

CHARGE I: VIOLATION OF THE UCMJ, ARTICLE 125

THE SPECIFICATION: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near Kandahar Airfield, Afghanistan, on divers occasions, between on or about 1 December 2011 and on or about 5 February 2012, commit sodomy with Captain (O-3) [REDACTED], by force and without the consent of the said Captain (O-3) [REDACTED].

CHARGE II: VIOLATION OF THE UCMJ, ARTICLE 120.

SPECIFICATION 1: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, on a military flight from Baghdad, Iraq to Kuwait, between on or about 1 November 2009 and on or about 21 November 2009, and at or near Kandahar Airfield, Afghanistan, on divers occasions, between on or about 1 December 2011 and on or about 5 February 2012, engage in sexual contacts with Captain (O-3) [REDACTED], to wit: grabbing her [REDACTED], [REDACTED], and [REDACTED], and such sexual contacts were without legal justification or lawful authorization and without the permission of Captain (O-3) [REDACTED].

SPECIFICATION 2: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near Eschenbach, Germany, on divers occasions, between on or about 1 January 2010 and on or about 31 May 2010, at or near Tucson, AZ, on or about 17 September 2010, and at or near Kandahar Airfield, Afghanistan, on divers occasions between on or about 1 September 2011 and on or about 5 February 2012, wrongfully commit indecent conduct, to wit: engage in [REDACTED] sexual acts with Captain (O-3) [REDACTED] while [REDACTED] with Captain (O-3) [REDACTED] in an [REDACTED] at Kandahar Airfield, Afghanistan.

CHARGE III: VIOLATION OF THE UCMJ, ARTICLE 80.

THE SPECIFICATION: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, having received a lawful command from Major General (O-8) James L. Huggins, his superior commissioned officer, then known by the said Brigadier General (O-7) Jeffrey A. Sinclair to be his superior commissioned officer, to immediately cease all contact with Captain (O-3) [REDACTED], or words to that effect, did, at or near Kuwait, on or about 20 March 2012, attempt to willfully disobey the same by calling her cell phone.

CHARGE IV: VIOLATION OF THE UCMJ, ARTICLE 92.

SPECIFICATION 1: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at divers locations, at or near FOB Kalsu, Iraq, Grafenwoehr, Germany, Tucson, AZ, Fort Hood, TX, Fort Bragg, NC, and Kandahar Airfield, Afghanistan, between on or about 1 November 2008 and on or about 19 March 2012, violate a lawful general regulation, to wit: paragraph 4-

14b, Army Regulation 600-20, dated 18 March 2008, by wrongfully engaging in an inappropriate relationship with Captain (O-3) [REDACTED].

SPECIFICATION 2: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at divers locations at or near Grafenwoehr, Germany, FOB Kalsu, Iraq, Fort Bragg, NC, and Kandahar Airfield, Afghanistan, between on or about 18 April 2008 and on or about 19 March 2012, violate a lawful general regulation, to wit: paragraph 4-14b, Army Regulation 600-20, dated 18 March 2008, by wrongfully engaging in an inappropriate relationship with Captain (O-3) [REDACTED].

SPECIFICATION 3: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at divers locations at or near Fort Bragg, NC, and Kandahar Airfield, Afghanistan, between on or about 15 July 2010 and on or about 19 March 2012, violate a lawful general regulation, to wit: paragraph 4-14b, Army Regulation 600-20, dated 18 March 2008, by wrongfully engaging in an inappropriate relationship with Major (O-4) [REDACTED].

SPECIFICATION 4: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near Kandahar Airfield, Afghanistan, between on or about 1 October 2011 and on or about 20 March 2012, violate a lawful general order, to wit: General Order No. 1, Combined Joint Task Force-82, dated 1 October 2011, by wrongfully possessing alcohol.

