In the Supreme Court of the United States

STUDENTS FOR FAIR ADMISSIONS, INC., Petitioner,

PRESIDENT & FELLOWS OF HARVARD COLLEGE

STUDENTS FOR FAIR ADMISSIONS, INC., Petitioner,

University of North Carolina, et al.

On Writs of Certiorari to the United States Court of Appeals for the First & Fourth Circuits

BRIEF OF VETERANS FOR FAIRNESS AND MERIT AS AMICUS CURIAE SUPPORTING PETITIONER

CLAUDE M. MCQUARRIE III GENE C. SCHAERR McQuarrie Law Office 20887 Sweetglen Drive Porter, TX 77365

Counsel of Record ERIK S. JAFFE

H. CHRISTOPHER BARTOLOMUCCI

HANNAH C. SMITH KATHRYN E. TARBERT JORDAN E. SMITH ANNIKA M. BOONE* SCHAERR | JAFFE LLP 1717 K Street NW

Suite 900

Washington, DC 20006

(202) 787-1060

gschaerr@schaerr-jaffe.com

Counsel for Amicus Curiae

MAY 9, 2022

TABLE OF CONTENTS

	Page
TABLE OF AUTHORITIES	ii
INTRODUCTION & INTEREST OF AMICUS	1
SUMMARY OF ARGUMENT	4
ARGUMENT	6
I. No National Security Concern Provides a Compelling Interest Justifying Race-Based Admissions.	6
A. The National Defense Has Been Carried Out Effectively with a Meritocratic, "Colorblind" Military Culture	6
B. There is No Competent Evidence That Race-Conscious Admissions Are Essential for Military Effectiveness	18
II. National Security Is Better Served When Military Officer Accessions Are Race- Neutral and Exclusively Merit-Based	21
A. Racial Preferences Reduce Military Effectiveness	22
B. The Service Academies' Experience With Racial Preferences Illustrates This	97
Threat To National Security	41

TABLE OF AUTHORITIES

Page(s)
Cases
Anderson v. Laird, 466 F.2d 283 (D.C. Cir. 1972)21
Fisher v. Univ. of Texas at Austin (Fisher I), 570 U.S. 297 (2013)
Fisher v. Univ. of Texas at Austin (Fisher II), 579 U.S. 365 (2016)
Grutter v. Bollinger, 539 U.S. 306 (2003)
Parents Involved in Community Schools v. Seattle School District No. 1, 551 U.S. 701 (2007)30
Other Authorities
2020 Demographics: Profile of the Military Community, Dep't of Def 10, 11, 19
Black History and The Vietnam War, a Story, Afr. Am. Registry9
Black Opposition to Vietnam, Amistad Digit. Res
David A. Blum & Nese F. DeBruyne, Cong. Rsch. Serv., RL32492, American War and Military Operations Casualties: Lists and Statistics 16 (2020)
Br. of Lt. Gen. Julius W. Becton, Jr., et al. as <i>Amici Curiae</i> In Support of Resp'ts, <i>Fisher</i> v. <i>Univ. of Tex. at Austin</i> , 570 U.S. 297 (2013) (No. 11-345)

Br. of Lt. Gen. Julius W. Becton, Jr., et al. as <i>Amici Curiae</i> In Support of Resp'ts,
Fisher v. Univ. of Tex. at Austin, 579 U.S. 365 (2016) (No. 14-981)
Class Profiles, U.S. Mil. Acad
D'Vera Cohn & Scott Funk, Chapter 5: The Public and the Military, in War & Sacrifice in the Post-9/11 Era 59 (Pew Rsch. Ctr. 2011)
Confidential written communication to counsel for <i>Amicus</i> (Nov. 23, 2021) (on file with counsel)
Consol. Br. of Lt. Gen. Julius W. Becton, Jr., et al. as <i>Amici Curiae</i> In Support of Resp'ts, <i>Grutter</i> v. <i>Bollinger</i> , 539 U.S. 306 (2003) (No. 02-241)
DCAS Vietnam Conflict Extract File Record Counts by RACE OMB NAME (as of Apr. 29, 2008), Nat'l Archives
Diversity at West Point: Multi-Cultural By Design, U.S. Mil. Acad
Sayce Falk & Sasha Rogers, Junior Military Officer Retention: Challenges and Opportunities (Kennedy Sch. of Gov't, Harvard Univ. 2011)
Clare Fitzgerald, Project 100,000: The Controversial Recruiting Program of the Vietnam War, War Hist. Online (Jan. 7, 2022)

Sydney J. Freedberg, Jr., The Fallen: A profile of U.S. troops killed in Iraq and Afghanistan, Gov't Exec. (May 28, 2004)
Gerald F. Goodwin, Black and White in Vietnam, N.Y. Times (July 18, 2017)
Mike Guardia, Hal Moore: A Soldier Once and Always (Casemate 2021)
Lisa Hsiao, Project 100,000: The Great Society's Answer to Military Manpower Needs in Vietnam, Viet. Generation (1989)
Interviews, Race in the Military, W. Point Ctr. for Oral Hist20
Harry Jackson, Opinion, Should Military Officers Be Chosen By Race?, Wall St. J., (Aug. 19, 2021)
Daniel Johnson, These are America's Black Medal of Honor Recipients, Task & Purpose (Feb. 22, 2022)
Phillip Keuhlen, Does the Navy's New Emphasis on 'Diversity' Put the Nation at Risk?, Am. Greatness (Nov. 5, 2021)
Aaron Kliegman, Pentagon's Embrace of Wokeness Undermining Ability to Wage War, Critics Warn, Just the News (Feb. 24, 2022)28

Robert Lerner & Althea K. Nagai, Preferences in the Service Academies,
Ctr. for Equal Opportunity (Oct. 16, 2006) 27, 28
Lieutenant General Darryl A. Williams, U.S. Mil. Acad
Lieutenant General Richard M. Clark, U.S.A.F. (Oct. 2020)
List of active duty United States four-star officers, Wikipedia
James Maycock, War Within War, The Guardian (Sept. 14, 2001)
H.R. McMaster, Dereliction of duty: Lyndon Johnson, Robert McNamara, the Joint Chiefs of Staff, and the lies that led to Vietnam (Harper Collins 1998)
H.R. McMaster, Preserving the Warrior Ethos, Nat'l Rev. (Oct. 28, 2021)
Harold G. Moore & Joseph L. Galloway, We Were Soldiers Onceand Young: Ia Drang—The Battle That Changed the War in Vietnam (Random House 1992)
Lauren Mottle, "We Resist on the Grounds We Aren't Citizens": Black Draft Resistance in the Vietnam War Era, 6 J. Civ. & Hum. Rts. 26 (2020)

