

IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS

UNITED STATES

Appellee

**MOTION FOR LEAVE TO FILE
SUPPLEMENTAL CITATIONS OF
AUTHORITY**

v.

Docket No. ARMY 20200623

Private (E-2)

CAMERON M. MAYS,

United States Army,

Appellant

Tried at Fort Drum, New York, on 19 June, and 8, 13, and 19-22 October 2020, before a general court-martial appointed by Commander, Headquarters, Fort Drum, Lieutenant Colonel Teresa L. Raymond and Lieutenant Colonel William C. Ramsey, military judges, presiding.

TO THE HONORABLE, THE JUDGES OF THE
UNITED STATES ARMY COURT OF CRIMINAL APPEALS

COME NOW the undersigned appellate counsel, pursuant to Rule 25.5(b) of this court's Rules of Appellate Procedure, and move for leave to file supplemental citations of authority following oral argument in the above-captioned case for the following citations made during oral argument that were not set forth in the briefs.

1. *United States v. Briggs*, 141 S. Ct. 467, 470 (2020): Regarding statutory construction, other sections of the Uniform Code of Military Justice are a natural referent, because "[t]he UCMJ is, after all, a 'uniform code' . . ."

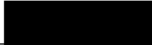
2. *United States v. Pease*, 75 M.J. 180, 184 (C.A.A.F. 2016): Regarding statutory construction, this court "interpret[s] words and phrases used in the UCMJ by examining the ordinary meaning of the language, the context in which the language is used, and the broader statutory context."

3. *United States v. Davis*, ARMY 20160069, 2018 CCA LEXIS 417, n.7 (Army Ct. Crim. App. 16 Aug. 2018) (mem. op.):* Regarding application of rule of lenity as alternative means of relief involving statutory interpretation of indecent broadcast under Article 120c, UCMJ.

4. *United States v. Lajoie*, 79 M.J. 723 (N.M. Ct. Crim. App. 2019): Regarding interpretation of indecent broadcast under Article 120c, UCMJ, and refutation to the narrow interpretation in *United States v. Davis*, ARMY 20160069, 2018 CCA LEXIS 417 (Army Ct. Crim. App. 16 Aug. 2018) (mem. op.).


PANEL NO. 2

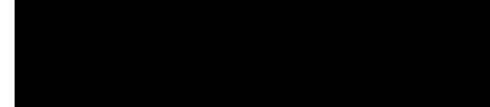
MOTION FOR LEAVE TO
FILE SUPPLEMENTAL
CITATIONS OF AUTHORITY

GRANTED: 

DENIED: _____

DATE: 12 August 2022

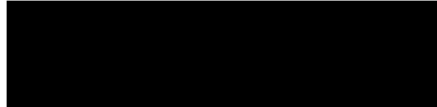

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* <https://www.jagcnet.army.mil/ACCALibrary/cases/opinion/file/legacy/2550>

CERTIFICATE OF FILING AND SERVICE

I certify that a copy of the foregoing was electronically submitted to the
Army Court and Government Appellate Division on 11 August 2022.



ANDREW R. BRITT
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