SPECIFICATION 5: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near Kandahar Airfield, Afghanistan, between on or about 1 October 2011 and on or about 20 March 2012, violate a lawful general order, to wit: General Order No. 1, Combined Joint Task Force-82, dated 1 October 2011, by wrongfully introducing, possessing, and displaying pornographic and sexually explicit photographs and movies.

SPECIFICATION 6: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near FOB Kalsu, Iraq, between on or about 4 April 2009 and on or about 21 November 2009, violate a lawful general order, to wit: General Order No. 1, Headquarters, Multi-National Corps-Iraq, dated 4 April 2009, by wrongfully introducing, possessing, and displaying pornographic and sexually explicit photographs and movies.

SPECIFICATION 7: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near Tucson, AZ, on divers occasions, between on or about 17 September 2010 and on or about 18 September 2010, violate a lawful general regulation, to wit: paragraph 4-22, Army Regulation 600-20, dated 18 March 2008, by wrongfully using his government travel charge card for personal purposes.

SPECIFICATION 8: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near Fort Hood, TX, on divers occasions, between on or about 7 November 2010 and 10 November 2010, violate a lawful general regulation, to wit: paragraph 4-22, Army Regulation 600-20, dated 18 March 2008, by wrongfully using his government travel charge card for personal purposes.

CHARGE V: VIOLATION OF THE UCMJ, ARTICLE 93.

SPECIFICATION 1: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, at divers locations, at or near FOB Kalsu, Iraq, Grafenwoehr, Germany, Fort Bragg, NC, and Kandahar Airfield, Afghanistan, on divers occasions, between on or about 1 November 2008 and on or about 19 March 2012, did maltreat Captain (O-3) [REDACTED], a person subject to his orders, by using his authority to direct Captain (O-3) [REDACTED] to answer "[REDACTED]" or words to that effect, as the reason for why she made mistakes or errors and by using his rank and authority to coerce and compel Captain (O-3) [REDACTED] to maintain a sexual relationship with him and prevent her from ending the sexual relationship with him.

SPECIFICATION 2: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, at or near Kandahar Airfield, Afghanistan, on divers occasions, between on or about 1 September 2011 and on or about 30 September 2011, did maltreat Captain (O-3) [REDACTED], a person subject to his orders, by pressuring Captain (O-3) [REDACTED] to [REDACTED].

CHARGE VI: VIOLATION OF THE UCMJ, ARTICLE 132.

SPECIFICATION 1: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, for the purposes of obtaining the approval and payment of a claim against the United States in the amount of \$992.89, did, at or near Fort Bragg, NC, on or about 2 November 2010, use certain writings, to wit: an electronic Request and Authorization for TDY Travel of DOD Personnel, DD Form 1610 and an electronic Travel Voucher or Subvoucher, DD Form 1351-2, which said writings, as he, the said Brigadier General (O-7) Jeffrey A. Sinclair, then knew, contained statements that he traveled to Fort Huachuca, AZ, on temporary duty for the purpose of training attendance, which statements were false and fraudulent in that he traveled to Tucson, AZ, for personal reasons and not part of any official travel, and were then known by the said Brigadier General (O-7) Jeffrey A. Sinclair to be false and fraudulent.

SPECIFICATION 2: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, for the purposes of obtaining the approval and payment of a claim against the United States in the amount of \$3,164.61, did, at or near Fort Bragg, NC, on or about 16 November 2010, use certain writings, to wit: an electronic Request and Authorization for TDY Travel of DOD Personnel, DD Form 1610 and an electronic Travel Voucher or Subvoucher, DD Form 1351-2, which said

writings, as he, the said Brigadier General (O-7) Jeffrey A. Sinclair, then knew, contained statements that he traveled to Fort Hood, TX, on temporary duty for the purpose of conference attendance, which statements were false and fraudulent in that he traveled to Killen, TX, for personal reasons and not part of any official travel, and were then known by the said Brigadier General (O-7) Jeffrey A. Sinclair to be false and fraudulent.