Walt Napier, A Short History of Integration in the U.S. Armed Forces, U.S.A.F. (July 1, 2021)	. 7
Greg Newbold, A retired Marine 3-star general explains 'critical military theory,' Task & Purpose (Feb. 10, 2022)	15
Greg Newbold, How Woke U.S. Military Leaders Make U.S. Enemies More Likely to Start a War, The Federalist (July 29, 2021)	26
Off. of Historian, U.S. Dep't of State, Biographies of the Secretaries of State: Colin Luther Powell (1937–2021)	20
On Diversity as Strength, usmaData (June 10, 2018)28, 29, 3	30
Chris Petty, How today's 'diversity' damages our military, Am. Thinker (Mar. 19, 2022)	23
Strength Analysis & Forecasting Div., Off. of Dep'y Chief of Staff, G-1, Dep't of Army, Army Demographics: FY20 Army Profile (Sept. 30, 2020)	12
The Black Panther Party Ten-Point Program, BlackPast (Oct. 15, 1966)	.8
The Military Draft During the Vietnam War, Mich. in the World	. 7
Jim Tyson, Companies Must Venture into 'Jungle' of Approaches to ESG Ratings, CFODive (Mar. 23, 2022)	11

Sun Tzu,	
The Art of War (Courier Corp. ed. 2002) (5th c. BCE)	14
W. Point Ass'n of Graduates Dev. Off., A Family's Impact on West Point, Together We Lead (Spring 2022)	20
Buchanan Waller, Inside the Pentagon's shameful effort to draft mentally disabled men to fight in Vietnam, Task & Purpose (May 3, 2022)	
Dakota Wood, Identity Politics and Critical Race Theory Have No Place in U.S. Military,	
The Heritage Foundation (Mar. 29, 2021)	14

INTRODUCTION & INTEREST OF AMICUS¹

Amicus Veterans for Fairness and Merit (VFM) submits this brief to ensure that the Court is accurately informed about the effects of racial preferences on our national defense. Unfortunately, this Court's decision in *Grutter* v. *Bollinger*, 539 U.S. 306 (2003), relied on misinformation about those effects. VFM urges the Court not to make the same mistake again.

VFM is a veterans' organization that advocates for equal opportunity in the U.S. armed forces—that is, race-neutral, exclusively merit-based military officer accession, assignment, and promotion policies. VFM's membership (currently 627) consists of former members of all branches of the United States military, including a wide range of enlisted men and women as well as members of all officer ranks, including 119 general/flag officers. App. A at 1a; App. B at 14a. VFM's membership is a representative cross-section of the U.S. military, with heavy emphasis on combat deployments (934), combat leadership (476), and other highstress operational experience. App. B at 14a.

VFM's members include 21 recipients of the Medal of Honor and hundreds of recipients of other decorations for combat valor. See App. E at 38a. For example, VFM members have been awarded 9 Distinguished Service/Navy/Air Force Crosses, 142 Silver Stars, and 212 Bronze Star Medals with "V" device (for combat

¹ All parties have consented to the filing of this brief. No counsel for a party authored any part of it, nor did any person or entity, other than *Amicus* and its counsel, make a monetary contribution to fund its preparation or submission. *Amicus* is not publicly traded and has no parent corporations, and no part of it is owned by any publicly traded corporation.

valor). VFM's members also received 215 Purple Hearts for wounds received in combat. App. B at 15a.

Beyond being honored for their valor, VFM members also represent a breadth of combat experience that spans every major and minor conflict over the last seven decades, including wars in Korea, Vietnam, the Gulf, Iraq, and Afghanistan. See App. B at 18a. They fought at every enlisted and officer level, ranging from rifleman, squad leader, platoon sergeant, platoon leader, team leader, company/troop commander, flight leader, ship captain, squadron commander, battalion commander, wing commander, brigade commander and all higher levels of command up through the highest four-star level. VFM's members include large numbers of combat-experienced pilots and crew, with 45 of them surviving years of torture and other inhumane acts as POWs. App. B at 15a; App. E at 42a. Many of VFM's members also served aboard (and commanded) our Navy's submarines, aircraft carriers, and surface warfare vessels in both combat operations and highly stressful Cold War operations. Many served in (and some commanded) unconventional, clandestine operations, combat and Cold War aerial reconnaissance, and strategic nuclear missile operations.

VFM's members also possess intimate knowledge of the ROTC programs and service academies. They include 100 ROTC commissioned officers and 292 service academy graduates (USMA, USNA, USAFA, USCGA, USMMA), some of whom also served as an academy Superintendent, Commandants, a Dean of Faculty, Permanent Professors, War College Commandants, training center commanders, recruiting commanders, education and training commanders, as

well as service-wide chief personnel officers. See App. B at 18a; App. D at 27a.

Furthermore, VFM's members have served in the highest possible roles in academic, government, corporate, and academic spheres. They include two former service Chiefs of Staff, twelve four-star Army, Navy or Air Force officers, and many other former senior military commanders and leaders, White House aides, government officials, and college and university presidents. See id.

Most importantly, VFM's members' knowledge about the effects of racial preferences results directly from all forms of combat experience. This includes innumerable leadership positions on the battlefield at virtually every level, especially at lower levels where direct interactions between our warfighters and the enemy occur and effective combat leadership determines mission success and life or death. It also includes leadership positions on the water and in the air, non-combat leadership at every level (including many four-star major commands), specialty roles of nearly every type, and university and corporate leadership. In sum, their collective knowledge of the culture required for the United States military to succeed on the battlefield is unparalleled.

The names of VFM's current members (with some exceptions for needed anonymity) and their aggregated statistical information are listed at Appendices A and B, respectively. Those lists (to be updated continuously until this Court's decision), along with members' aggregated demographic and some individual information, are available at the following site: https://bit.ly/VFMpublicdocs.

SUMMARY OF ARGUMENT

In this Court's most recent cases involving racial preferences in college admissions—Grutter v. Bollinger, 539 U.S. 306 (2003), Fisher v. Univ. of Texas at Austin (Fisher I), 570 U.S. 297 (2013), and Fisher v. Univ. of Texas at Austin (Fisher II), 579 U.S. 365 (2016)—a group of former military officers ("the Becton Group") submitted amicus briefs asserting that race-conscious admissions policies, a vague term for racial preferences, are crucial for our nation's security. In *Grutter*, the majority opinion referenced these officers' brief as a basis for determining that there is a compelling interest in allowing racial preferences. Indeed, the Grutter majority quoted the officers' claim that "the military cannot achieve an officer corps that is both highly qualified and racially diverse unless the service academies and the ROTC used limited raceconscious recruiting and admissions policies." Grutter, 539 U.S. at 331 (quoting Becton I) (emphasis in original).

In 2015, the Becton Group further claimed, in support of the University of Texas, that racial preferences are "critical to the Armed Forces' ability to defend our Nation's security." Becton III at 1. Accordingly, they argued that "[t]he military needs the flexibility to engage in efforts that go *beyond* outreach and recruiting

² See Consol. Br. of Lt. Gen. Julius W. Becton, Jr., et al. as Amici Curiae In Support of Resp'ts, Grutter v. Bollinger, 539 U.S. 306 (2003) (No. 02-241) ("Becton I"); Br. of Lt. Gen. Julius W. Becton, Jr., et al. as Amici Curiae In Support of Resp'ts, Fisher v. Univ. of Tex. at Austin, 570 U.S. 297 (2013) (No. 11-345) ("Becton II"); Br. of Lt. Gen. Julius W. Becton, Jr., et al. as Amici Curiae In Support of Resp'ts, Fisher v. Univ. of Tex. at Austin, 579 U.S. 365 (2016) (No. 14-981) ("Becton III").

to achieve critical officer diversity." *Id.* at 34-35 (emphasis added). In other words, they claimed the military's ability to use racial preferences in admissions decisions was essential to national security. These assertions were and are wrong.

