

**DEPARTMENT OF THE AIR FORCE  
TRIAL JUDICIARY**

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UNITED STATES	)	GOVERNMENT RESPONSE
	)	TO DEFENSE MOTION
v.	)	TO COMPEL BILL
	)	OF PARTICULARS
1ST LT TRAVIS C. BAKER	)	
Delta 4 Detachment 2 (SpOC)	)	
Buckley SFB, Colorado	)	31 May 2023

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The United States, by and through counsel, hereby provides a bill of particulars pursuant to Rule for Courts-Martial 906(b)(6). The defense has requested what essential facts establish that the accused was dishonorably and disgracefully disrespectful to [REDACTED] which, under the circumstances, was unbecoming an officer and a gentleman.<sup>1</sup>

**BILL OF PARTICULARS**

1. The following actions of the accused, all of which took place at or near Peterson Space Force Base, Colorado, on or about 14 October 2022, establish that he was dishonorably and disgracefully disrespectful to [REDACTED] which, under the circumstances, was unbecoming an officer and a gentleman, in violation of Article 133, UCMJ, as alleged in Charge III, Specification 1:

- a. Yelling at [REDACTED] that “my rights as an American citizen are being violated” several times.
- b. Demanding that his keys be returned to him immediately so he could leave the installation and “drive to a date I planned in Denver which I spent a lot of money on.”
- c. Yelling at [REDACTED] “I do not appreciate you walking away from me!”
- d. Refusing to step out of his vehicle two times after being asked by [REDACTED] in order to be apprehended.
- e. Angrily refusing to turn around and face his truck to be handcuffed.
- f. As he was being handcuffed, glaring at [REDACTED], scowling, glancing down at his name tape, and saying “[REDACTED] ...I’ll remember that name” in a threatening manner.
- g. Saying to [REDACTED] as he was being transported “he better not touch me” and “Sarge, why is the verbal abuser in the vehicle.”

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<sup>1</sup> See Attachment.

- h. Stealing [REDACTED] wallet.
  - i. Attempting to touch [REDACTED] face with his fingers covered in dye.
2. The Government reserves the right to amend this bill of particulars at any time.

Respectfully submitted,

[REDACTED]

GLENN L. HOLMES, Capt, USAF  
Trial Counsel

Attachment:

Defense Request for Bill of Particulars, dated 21 May 2023 (2 pages)

### **CERTIFICATE OF SERVICE**

I certify that a copy of this Government Response to Defense Motion to Suppress Evidence was served upon the Military Judge and Defense Counsel via electronic mail on 31 May 2023.

[REDACTED]

GLENN L. HOLMES, Capt, USAF  
Trial Counsel