CHARGE VII: VIOLATION OF THE UCMJ, ARTICLE 133.

SPECIFICATION 1: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at divers locations, at or near Fort Bragg, NC and at or near Kandahar Airfield, Afghanistan, on divers occasions, between on or about 1 September 2010 and on or about 19 March 2012, cause Captain (O-3) [REDACTED] to maintain a sexual relationship with him, by threatening to use his rank, position, and authority to damage or ruin her military career if she ended their sexual relationship, conduct unbecoming an officer and gentleman.

SPECIFICATION 2: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near Kandahar Airfield, Afghanistan, on divers occasions between on or about 1 September 2011 and on or about 5 February 2012, wrongfully engage in sexually explicit communications with a company grade officer, Captain (O-3) [REDACTED], a woman who was not his wife, conduct unbecoming an officer and gentleman.

SPECIFICATION 3: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did at or near Kandahar Airfield, Afghanistan, on divers occasions, between on or about 7 November 2011 and on or about 19 March 2012, wrongfully request nude photos and did subsequently receive and possess nude photographs and a sexually explicit video from a field grade officer, Major (O-4) [REDACTED], conduct unbecoming an officer and gentleman.

SPECIFICATION 4: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at divers locations, at or near Grafenwoehr, Germany, FOB Kalsu, Iraq, Fort Bragg, NC, and Kandahar Airfield, Afghanistan, on divers occasions, between on or about 1 October 2007 and on or about 19 March 2012, engage in an inappropriate relationship with [REDACTED], a woman not his wife, conduct unbecoming an officer and gentleman.

SPECIFICATION 5: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at divers locations, at or near Kandahar Airfield, Afghanistan, and Fort Bragg, NC, between on or about 1 February 2012 and on or about 2 April 2012, attempt to engage in an inappropriate relationship with First Lieutenant (O-2) [REDACTED], conduct unbecoming an officer and gentleman.

SPECIFICATION 6: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at divers locations, at or near FOB Kalsu, Iraq, Grafenwoehr, Germany, Fort Bragg, NC, and Kandahar Airfield, Afghanistan, on divers occasions, between on or about 1 November 2008 and on or about 19 March 2012, orally communicate in the presence of others certain indecent language to wit: using derogatory and demeaning words to refer to female staff officers and when confronted about the use of that language he responded, "I'm a general, I'll say whatever the [REDACTED] I want," or words to that effect, conduct unbecoming an officer and gentleman.

CHARGE VIII: VIOLATION OF THE UCMJ, ARTICLE 134.

SPECIFICATION 1: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near Kandahar Airfield, Afghanistan, on or about 21 March 2012, wrongfully endeavor to impede an investigation in the case of himself, by deleting nude photographs of [REDACTED] and deleting the electronic mail account [REDACTED], conduct prejudicial to good order and discipline in the armed forces and of a nature to bring discredit upon the armed forces.

SPECIFICATION 2: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, a married man, did, at divers locations, at or near FOB Kalsu, Iraq, Grafenwoehr, Germany, Schweinfurt, Germany, Tucson, AZ, Fort Hood, TX, Fort Bragg, NC, and Kandahar Airfield, Afghanistan, on divers occasions, between on or about 1 May 2009 and on or about 5 February 2012, wrongfully have sexual intercourse with Captain (O-3) [REDACTED], a woman not his wife, conduct prejudicial to good order and discipline in the armed forces and of a nature to bring discredit upon the armed forces.

SPECIFICATION 3: In that Brigadier General (O-7) Jeffrey A. Sinclair, U.S. Army, did, at or near FOB Kalsu, Iraq, between on or about 1 May 2009 and on or about 21 November 2009, wrongfully communicate to Captain (O-3) [REDACTED] a threat to [REDACTED] if she told anyone about their relationship, or words to that effect, conduct prejudicial to good order and discipline in the armed forces and of a nature to bring discredit upon the armed forces.

(END OF CHARGES)