I. Racial preferences are not necessary to achieve or maintain officer racial diversity—which now exists to a substantial degree. Regardless, officer racial diversity above some allegedly necessary level is neither "critical" to the military's ability to defend the Nation nor "indispensable to" national security. Compare Becton III at 34. No national security imperative serves as a compelling national interest to justify the use of racial preferences. In fact, history demonstrates that none of the factors that contributed to interracial military tensions during a discrete time in the past still exist.

II. To the contrary, the military's use of racial preferences today is unquestionably *harmful* to our national security. Such preferences are antithetical to the "selfless servant," colorblind culture necessary for our military to prevail on the battlefield.

As in the military generally, to the extent racial preferences have been employed at our military academies, they have been costly, inefficient, and, in some instances, have reduced quality. They have also ill served the intended minority-beneficiaries, who have failed in disproportionate numbers and have not increased combat effectiveness.

In short, officer racial preferences reduce combat effectiveness and weaken, rather than enhance, national security. Accordingly, any use of racial preferences in the military cannot support the kinds of racial preferences in which respondents engage.

ARGUMENT

I. No National Security Concern Provides a Compelling Interest Justifying Race-Based Admissions.

The argument that the United States has a national security interest in using racial preferences in the military is simply wrong. The national defense has long been carried out effectively without such preferences. And there is no serious evidence that they enhance the national defense one jota.

A. The National Defense Has Been Carried Out Effectively with a Meritocratic, "Colorblind" Military Culture.

Proponents of racial preferences in service academy admissions frequently point to racial tensions in the military during the Vietnam War to argue that racial preferences are essential to military effectiveness today.³ Focus on the Vietnam War is misplaced, however, and ignores the historical context of that war as well as dramatically changed circumstances today.

1. Before 1967, "racial animosity had been negligible within the U.S. armed forces," despite the lack of a formal "equal opportunity" program.⁴ When troops

³ See Becton I; see also Gerald F. Goodwin, *Black and White in Vietnam*, N.Y. Times (July 18, 2017), https://www.nytimes.com/2017/07/18/opinion/racism-vietnam-war.html.

⁴ James Maycock, *War Within War*, The Guardian (Sept. 14, 2001), https://www.theguardian.com/theguardian/2001/sep/15/weekend7.weekend3.

were first racially integrated during the Korean War, "practical measures outweighed racial beliefs," and the integration "failed to produce the violence or poor morale the military brass had expected."⁵

But, in the mid-1960s, a changing social environment, a controversial war, and new conscription strategies created a perfect storm for racial conflict. Volunteer recruiting and the "peacetime" draft in the early 1960s initially met manpower needs, but by mid-1966, as the war escalated, more troops were needed.⁶

To meet this growing need, Project 100,000 (POHT) was instituted, whereby entry standards were significantly lowered. Under this program, over 300,000 men were enlisted who had previously been (or would have been) rejected for low scores, insufficient education, and physical shortcomings. Black and Hispanic individuals comprised about 40% of these enlistments.

Almost half of all POHT recruits went to combat units because they could not qualify for skills in other units.⁹ The results were disastrous, with markedly

⁵ Walt Napier, A Short History of Integration in the U.S. Armed Forces, U.S.A.F. (July 1, 2021), https://tinyurl.com/3787ujrk.

⁶ The Military Draft During the Vietnam War, Mich. in the World (last accessed May 2, 2022), https://tinyurl.com/5t4ycvvk; see also Lisa Hsiao, Project 100,000: The Great Society's Answer to Military Manpower Needs in Vietnam, Viet. Generation (1989), https://tinyurl.com/5486fa79.

⁷ Buchanan Waller, *Inside the Pentagon's shameful effort to draft mentally disabled men to fight in Vietnam*, Task & Purpose (May 3, 2022), https://tinyurl.com/528f9ukd.

⁸ *Id*.

⁹ Clare Fitzgerald, *Project 100,000: The Controversial Recruiting Program of the Vietnam War*, War Hist. Online (Jan.

higher disciplinary problems and casualty rates. ¹⁰ In addition, disproportionate numbers of Black individuals were drafted in general because more white men obtained deferments by enrolling in college. ¹¹

Partly because of programs like POHT and the civil rights movement's spotlight on racial inequities, minorities became particularly vocal in opposing the Vietnam War. For example, the Black Panthers' Ten-Point Platform stated that "Black people should not be forced to fight in the military service to defend a racist government that does not protect us." Racial tensions were also exacerbated by the fact that America was emerging from a culture that had recently condoned segregation and anti-miscegenation laws.

Moreover, the Vietnam War soon became unpopular with Americans of all races. As the war dragged on with no perceptible progress and with significant casualties, the war, and the military as its symbol, became the subject of widespread protest, even violence, across the country. Disillusionment with the war and escalating racial tensions resulting in part from the

^{7, 2022),} https://www.warhistoryonline.com/vietnam-war/project-100000.html.

 $^{^{10}}$ *Id.* (noting that "around half of enlistees – 180,000 – were discharged 'under conditions other than honorable").

¹¹ Black Opposition to Vietnam, Amistad Digit. Res. (last accessed Apr. 25, 2022), https://www.amistadresource.org/civil_rights_era/black_oppositi on_to_vietnam.html.

¹² See *The Black Panther Party Ten-Point Program*, BlackPast (Oct. 15, 1966), accessible at https://tinyurl.com/ycys8f57; see also Lauren Mottle, "We Resist on the Grounds We Aren't Citizens": Black Draft Resistance in the Vietnam War Era, 6 J. Civ. & Hum. Rts. 26 (2020).

war's burden on Black servicemen made conflict inevitable, regardless of whether that conflict was related to racial issues.

Despite these challenging circumstances, thousands of minorities fought bravely and effectively in the Vietnam War. Of the total 58,220 Americans who died in Vietnam, 7,243 (12.4%) were Black.¹³ And twenty-two Black servicemembers who served there received the Medal of Honor (the military's highest award for combat valor), one of whom (Melvin Morris) is a VFM member.¹⁴

Still, several race-related incidents received significant media attention. These included protests (in mostly rear areas), and a few unit-level combat refusals that were apparently race related, before the military began instituting reforms to better accommodate Black servicemen.¹⁵

There is no credible evidence, however, that on a strategic level, our military effectiveness in Vietnam was materially compromised by racial tensions. Nor is there credible evidence that the discipline problems

¹³ DCAS Vietnam Conflict Extract File Record Counts by RACE OMB NAME (as of Apr. 29, 2008), Nat'l Archives (last accessed May 2, 2022), https://tinyurl.com/yeya2xn8.

