicated for the first time that incidental and/or accidental touching such as a hand on a shoulder made them uncomfortable. Critically, the applicant's subordinate threatened to file an Equal Opportunity (EO) complaint against him if she did not get her way. Ultimately, the decision was made not to include the LOR in his Officer Selection Record (OSR). The fact that the LOR was not to be considered when evaluating him for promotion is significant evidence that this was considered a minor incident that should not hinder the possibility of future advancement.

¹ The term utilized in DAFI 36-3203, *Service Retirements*, is Officer Grade Determination (OGD), and this term will be applied from this point forward.

The substantiated finding in an investigation in 2021 was the result of a presumption of guilt and a misapplication of the legal standard of a preponderance of the evidence. According to the Commander Directed Investigation (CDI), the allegations involved fist bumping the arm, touching an arm, a hand on the back, trying to sit in seats near subordinates at staff meetings, and winking. The Investigating Officer (IO) concluded no aspects of the interactions were necessarily sexual in nature nor was there any evidence of favoritism or disparate treatment. Because the finding was flawed and not supported by facts, logic, or common sense, command exercised the discretion to withdraw an LOR and counsel the applicant with a Letter of Counseling (LOC) that was not filed in his Unfavorable Information File (UIF) or made a part of his record. What became clear was that information from the 2016 LOR was provided to the IO, was improperly relied upon by the IO, and was known to those making the allegations as well as leadership. In addition, the IO failed to read the applicant's Article 31 rights. The handling of the investigation and reliance on information from the 2016 case allowed for the collusion of witnesses and an improper assumption of guilt. While it might be easy to ignore the presumption of innocence and due process and conclude there is a pattern of misconduct, the only patterns present in this case are an outstanding and highly professional officer who upholds standards and individuals weaponizing the system to retaliate against leadership decisions they did not like.

The earliest alleged misconduct at issue here is alleged to have occurred in late 2015. By 2016, when the LOR was issued, the applicant had satisfactorily served in the grade of lieutenant colonel for approximately three years and had continuously distinguished himself as an officer and a leader. His current leadership and numerous leaders who served with him as a lieutenant colonel fully recommended retention of his rank for retirement. A reduction in rank has resulted in significant and lasting harm and has punished his wife and their three children. At a difference of more than \$780 pay per month, and based on average life expectancy, a reduction in rank will have the effect of punishing him and his family with a loss of income of over \$300,000.

Counsel cited 10 U.S.C. § 1370(a)(1), Department of the Air Force Instruction (DAFI) 36-3203, *Service Retirements*, paragraph 8.6.2.2 and DAFI 36-2907, *Adverse Administrative Actions*, paragraph 2.2, Air Force Instruction (AFI) 36-2909, *Air Force Professional Relationships and Conduct*, paragraphs 5.1 – 5.2.2, and AFI 90-301, *Inspector General Complaints Resolution*, as relevant authority.

Pursuant to AFI 36-2907, the standard of proof is the preponderance of the evidence. If evidence to support an adverse action is not sufficient to meet the burden of proof, an administrative action may be deemed legally insufficient and, as a result, could be set aside. Additionally, pursuant to AFI 36-2909 and the intent of AFI 90-301, a commander or supervisor must take appropriate action if it is reasonable to believe retaliation has occurred but at a minimum, the member or members suspected of engaging in retaliation will be ordered to cease engaging in any further retaliation. As soon as practical, the alleged victim or the military member who is believed to have been retaliated against will be informed that command is aware of the suspected actor or acts of retaliation as well as the alleged offenders have been ordered to cease from engaging in any further violation.

Counsel further cited *Arnett v. Kennedy*, 416 U.S. 134 (Powell, J., concurring in part) (1974) and *Goldberg v. Kelly*, 397 U.S. 254 (1970) regarding due process and *Coffin, et al. v. United States*, 156 U.S. 432 (1895), regarding the presumption of innocence. Counsel also cited DAFI 51-209² regarding the definition of arbitrary and capricious. In his argument for relief, counsel cited 10 U.S.C. § 1552 and AFI 36-2603, *Air Force Board for Correction of Military Records (AFBCMR)*, regarding Secretary of the Air Force and AFBCMR authority.

² Typographical error. DAFI 51-209 does not exist.

