



**DEPARTMENT OF THE AIR FORCE
MILITARY JUSTICE AND DISCIPLINE DIRECTORATE
TRIAL DEFENSE DIVISION**

24 January 2026

MEMORANDUM FOR MILITARY JUDGE
TRIAL COUNSEL

FROM: DEFENSE COUNSEL (Capt Travis Ellis)

Subject: Defense's Notice re: Military Rules of Evidence (M.R.E.) 404(a)(2) and 608(a) –
U.S. v. SSgt Kinyada J. Johnson (Tinker AFB, OK)

1. In accordance with the Military Judge's Scheduling Order, the Defense provides notice of its intent to offer the following evidence in the above-titled case.

- a. Evidence of SSgt Johnson's lawfulness;
- b. Evidence of SSgt Johnson's character for truthfulness

2. Discovery in this case is still ongoing. Should the Defense become aware of any additional evidence that may fall under the purview of M.R.E. 404(a)(2) or 608(a) that the Defense intends to introduce at trial, the Defense respectfully requests the opportunity, and reserves the right to supplement and/or edit this notice.

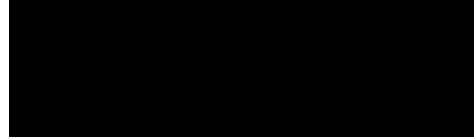
3. If you have any questions, please contact me at [REDACTED] or [REDACTED]

[REDACTED]

TRAVIS F. ELLIS, Capt, USAF
Area Defense Counsel

CERTIFICATE OF SERVICE

I certify that I caused a copy of this Notice to be served on the Military Judge and Trial Counsel via email on 24 January 2026.



TRAVIS F. ELLIS, Capt, USAF
Area Defense Counsel