¹⁴ Daniel Johnson, *These are America's Black Medal of Honor Recipients*, Task & Purpose (Feb. 22, 2022), https://taskandpurpose.com/history/black-medal-of-honor-recipients/; App. E at 39a.

¹⁵ Black History and The Vietnam War, a Story, Afr. Am. Registry (last accessed May 2, 2022), https://aaregistry.org/story/black-history-in-the-vietnam-war-a-brief-story/.

that did occur were generally the result of a disproportionately low number of Black officers.

This conclusion is confirmed by noted Army general and military historian H.R. McMaster, who wrote a widely praised and meticulously documented critique of the Vietnam War. He concluded that "The war in Vietnam was not lost in the field, nor was it lost on the front pages of the *New York Times* or on the college campuses. It was lost in Washington, D.C." Our strategic failure in Vietnam, therefore, was not the result of insufficient numbers of minority officers on the ground, in the air, or at sea.

2. In any event, two-and-a-half generations later, conditions in the military are markedly different. There is no draft, and the military is now an all-volunteer force, with significantly higher pay and benefits. Many more Blacks and Hispanics now attend college. ¹⁷ And, further decreasing the need for recruits that fueled the POHT, women have been joining the military in growing numbers: As of 2020 (while we were still engaged in the Afghanistan War), women comprised about 17% of the Department of Defense

¹⁶ H.R. McMaster, *Dereliction of duty: Lyndon Johnson, Robert McNamara, the Joint Chiefs of Staff, and the lies that led to Vietnam* 333 (Harper Collins 1998). Regarded by many as the most authoritative analysis of what led to the Vietnam war and its failure, McMaster attributes the debacle to repeated, incompetent decision-making and politically motivated deception at the highest levels of the executive branch and Defense Department.

 $^{^{17}}$ 2020 Demographics: Profile of the Military Community, Dep't of Def. (last accessed Apr. 30, 2022), https://download.militaryonesource.mil/12038/MOS/Reports/202 0-demographics-report.pdf [hereinafter "2020 Demographics"].

Active Duty force, with virtually all roles being open to women.¹⁸

Despite the end of conscription, today's military boasts large numbers of minorities. Thanks, in part, to aggressive minority recruiting and outreach, as of 2020, 24.2% of officers in the Active Duty total force were members of a racial minority (not including Hispanic ethnicity data) and 27% of Army officers (specifically) were members of a racial minority. Of that group, Black Army officers accounted for 12.3%—only about 1% less than the national Black population. ¹⁹ This is remarkable considering the military's competition with the private sector, which is under constant pressure to demonstrate diversity because of the current focus on environmental, social, and governance ("ESG") ratings for investments and corporate leadership. ²⁰

In contrast to the Vietnam War, moreover, Black service members now suffer disproportionately *fewer* casualties because of their tendency to serve disproportionately in noncombat roles: Although substantially overrepresented in the military as a statistical matter,²¹ Black servicemen "cluster pragmatically in noncombat units whose training in mechanics, electronics, and logistics translates well into civilian

¹⁸ *Id*. at 16.

¹⁹ *Id.* at iii. 24.

²⁰ See, e.g., Jim Tyson, Companies Must Venture into 'Jungle' of Approaches to ESG Ratings, CFODive (Mar. 23, 2022), https://www.cfodive.com/news/companies-must-venture-jungle-approaches-esg-ratings/620917/.

²¹ 2020 Demographics, supra note 17, at 22.

careers." ²² As a natural result, "[t]he proportion of blacks to whites is very much smaller in the combat arms than in other branches." ²³

This reality is reflected in the Army's FY 2020 Active-Duty Army statistics. For both officers and enlisted, those serving in "Operations" (combat arms) are disproportionally White, while those serving in "Force Sustainment" (non-combat arms) are disproportionally Black.²⁴

Not surprisingly, this racial disproportionality is reflected also in casualty statistics for the two largest U.S. military operations in the last 20 years, Operation Iraqi Freedom and Operation Enduring Freedom. In Operation Iraqi Freedom, of the 4,418 U.S. military deaths, non-minorities accounted for 3,645 (82.5%) and Black individuals accounted for 441 (10%).²⁵ In Operation Enduring Freedom, which took place primarily in Afghanistan, non-minorities accounted for 1,997 (85%) and Black individuals for 193 (8.2%) of the 2,349 U.S. military deaths.²⁶ In short, the casualties of

²² Sydney J. Freedberg, Jr., *The Fallen: A profile of U.S. troops killed in Iraq and Afghanistan*, Gov't Exec. (May 28, 2004) (quoting Maj. Gen. Robert Scales, USA, Ret.), https://tinyurl.com/276js9pe. This is, obviously, a rational choice for servicemen who (appropriately) see the military as a stepping-stone to a successful civilian career.

 $^{^{23}}$ *Id*.

²⁴ Strength Analysis & Forecasting Div., Off. of Dep'y Chief of Staff, G-1, Dep't of Army, Army Demographics: FY20 Army Profile (Sept. 30, 2020), https://tinyurl.com/57ztkayw.

²⁵ David A. Blum & Nese F. DeBruyne, Cong. Rsch. Serv., RL32492, American War and Military Operations Casualties: Lists and Statistics 16 (2020), https://tinyurl.com/4b99xy93.

²⁶ *Id.* at 12.

our most recent wars have not disproportionately burdened Black servicemen, despite their statistical overrepresentation (17.2%) in our military.

Finally, in contrast to the Vietnam era, societal attitudes toward the U.S. military have now become overwhelmingly positive and supportive, even though our wars in the Mideast lasted twice as long as the Vietnam War. ²⁷

3. Beyond these considerations, our nation's military culture was built on the principle of "selfless service" as part of an enlightened warrior ethos. Civilians, to become effective warriors, must acquire more than just the knowledge and technical training necessary to become effective warfighters on a lethal and unforgiving battlefield. Equally essential is that they undergo a significant and unnatural cultural transformation—one that includes a conscious, disciplined subordination of self, including of sub-group identities such as heritage, ethnicity and race—and assimilation to the norms of the organization. Subordination is not to be confused with abandonment. The warfighter must develop the capacity to put, sometimes for extended periods, self-interest completely out of mind. He/she must be able to trust every teammate as fully sharing that selfless culture, unreservedly committed to the organization and its mission, and to serving others without being concerned with self. Anything less is corrosive to the unit cohesion that, on the battlefield,

²⁷ D'Vera Cohn & Scott Funk, Chapter 5: The Public and the Military, in War & Sacrifice in the Post-9/11 Era 59 (Pew Rsch. Ctr. 2011), https://www.pewresearch.org/social-trends/2011/10/05/chapter-5-the-public-and-the-military/.

can make the difference between life and death and mission success or failure.