A factual and legal analysis of the applicant's case suggests his rank should not have been reduced. As outlined in the DAFI, this review should consider the applicant's length and quality of service in each grade, the nature and length of the misconduct, the impact of the misconduct on military effectiveness, and the recommendations of the chain of command. The applicant's duty performance was exemplary throughout his career, which spanned over three decades of honorable and distinguished service and weighed heavily against a reduction of his retired grade. Further, given that the date of the earliest instance of alleged misconduct was the end of 2015, the records indicate he served not only satisfactorily as a lieutenant colonel but excelled. His officer performance reports (OPR) as a lieutenant colonel demonstrate documented excellence, mission dedication, and a focus on operational readiness. Analysis based on overall service and service as a lieutenant colonel prior to any allegation of misconduct supports his retirement as a lieutenant colonel. The grade determination was based on two isolated instances of alleged misconduct. Each instance was limited to reports by subordinates that some aspect of the applicant's behavior made them uncomfortable after he made a leadership decision they did not like. Further, the LOR was not placed in the applicant's OSR, and the 2021 incident was handled with an LOC. There was, and is, no evidence to suggest the alleged misconduct was severe, repeated, malicious, or that it ever had a direct impact on military effectiveness. The allegations involved were, at worst, perceptions of behavior more than any actual inappropriate behavior or comments. None of the allegations had any recognizable or direct impact on military readiness or effectiveness and none of the allegations were of a crude or sexual nature. Given that a critical evaluation factor for the OGD board to consider was the opinion and recommendation of his leadership, and that it was clear the applicant had the highest level of support from his past and current leadership, not only was it appropriate to allow him to retire as a lieutenant colonel, it was clearly an arbitrary and capricious decision for the OGD board to reduce him in rank.

The facts and circumstances of this case should be understood within the larger context of subordinates weaponizing investigations because they did not like the leadership decisions of an officer. It would be a disservice to good order and discipline and a violation of due process to allow an LOR and substantiated finding that were both based on a presumption of guilt and legal error to uphold the significant financial and military status punishment that would result from a reduction in rank. While it was a clear violation of applicable legal standards and due process to issue adverse action at all, even if that is ignored, the outcome of the OGD was an inequity and injustice under the particular circumstances of this case. The LOR was not made part of the applicant's OSR indicating his command did not believe it should impact his ability to be promoted and serve as a colonel. The second investigation resulted in an LOC which is intended as a low-level form of counseling and not a punishment or record of misconduct warranting career ending or impacting consequences.

Additional information is now available to assist the AFBCMR in evaluating this case. The applicant provides a detailed memorandum which documents information not previously available and that was not reviewed by the OGD board. Critically, the information shows the injustice that occurred in the investigations and provides new evidence of subordinates weaponizing the system against the applicant. It is clear the adverse actions were the result of the collusion of subordinates to destroy the career of an officer when they did not get their way. This was inexplicably ignored by leadership when addressing the investigations and subsequent adverse actions. There is now information available that shows simply because of the nature of the allegations, the applicant was denied equitable treatment and due process. Systemic bias impacted the process and contributed to the current result. If there was any question of error, additional character letters are available that continue to speak to the applicant's honorable service throughout his career as well as in the rank of lieutenant colonel. This new information should override any potential deference this Board might be tempted to give command or the OGD board and provides ample evidence to overcome the presumption of administrative regularity.

The applicant's complete submission is at Exhibit A.

STATEMENT OF FACTS

The applicant is a retired Air Force major (O-4).

On 14 Jan 16, the Air Expeditionary Wing vice commander (AEW/CV) issued the applicant an LOR stating the results of a CDI disclosed that between 12 Oct 15 and on or about 9 Dec 15, the applicant touched members of the wing Chaplain office without their consent, that conduct was prejudicial to good order and discipline, and his actions were in violation of Article 134, Uniform Code of Military Justice (UCMJ). The applicant provided a written response on 18 Jan 16.

On 25 Feb 16, according to a letter from applicant's civilian defense counsel, Subject: Reconsideration of LOR and UIF, counsel requested the applicant's LOR, and mandatory filing in his UIF and OSR, be withdrawn.

On 3 Mar 16, according to a USAF EC/CC memorandum, Subject: Order Not to File Letter of Reprimand in Officer Selection Record of [applicant], the applicant's LOR was not filed in his OSR.

According to AF Form 707, *Officer Performance Report (Lt thru Col)*, for the period 11 Jun 15 through 14 Apr 16, the applicant received a referral OPR due to a rating of Does Not Meet Standards in Section III, *Performance Factors*.

On 19 Apr 16, according to a letter from applicant's civilian defense counsel, Subject: [applicant] – Response to Referral OPR, counsel contended the referral line of this OPR was improper and in violation of regulations controlling such documents, requested the referral line of the OPR be removed, and the OPR not referred.

