
**DEPARTMENT OF THE AIR FORCE
UNITED STATES AIR FORCE TRIAL JUDICIARY**

UNITED STATES

v.

FIRST LIEUTENANT TRAVIS C. BAKER
Delta 4 Detachment 2 (SpOC)
Buckley Space Force Base, CO

MOTION TO WITHDRAW AS
MILITARY DEFENSE COUNSEL

12 April 2023

MOTION & SUMMARY

COMES NOW Capt Anna K. E. Sturges, the undersigned detailed military defense counsel, for the Accused, 1st Lt Travis C. Baker, pursuant to Rules for Courts-Martial (RCM) 505(d)(2) and 506(c), and Uniform Rules of Practice Before Department of the Air Force Courts-Martial Rule 2.5(B), and respectfully requests to withdraw from the above-captioned case based upon 1st Lt Baker's release of the undersigned counsel from further representation. 1st Lt Baker continues to be represented by Capt Kevin J. Schrop and will be joined by civilian defense counsel, Mr. Jonathan Crisp, who has recently been retained by 1st Lt Baker. An Article 39(a) hearing is not requested.

FACTS

1. 1st Lt Baker is charged with one charge and two specifications of false official statements in violation of Article 107, Uniform Code of Military Justice (UCMJ), one charge and two specifications of controlling a vehicle while drunk in violation of Article 113, UCMJ; and one charge and two specifications of conduct unbecoming of an officer in violation of Article 133, UCMJ. A general court-martial is presently docketed to being on 15 May 2023.

2. On 11 April 2023, 1st Lt Baker released Capt Sturges as military counsel. This release was documented in writing.¹

3. The law firm Crisp and Associates, LLC, has been retained by 1st Lt Baker to represent him at his court-martial. Mr. Jonathan Crisp's notice of appearance to is forthcoming. Capt Schrop, military defense counsel, will continue to represent 1st Lt Baker.

LAW AND ARGUMENT

4. RCM 506(c) states that "[e]xcept as otherwise provided... defense counsel may be excused only with the express consent of the accused, or by a military judge upon application for withdrawal by defense counsel for good cause shown."

¹ (Attachment 1) Release of Military Defense Counsel, dated 11 April 2023 (1 page)

5. Uniform Rules of Practice Before Department of the Air Force Courts-Martial, effective 27 March 2023, Rule 2.5(B) directs that “[d]etailed and individual military defense counsel may not withdraw from representation of the accused without CDMJ or military judge approval, whether or not the accused desires to release military counsel (*see also* RCMs 505(d)(2) and 506(c)).”

6. 1st Lt Baker has expressly, knowingly, and voluntarily released the undersigned counsel as his military defense counsel. As 1st Lt Baker has retained civilian defense counsel and will continue to be represented by detailed military defense counsel, he will not be prejudiced by the withdrawal of the undersigned counsel as his military defense counsel.

RELIEF REQUESTED

7. For the reasons articulated above, the undersigned counsel respectfully requests to withdraw from the above-captioned case based upon 1st Lt Baker’s decision to release the undersigned counsel from further representation.

8. The Defense does not request an Article 39(a) session.

Respectfully submitted this 12th day of April 2023.



ANNA K. E. STURGES, Capt, USAF
Defense Counsel

Attachment:

1. Release of Military Defense Counsel, dated 11 April 2023 (1 page)

CERTIFICATE OF SERVICE

I certify that I served a copy of this motion to withdraw as detailed defense counsel on the Military Judge and Trial Counsel on 12 April 2023.



ANNA K. E. STURGES , Capt, USAF
Defense Counsel