This culture requires that each warfighter see fellow warfighters as totally committed teammates, where race, ethnicity and heritage, while respected, do not matter. Some refer to that element of the culture as being "colorblind," an imprecise term, but one that is often heard in military circles.²⁸

This selfless-servant, "colorblind" culture is a national security imperative that is seriously weakened by racial preferences. As Sun Tzu said two thousand years ago, "he will win whose army is animated by the same spirit throughout all its ranks." ²⁹ Our warfighters are thus expected to ignore racial and other differences to be maximally effective on the battlefield. When bullets are flying and mortar shells landing, warfighters cannot and do not care about the race of their buddy or of their leaders. They must be (and are) willing to risk their lives for another warfighter, regardless of skin color. The actions of numerous VFM members exemplify this culture, and are well documented in the cases of VFM's twenty-one Medal of Honor recipients. See App. E at 38a.

The importance of this colorblind culture is also highlighted in the analysis by Lt. General Gregory Newbold, USMC, Ret., of the kind of culture that makes a military sufficiently effective to deter potential enemies and/or decisively win the Nation's wars.

²⁸ See, e.g., Dakota Wood, *Identity Politics and Critical Race Theory Have No Place in U.S. Military*, The Heritage Found. (Mar. 29, 2021), https://tinyurl.com/2p9y9jec.

 $^{^{29}}$ Sun Tzu, $\it The~Art~of~War~51$ (Courier Corp. ed. 2002) (5th c. BCE).

He wisely observed that "[a] military force's greatest strengths are cohesion and discipline. Individuality or group identity is corrosive and a centrifugal force *** [C]onformity creates efficiency and superior group results *** [W]hen we highlight differences or group identity, we undermine cohesion and morale. Failure results."³⁰

4. Such analyses contrast sharply with the Becton Group's prior (implicit) claim that warfighters respond more effectively when some of their leaders are of the same color. Such a notion is contrary to the battletested, colorblind warrior ethos. Warfighters instead want, and deserve, the best-qualified, most competent leaders, who will ensure they are properly trained and well-equipped and that the mission is well-planned and executed. This includes having the ability to make difficult decisions in response to changing, often ambiguous, circumstances sometimes instantly, with imperfect information and sometimes under fire. They know leader competence gives them the best chance to accomplish the mission and return safely.

Aircrews and those who are supported from the air similarly want the most competent pilots that can be found.³¹ Sailors want the most competent captains,

³⁰ Greg Newbold, A retired Marine 3-star general explains 'critical military theory,' Task & Purpose (Feb. 10, 2022), https://taskandpurpose.com/opinion/critical-military-theory/.

³¹ One example of such a pilot is medevac pilot Major General Patrick Brady, USA, Ret. His extraordinary courage and leadership are credited with saving thousands of lives on the battlefield, for which he received 10 valor awards including the Medal of Honor and Distinguished Service Cross. See App. E at 37a. His profile at the Military College of South Carolina can be found here: http://www.citadel.edu/root/images/patrick h brady pdf.pdf.

capable of making extraordinarily difficult decisions, sometimes under fire.

In short, all warfighters want, need, and deserve optimal leader competence and quality, undiluted by selection processes that employ preferences that, in turn, can compromise competence.

Indeed, combat itself, though vicious and barbaric, is a pure meritocracy that knows no preferences. That is why the more effective and better-led fighting force will generally defeat its opponent, regardless of other disparities.

This important point is exemplified in the 1965 Battle of Ia Drang at LZ X-Ray. In that battle, Lieutenant Colonel Hal Moore's superior leadership and that of his subordinate leaders, combined with the courage and discipline of his soldiers and supporting aviators (two of whom are Medal of Honor recipients), spared his untested battalion from being annihilated by a numerically superior force that also had the significant advantages of superior terrain and supply.³² Colonel Moore's race (he was White) was not an issue. His competence was quintessentially critical to the outcome, for both the mission and his soldiers of all races.³³

Similarly, the courage, bravery and resilience of our POWs, nearly all pilots, is exemplified by VFM's Air Force, Navy and Marine former POW members. See App. E at 41a.

³² See generally Harold G. Moore & Joseph L. Galloway, We Were Soldiers Once...and Young: Ia Drang—The Battle That Changed the War in Vietnam (Random House 1992).

³³ Moore retired as a three-star general and was widely praised as a military hero. See Mike Guardia, *Hal Moore: A Soldier Once* . . . *and Always* (Casemate 2021). One of Lt. Colonel Moore's

General McMaster made a similar point when he cautioned the Nation in 2021:

"The U.S. military must continue to evolve toward an institution in which all Americans, regardless of the color of their skin, can fully belong and enjoy equal treatment, because nothing is more destructive to teams than racism or any form of prejudice. But civilian and military leaders must not allow reified postmodernist theories to erode the sacred trust between warriors or diminish the meritocracy and objective realities that are essential to preserving the warrior ethos as the foundation of combat effectiveness." 34

In short, our country fails its moral obligation to its warfighters when merit in officer (or any) leader selection is diluted by preferences. "Qualified" isn't good enough. "Best-qualified" in such selections is our moral obligation to our future warfighters and to the Nation. Increased risk of casualties and of mission failure is the unacceptable price of allowing preferences to dilute merit.

platoon leaders who received the Medal of Honor for his heroism at LZ X-Ray is VFM member Colonel Joe Marm, USA, Ret. One of the helicopter pilots who repeatedly flew into enemy fire to support Moore's battalion during the battle and who received the Medal of Honor is VFM member COL Bruce Crandall, USA, Ret. See Appendix E. Their actions exemplify the selfless servant, warrior ethos necessary for survival and success on the battlefield.

³⁴ H.R. McMaster, Preserving the Warrior Ethos, Nat'l Rev. (Oct. 28, 2021), https://www.nationalreview.com/magazine/2021/11/15/preserving-the-warrior-ethos/.

B. There is No Competent Evidence That Race-Conscious Admissions Are Essential for Military Effectiveness.

The Becton Group nevertheless claimed in 2015 that the ability to use racial preferences in college and service academy admissions decisions is "indispensable" to national security.³⁵ This claim is unproven and, in fact, patently untrue.

1. There is no competent evidence that a particular percentage, or greater number, of minority military officers is needed for our military to effectively execute the national defense. Nor is there evidentiary support for the claim that officer racial demographic parity with enlisted members is essential to fielding an effective fighting force. Regardless of how the vague term "critical officer diversity" is defined, either by absolute number, by percentage, or by ratio, compared to the number of minority enlisted service members led by those officers, there simply is no evidence to support such a theory.

To the contrary, as explained above, the immutable human element of warfare requires a colorblind warrior ethos for trust, unit cohesion, and combat effectiveness. Thus, the premise that warfighters respond and perform more effectively when they see racial demographic parity, or a certain number, or a certain ratio, of minority officers among their leaders, is contrary to decades of warfighting experience of the U.S. military. It is also antithetical to the selfless-servant, colorblind culture that has been and will always be essential to our military's success on the battlefield.

³⁵ See Becton III at 34.