On 5 Apr 21, the Training Wing commander (TRW/CC), issued the applicant an LOR stating an investigation had disclosed between on or about 1 Aug 20 and on or about 1 Feb 21, the applicant created a hostile work environment and engaged in unprofessional conduct through inappropriate physical contact and gestures directed towards female enlisted members. The applicant provided a written response on 8 Apr 21.

On 31 Jul 23, the applicant was furnished an honorable discharge with narrative reason for separation of Sufficient Service for Retirement, and was credited with 20 years, 1 month, and 23 days active service.

On 31 Jul 23, according to Special Orders Number XXXXX, dated 23 Feb 23, the applicant was relieved from active duty, organization and station of assignment, and retired effective 1 Aug 23, in the grade of O-4.

According to Special Orders Number XXXXX (Amendment), Special Orders Number XXXXX, dated 23 Feb 23, was amended. Remarks: Officer Grade Determination is completed. Per SAF (Secretary of the Air Force) memorandum, dated 20 Feb 23, member served satisfactorily and is retired in the grade of O-4, effective 1 Aug 23.

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

APPLICABLE AUTHORITY/GUIDANCE

10 U.S.C. § 1370 – *Regular commissioned officers*

(a) *Retirement in Highest Grade in Which Served Satisfactorily.*

(1) *In general.* Unless entitled to a different retired grade under some other provision of law, a commissioned officer (other than a commissioned warrant officer) of the Army, Navy, Air Force, Marine Corps, or Space Force who retires under any provision of law other than chapter 61 or 1223 of this title shall be retired in the highest permanent grade in which such officer is determined to have served on active duty satisfactorily.

DAFI 36-2907, *Adverse Administrative Actions*, Chapter 2 – *Administrative Counseling, Admonishment, and Reprimand*:

2.2. *Standard of Proof.* The Standard of Proof for adverse administrative actions is a “preponderance of the evidence.” This standard will be used when evaluating the evidence and every element of the alleged offenses.

2.2.1. A preponderance of the evidence merely means that it is more likely than not that a fact exists. Preponderance of the evidence is not determined solely by the volume of witnesses or documentary evidence supporting or refuting an allegation. Rather, it is based on the totality of the circumstances, the inherent probability or improbability of the evidence, and a determination as to the weight and significance of the evidence and the credibility of the witnesses.

2.2.2. 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 withdrawn. There is no requirement to prove any allegation beyond a reasonable doubt.

DAFI 36-3203, *Service Retirements*, Chapter 8 - *Determining Retired Grade and Pay*:

8.6. *OGD in Conjunction with Retirement (10 U.S.C. § 1370, 10 U.S.C. § 1370a, and 10 U.S.C. § 12771, Reserve officers: grade on transfer to Retired Reserve).* An officer is not automatically entitled to retire in the highest grade held. Instead, an officer is retired in the highest grade in which the officer served satisfactorily (with sufficient SIG or a waiver) as determined by the Secretary of the Air Force (SecAF) or delegate. The SecAF or delegate will normally seek the review and recommendation of SAFPC (Secretary of the Air Force Personnel Council) prior to making a determination of satisfactory service for an OGD in the case of any officer in the grade of O-6 or below who is seeking to retire.

8.6.2. The determination of “satisfactory” or “creditable” service in a particular grade is a matter of SecAF discretion.

8.6.2.2. In considering whether an officer has provided satisfactory or creditable service, the SecAF or delegate will consider the following: the nature and length of the officer’s improper conduct, the impact the conduct had on military effectiveness, the quality and length of the officer’s service in each grade at issue, past cases involving similar conduct, and the recommendations of the officer’s chain of command. In some cases, a single incident of misconduct can render service in a grade unsatisfactory despite a substantial period of otherwise exemplary service.

8.6.3. Initiating an OGD. The unit commander or other appropriate authority must initiate an OGD when:

8.6.3.4. The officer received nonjudicial punishment pursuant to Article 15, UCMJ or a letter of reprimand, since the officer’s last promotion. If the nonjudicial punishment or letter of reprimand has been set aside, removed, or withdrawn, then an OGD is not required under this paragraph unless the nonjudicial punishment or letter of reprimand resulted from a substantiated adverse finding or conclusion as set forth in paragraph 8.6.3.5. Note: The following

documents do not require the initiation of an OGD under this paragraph: a letter of counseling, a letter of admonition, a record of individual counseling, and/or a referral officer performance report. Similarly, removal from command, not based on a substantiated adverse finding or conclusion as set forth in paragraph 8.6.3.5, does not require the initiation of an OGD under this paragraph.