2. Implicit in the Becton Group's theory, moreover, is that racial preferences are necessary to achieve and maintain officer racial diversity. This notion is likewise untrue, particularly today. As noted earlier, 24.2% of the total Active Duty Officer Corps identified as Racial Minorities—without even including Hispanic ethnicity data.³⁶ That is, undeniably, "officer racial diversity." Moreover, it is well known that minorities are attending college in greater numbers, and that the military employs aggressive, well-funded minority outreach and recruiting programs, especially at the service academies.³⁷ Those circumstances no doubt account for the above numbers.

Thus, even if officer racial diversity could be proven essential to our military's ability to execute our national defense in 2022, suspension of the Equal Protection Clause and section 601 of the Civil Rights Act of 1964 would not be necessary for ROTC programs and our service academies to yield minority officers for the military.

At West Point, for example, the percentages of minority cadets in the classes of 2022-2025 were reported as 32%, 34%, 37%, and 40%, respectively.³⁸ These numbers are no doubt bolstered by the fact that West Point, for several years, has been graduating second

³⁶ 2020 Demographics, supra note 17, at 24.

³⁷ See, e.g., Diversity at West Point: Multi-Cultural By Design, U.S. Mil. Acad. (last accessed May 2, 2022), https://www.westpoint.edu/admissions/prospective-cadets/diversity.

³⁸ Class Profiles, U.S. Mil. Acad. (last accessed May 1, 2022), https://www.westpoint.edu/about/west-point-staff/g5/institutional-research/class-profiles.

generation ("legacy") minority cadets, a trend that will likely continue.³⁹

Further demonstrating that racial diversity can be achieved even without racial preferences is the significant numbers of Black servicemen in high-profile leadership positions in the last century. For example, of the three main service academies, the Superintendents of two (the U.S. Military Academy and the U.S. Air Force Academy) are Black.⁴⁰ In addition, Colin Powell's military achievements led to his becoming the first Black Secretary of State.⁴¹ While only three of the current forty-one four-star generals are Black (one being the Chief of Staff of the Air Force), part of this is likely due to the disproportionate (and understandable) preference of Black service members for noncombat roles, as explained above.⁴²

³⁹ Interviews, Race in the Military, W. Point Ctr. for Oral Hist. (last accessed May 7, 2022), https://tinyurl.com/y6n4t6kx; W. Point Ass'n of Graduates Dev. Off., A Family's Impact on West Point, Together We Lead (Spring 2022) (describing the family of a 1978 Black graduate, two of whose sons graduated in the classes of 2005 and 2011, with three of the family members having worked in the Admissions Office, one as an Outreach Officer).

⁴⁰ See *Lieutenant General Richard M. Clark*, U.S.A.F. (Oct. 2020), https://tinyurl.com/ykcwefan; *Lieutenant General Darryl A. Williams*, U.S. Mil. Acad. (last accessed May 6, 2022), https://www.westpoint.edu/about/superintendent.

⁴¹ Off. of Historian, U.S. Dep't of State, *Biographies of the Secretaries of State: Colin Luther Powell (1937–2021)* (last accessed May 6, 2022), https://history.state.gov/departmenthistory/people/powell-colin-luther.

⁴² List of active duty United States four-star officers, Wikipedia (last accessed May 6, 2022),

For all these reasons, racial preferences are not necessary to achieve a military that welcomes and attracts talented recruits of all races. At a minimum, the Becton Group's contrary claim is unproven.⁴³

II. National Security Is Better Served When Military Officer Accessions Are Race-Neutral and Exclusively Merit-Based.

Successful execution of our Nation's defense, moreover, *requires* that military officer accessions (the entry or reentry of officers into service), including college ROTC and service academy admissions (and assignments and promotions) be race neutral and exclusively merit based. ⁴⁴ Anything less than a race-neutral meritocracy would jeopardize our national defense because use of racial preferences is highly detrimental to military effectiveness.

https://en.wikipedia.org/wiki/List_of_active_duty_United_States_four-star_officers.

⁴³ Given the clear evidence on this point, moreover, there would be no basis for deferring to military authorities if they claimed, contrary to the facts, that racial preferences remain necessary to that goal. See, *e.g.*, *Anderson* v. *Laird*, 466 F.2d 283 (D.C. Cir. 1972) (holding that cadets and midshipmen at military academies could not be forced to attend religious services in violation of their constitutional rights).

⁴⁴ A merit-based system would consider all factors deemed relevant, including, in officer accessions, such things as an individual candidate's having overcome documented socioeconomic disadvantage or family hardship in a manner clearly demonstrating leadership potential, so long as it is uniformly considered, race-neutral, proportional to other factors, and not used as a proxy for race. This would not apply to military officer assignments or promotions, where merit must be judged based

A. Racial Preferences Reduce Military Effectiveness.

Racial preferences reduce military effectiveness partly because of our society's dominant definition of "diversity" as purely a product of identity characteristics, such as gender and race, as opposed to varied professional and personal experiences. As a retired brigadier general stated, "[r]ather than diverse experiences, backgrounds, and perspectives—that promote healthy group decisions and outcomes—'diversity' has come to mean only race, ethnicity, and sex." ⁴⁵

1. For several reasons, this fixation on race can only foster a culture of arbitrary advancement, disunity, and frustration.

First, racial preferences blindly presuppose victimhood and disadvantages for minorities merely because of skin color and a corresponding advantage for nonminorities merely because of skin color. But, in fact, many non-minorities face socioeconomic or other hardships in their lives, and many minority applicants come from well-educated, supportive families that are economically stable. These race-based preferences are thus inherently inaccurate in identifying the most deserving applicants who have overcome adversity.

Second, racial preferences also demean high-performing minority individuals by tainting any recognitions they earn with the suspicion that their race tipped the scale in their favor compared to non-

upon demonstrated performance and potential to perform effectively at the next higher grade.

⁴⁵ Chris Petty, *How today's 'diversity' damages our military*, Am. Thinker (Mar. 19, 2022), https://tinyurl.com/27y7647y.

minority candidates. This "affirmative action" environment makes it impossible to know whether a promotion was earned by demonstrated performance or, rather, was a "diversity promotion," compromising the presumption of merit that should accompany the promotion. Lacking that presumption only adds to the leadership burden of the promoted officer.

Third, racial preferences sometimes result in less than the best-qualified persons being selected as leaders. Not only does this result in less-than-the-best-available leadership in high-stakes situations, but it also erodes trust in the integrity of superiors. Those who are passed over for promotions and admissions are led to suspect that superiors are concealing the use of racial preferences and mischaracterizing functional racial quotas as "goals." Trust in leaders is a *sine qua non* for combat effectiveness: Warfighters, especially when in difficult circumstances, don't respond as effectively to leaders whom they distrust. 46

2. A substantial body of evidence also suggests that this emphasis on non-merit-based advancement in the military leads to higher levels of dissatisfaction and attrition.

For example, a recent study by Falk and Rogers suggests that an emphasis on non-merit-based advancement in the military may, in fact, be driving qualified officers out of the service.⁴⁷ In this study, researchers from the Harvard Kennedy School interviewed two groups of officers, some who were active

⁴⁶ *Id*.

⁴⁷ Sayce Falk & Sasha Rogers, *Junior Military Officer Retention: Challenges and Opportunities* (Kennedy Sch. of Gov't, Harvard Univ. 2011), https://tinyurl.com/2p8v8bpt.

duty and others who had left the service. Seventy-one percent of active duty officers responded that more of the best young officers would stay if the military offered better assignments to the best officers, and 85% of officers who had left the service agreed. 48 Additionally, when asked if the military personnel system did a good job of weeding out weak leaders, only 18% of active duty officers said yes, and only 10% out of the service agreed. 49 Moreover, none of the study's several recommendations for improving officer retention mentioned any need for increased emphasis on racial or ethnic diversity, any need for more minority officers, or any need for racial preferences. These findings are concerning and suggest that many officers believe some factor or factors other than merit are being used to make advancement decisions.⁵⁰

3. This troubling tension between achieving racial diversity and rewarding merit is not waning. For example, the military recently eliminated the inclusion of official photographs in personnel files that are considered by promotion boards. The stated purpose was to eradicate any bias. But, when the racial diversity of the officers selected decreased without photographs in the records, Vice Admiral John Nowell, the Navy's Chief of Personnel, suggested photographs should be reinstated. He said, "We're very clear with our language to boards that we want them to consider

⁴⁸ *Id.* at 63.

⁴⁹ *Id*.

⁵⁰ Id. at 37-38.

diversity across all areas***. I think having a clear picture just makes it easier."⁵¹

Similarly, *Amicus* received the following communication from a reliable source regarding the Army's recently revamped command selection board procedures: "An experienced general officer, who has been involved in selections of officers for command positions, stated that race was definitely a factor in command selection. He told officers who were being considered for command that, if it appeared that the selection board would not have a sufficient number [of] Black officers on the command selection list based upon the objective rating criteria, a Black officer with lower scores would be added to the command list, over White officers with higher scores/ratings." 52

Perhaps to explain policies such as these, the current Secretary of Defense was recently quoted as saying, "[w]e are going to make sure that our *** leadership looks like what's in the ranks of the military." Since the military wear uniforms, he was obviously not referring to their clothing. Evidently, he was referring to skin color, as part of a thinly veiled announcement

embrace-wokeness-undermining-ability-wage-war-critics-warn.

⁵¹ Harry Jackson, Opinion, Should Military Officers Be Chosen By Race?, Wall St. J., (Aug. 19, 2021), https://www.wsj.com/articles/military-officers-affirmative-action-identity-politics-diversity-and-inclusion-national-security-11629402318.

⁵² Confidential written communication to counsel for *Amicus* (Nov. 23, 2021) (on file with counsel).

⁵³ Aaron Kliegman, Pentagon's Embrace of Wokeness Undermining Ability to Wage War, Critics Warn, Just the News (Feb. 24, 2022), https://justthenews.com/government/security/pentagons-

of a policy of racial balancing in our military. Thus, the policy of using racial preferences in officer command selection and promotions, under the vague guise of "inclusion," has begun to proliferate, necessarily diluting merit selection, compromising leader quality, demeaning those involved, eroding morale, and reducing overall military effectiveness.

4. Such policies have potentially cataclysmic implications for national security. One formerly high-ranking member of the Joint Staff explained that such policies contribute to our potential adversaries' becoming less likely to be deterred from aggressive military action and more likely to draw us into war.⁵⁴ A retired Navy Captain reached a similar conclusion.⁵⁵

These are examples of *Grutter*'s consequences in the military. Our current military has become brazen in its use of racial preferences in officer assignments and promotions, ignoring the Equal Protection Clause and section 601 of the Civil Rights Act of 1964. The disingenuous claim that racial preferences are "essential to national security" is a contrived attempt to withstand strict scrutiny and unsupported by any competent evidence, much less the convincing body of evidence that should be required before so drastic a step as ignoring the Constitution is permitted. And, as explained, the current use of racial preferences in

⁵⁴ Greg Newbold, *How Woke U.S. Military Leaders Make U.S. Enemies More Likely to Start a War*, The Federalist (July 29, 2021), https://thefederalist.com/2021/07/29/how-woke-u-s-military-leaders-make-u-s-enemies-more-likely-to-start-a-war/.

⁵⁵ Phillip Keuhlen, *Does the Navy's New Emphasis on 'Diversity' Put the Nation at Risk?*, Am. Greatness (Nov. 5, 2021), https://tinyurl.com/mr2mukyt.

the military actually erodes trust, undermines unit cohesion, and compromises military effectiveness.

B. The Service Academies' Experience With Racial Preferences Illustrates This Threat To National Security.

Military academies, once the gold standard for excellence and personal accountability, now fully reflect this trend of racial preferences diluting merit. Data from West Point and the Naval Academy demonstrate that racial identity plays a significant role in admissions, and, as a result, minority students are disproportionately failing at these schools.

For example, research conducted on 1990s admissions data from West Point showed there were "155 Asian rejectees (43 percent) and 1,647 white rejectees (33 percent) who ha[d] both math and verbal SATs equal to or higher than the black admittee math and verbal SAT medians . . . [and] 160 Asians (38 percent) and 2,626 whites (37 percent) [were] rejected by the U.S. Military Academy who attained a class rank equal or better than the rank of the black admittee median." ⁵⁶

This same research paper used similar admissions data from the United States Naval Academy to estimate the odds of acceptance at the Academy based on the applicant's race. Using "ethnic group membership, gender, SAT scores, and high school rank as predictor variables," the researchers estimated that the "black-to-whites odds of admission are 4.44 to 1, the Hispanic-to-white odds are 3.32 to 1, and the Asian-to-white

⁵⁶ Robert Lerner & Althea K. Nagai, *Preferences in the Service Academies* 11, Ctr. for Equal Opportunity (Oct. 16, 2006), https://tinyurl.com/4xzb8prd.

odds are 0.67 to 1.2."⁵⁷ These racial disparities reflect significant harm to less favored races seeking admission.

Another researcher who examined data provided by the U.S. Military Academy found similar results. His examination of demographic data for the classes of 2000 to 2020 showed substantial differences in standards, specifically, substantially lower scores and higher admissions rates for Black individuals, and to a lesser extent Hispanic individuals, compared to White and Asian individuals. The author concluded that the academy intentionally seeks racial diversity and is willing to alter its admissions standards to achieve it.⁵⁸

The same study found that performance for cadets who graduated tracked demographic SAT trends, with the composite grade point average (for academic, military, and physical performance during the 4-year period, called "CQPA"), averaging 3.06 for Asian individuals, 3.02 for White individuals, 2.76 for Hispanic individuals, and 2.51 for Black individuals.⁵⁹ Attrition rates followed the same trend, with the Asian rate at 17%, the White rate at 21%, the Hispanic rate at 24%, and the Black rate at 31%.⁶⁰

The researcher concluded that, in deliberate pursuit of class composition goals, the Academy employs race-based admission strategies and that these

⁵⁷ *Id.* at 8.