8.6.3.5. The officer, since the last promotion, has been the subject of any substantiated adverse finding(s) or conclusion(s) from an officially documented investigation, proceeding, or inquiry conducted by competent military or civilian authorities (except minor traffic infractions), regardless of the command action taken against the officer (if any). Examples of officially documented investigations, proceedings, or inquiries include, but are not limited to: command-directed investigations (CDIs); Inspector General (IG) investigations; and Equal Opportunity investigations.

AIR FORCE EVALUATION

SAF/MRBP recommends denying the application. The evidence presented by the applicant is not sufficient to conclude the Air Force Personnel Board's (AFPB) recommendation, or the ultimate decision by the SecAF's delegee, represents an error or injustice.

The AFPB considered the applicant's OGD on 3 Feb 23. The OGD was mandatory pursuant to DAFI 36-3203, paragraphs 8.6.3.4 and 8.6.3.5, based on the applicant being the subject of substantiated adverse findings from two officially documented investigations and receiving an LOR while holding the grade of O-5. The AFPB, after consideration of the case, recommended retirement in the lower grade of O-4 based on finding the applicant's service in the grade of O-5 was not satisfactory. The AFPB specifically found that, on balance, the five mandatory factors requiring consideration did not weigh in favor of satisfactory service. On 20 Feb 23, after considering the recommendation of the AFPB and the available evidence of record, the SecAF's delegee concluded the applicant's service in the grade of O-5 was not satisfactory and directed his retirement in the lower grade of O-4.

Under DAF regulations, "[a]n officer is not automatically entitled to retire in the highest grade held." DAFI 36-3203, paragraph 8.6. Rather, a commissioned officer shall be retired in the highest permanent grade in which he served on active duty satisfactorily, as determined by the Secretary of the military department concerned. 10 U.S.C. § 1370(a)(1) (emphasis added). DAFI 36-3203, paragraphs 8.6.3.4 and 8.6.3.5 require an OGD be initiated when an officer who submits a retirement request both has received an LOR and was the subject of substantiated adverse findings from an officially documented investigation, proceeding, or inquiry since the last promotion. DAFI 36-3203, paragraph 8.6.2.2 outlines that when considering whether an officer has provided satisfactory or creditable service, the SecAF or delegate will consider the following factors: the nature and length of the officer's improper conduct, the impact the conduct had on military effectiveness, the quality and length of the officer's service in each grade at issue, past cases involving similar conduct, and the recommendations of the officer's chain of command. "In some cases, a single incident of misconduct can render service in a grade unsatisfactory despite a substantial period of otherwise exemplary service." DAFI 36-3203, paragraph 8.6.2.2. The presumption of regularity applies to the AFBCMR. In an action before the AFBCMR, the burden is on an applicant to establish by a preponderance of the evidence the existence of an error or injustice in the official action. Title 32, Code of Federal Regulations § 865.4(a) [32 CFR § 865.4(a)]; DAFI 36-2603, paragraph 4.1. Other than his own assertions, the applicant has provided no evidence indicating the decision in his OGD was somehow an error or injustice.

The AFPB lawfully and rationally conducted the OGD proceeding leading to the determination that the applicant's service in the grade of O-5 was not satisfactory. The applicant's objections

largely revolve around disputing the merits of the AFPB's conclusions and reiterating arguments that had been previously addressed and dismissed during the AFPB's deliberations. Other than these uncorroborated assertions, the applicant has presented no evidence that would undermine the adjudication of his case before the AFPB or the ultimate decision by the SecAF's delegee.

The AFPB, comprised of senior officers and a senior civilian, reviewed all five mandatory factors from DAFI 36-3203 and unanimously concluded these factors did not support a finding of satisfactory service in the grade of O-5. The AFPB had all necessary evidence to weigh these factors in its possession when making its decision. The two separate CDIs in 2016 and 2021, which substantiated allegations of a hostile work environment, sexual harassment, and improper, unwanted touching of female members of his staff were in the file, as were the LOR and LOC. The AFPB also had a complete and robust response package from the applicant with its character letters, and all his performance reports and decorations in grade, as well as the command recommendations. The record demonstrates the AFPB took the applicant's response to the OGD, to include the memorandum from his civilian defense attorney, into account when evaluating whether he had served satisfactorily. Specifically, the applicant during the OGD process raised concerns about the accuracy of the initial CDI and propriety of the LOR. During this process, the applicant, through counsel, described the conduct at issue as "hypersensitive complaints" from "disgruntled NCOs," and referred to the second set of allegations, as "slandorous." In his response to the OGD notification, the applicant, again through counsel, characterized the allegations as at worst involving "perceptions of behavior more than any actual inappropriate behavior or comments." The AFPB had access to the applicant's assertions when deliberating on the case but ultimately did not find them credible or persuasive based on its objective review of the evidence and statements provided in the CDIs. In conducting its independent review, the AFPB unanimously voted the applicant's service in the grade of O-5 was not satisfactory.

The applicant's AFBCMR contention only raises one instance of additional information – a statement by the applicant alleging bias in the investigative process. Although he contends his statement is new evidence, these contentions were raised in his civilian defense counsel's brief to the AFPB when counsel raised concerns with bias that triggered the allegations resulting in his LOR. Additionally, the applicant asserts the AFPB placed improper weight on the LOR given that it was not included in his OSR file. He ignores that the AFPB looks at the totality of the record and evidence provided and has provided nothing new to show that it was an injustice to review an LOR which was upheld by the command chain. The applicant does not explain why the decision is inequitable other than asserting concerns that the presumption of innocence was not applied. That presumption is a criminal law concept that is not applicable to SAFPC administrative proceedings or its interpretation of DAF instructions.

Furthermore, the applicant's assertions contain inaccurate representations about his OGD case. Whereas the applicant contends the AFPB should have reviewed his service record over his entire career, only the nine years he served in the grade of O-5 were at issue under DAFI 36-3203. Although there were two instances of misconduct, DAFI 36-3203 recognizes even a single instance can render the entire period of service in grade unsatisfactory. The applicant's behavior leading to the administrative actions was sporadic but repeated. The applicant erroneously contended the recommendations of command supported retirement in the higher grade of O-5, whereas his Numbered Air Force Commander and MAJCOM [Major Command] deputy commander provided recommendations that the applicant served satisfactorily in the grade of O-4, noting the unprofessional conduct that surfaced in 2021 was similar in nature to unprofessional conduct addressed in 2016, demonstrating the applicant did not internalize lessons he should have learned.

In summary, the OGD determination in the applicant's case was both rational and supported by substantial evidence, and it did not violate any laws or regulations. The AFPB considered and

appropriately weighed all the evidence on record and reached a well-reasoned conclusion in line with legal and regulatory standards.

The complete advisory opinion is at Exhibit C.

APPLICANT'S REVIEW OF AIR FORCE EVALUATION

The Board sent a copy of the advisory opinion to the applicant on 7 Apr 25 for comment (Exhibit D) but has received no response.

FINDINGS AND CONCLUSION

1. The application was timely filed.
2. The applicant exhausted all other available administrative remedies 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 recommendation of SAF/MRBP and finds a preponderance of the evidence does not substantiate the applicant's contentions. Two separate investigations, conducted during different periods, in different locations, by different investigators, involving different complainants, substantiated allegations of inappropriate touching and/or physical contact with airmen without consent. Further, the Board found the LORs which resulted from the CDIs to be within the commanders' discretion and in accordance with DAFI 36-2907. While the applicant disputes the allegations and CDI findings, claiming bias, retaliation, and collusion by the complainants, he has provided no evidence to support his contentions. The new information alluded to by counsel is limited to allegations of bias in the investigative process and does not contain any new evidence. These allegations of bias were also previously presented to the AFPB for consideration during the OGD; therefore, they were not new information. Additionally, the AFPB, when conducting the applicant's OGD, reviewed all five mandatory factors in accordance with DAFI 36-3203, and unanimously found his service in the grade of lieutenant colonel was not satisfactory. This Board did not find the applicant's contentions regarding the nature of the complaints or the complainants to be compelling or persuasive enough to warrant overturning the AFPB's recommendation. Furthermore, DAFI 36-3203 recognizes even a single instance of misconduct can render an entire period of service in grade unsatisfactory. In the instant case, there were two separate, substantiated instances of misconduct of the same nature. Therefore, the Board recommends against correcting the applicant's records.
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 DAFI 36-2603, *Air Force Board for Correction of Military Records (AFBCMR)*, paragraph 2.1, considered Docket Number BC-2024-03746 in Executive Session on 15 Aug 25:

, Panel Chair
, Panel Member
, Panel Member

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

- Exhibit A: Application, DD Form 149, w/atchs, dated 23 Oct 24.
- Exhibit B: Documentary evidence, including relevant excerpts from official records.
- Exhibit C: Advisory Opinion, SAF/MRBP, dated 3 Apr 25.
- Exhibit D: Notification of Advisory, SAF/MRBC to Applicant, dated 7 Apr 25.

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.

X

Board Operations Manager, AFBCMR