⁵⁸ On Diversity as Strength, usmaData (June 10, 2018), https://usmadata.com/2018/06/10/on-diversity-as-strength/.

 $^{^{59}}$ *Id*.

⁶⁰ *Id*.

strategies include extension of "preferences to minority candidates who, on average, have significantly lower SAT scores than non-minority candidates who have higher SAT scores." He also noted that Academy racial diversity admissions ("class composition") goals are explicitly identified.⁶¹

The researcher further showed that, to achieve class composition goals for minorities, the Academy admits "marginally qualified candidates with a known and higher probability of failure [and that] marginally qualified candidates are failing by the Academy's own metrics." He further concluded that "more marginal performers are graduating into the Army *** [while] marginally qualified candidates [as cadets] consume resources to try to get to graduation, and take up slots that other, available, better qualified individuals could have filled ***." 63

The researcher further observed that "[t]here are real and tangible costs to pursuing the diversity strategy, and no supporting quantifiable argument [is] offered for pursuing the strategy." He concluded that the academy "is deliberately seeking and tolerating low performance and accepting high failure rates that hurt cadets to meet arbitrary student body composition goals by skin color." When the data are examined critically, the researcher observed, it is clear that

⁶¹ *Id*.

 $^{^{62}}$ *Id*.

 $^{^{63}}$ *Id*.

⁶⁴ *Id*.

⁶⁵ *Id*.

this strategy yields "worse outcomes" than would result if racial preferences were not used. 66

This harmful emphasis on race is also reflected in the Navy's recent decision, described above, to cease "blind review" of personnel files by officer promotion boards after the blind reviews led to fewer minority promotions than before. If the objective is to find the most qualified candidate, it is unclear how a photograph's revealing race or ethnicity is relevant to a promotion selection decision—as opposed to being guided in that decision solely by the record of the officer's experiences and performance reports—would further this goal. Although the officer promotion procedure is distinct from the admissions procedures at service academies, statements like these by high-ranking military officials reveal a leadership mindset toward training and selecting officers that values race for its own sake, rather than merit.

In short, in the military as elsewhere, as the Chief Justice wrote in *Parents Involved in Community Schools* v. *Seattle School District No. 1*, treating racial balancing as an end in itself would effectively ensure that race will always be relevant in American life, and that the "ultimate goal of eliminating entirely from governmental decision-making such irrelevant factors as a human being's race will never be achieved." 551 U.S. 701, 730 (2007) (internal quotation marks omitted). And in the military setting, racial balancing affirmatively harms rather than promotes national security.

 $^{^{66}}$ *Id*.

CONCLUSION

Our nation's security is of paramount importance, and race-conscious admissions and promotions in the military lessen this security by undermining, rather than advancing, the compelling interest in a strong military. While military recruiting that promotes diversity by, for example, conducting extensive outreach to all racial demographics is laudable, efforts to engineer racial diversity through racial preferences in admissions decisions, at the expense of equal treatment, inevitably fail to enhance necessary military effectiveness. Accordingly, the alleged need for racial preferences in the military cannot reasonably be invoked to support the kinds of racial preferences in which respondents engage.

Respectfully submitted,

GENE C. SCHAERR

Counsel of Record

ERIK S. JAFFE

H. CHRISTOPHER BARTOLOMUCCI

HANNAH C. SMITH

KATHRYN E. TARBERT

JORDAN E. SMITH

ANNIKA M. BOONE*

SCHAERR | JAFFE LLP

1717 K Street NW, Suite 900

Washington, DC 20006

(202) 787-1060

gschaerr@schaerr-jaffe.com

CLAUDE M. MCQUARRIE III MCQUARRIE LAW OFFICE 20887 Sweetglen Drive Porter, TX 77365

Counsel for Amicus Curiae

* Not yet admitted to the D.C. bar. Practicing under the supervision of D.C. Bar members pursuant to Rule 49(c)(8).

May 9, 2022

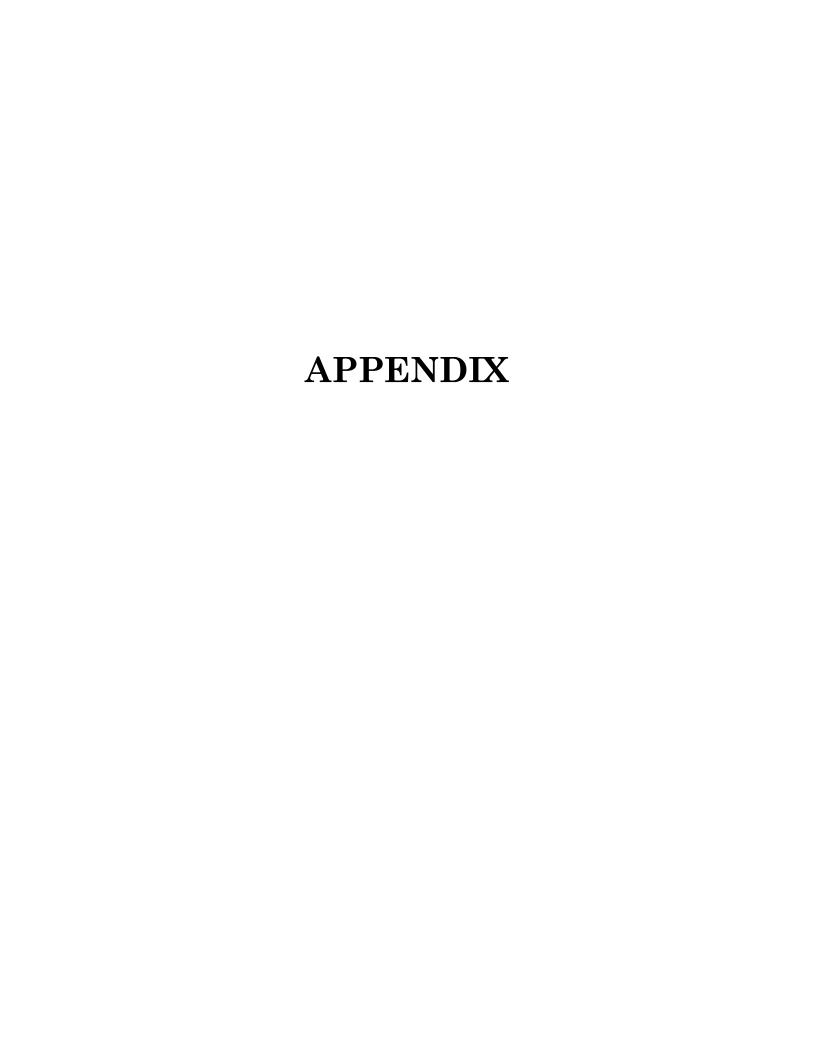


TABLE OF APPENDICES

Appendix A:	
VFM Member ListApp	. 1a
Appendix B:	
VFM Membership Demographics and Accomplishments	14a
Appendix C:	
Paygrades and Corresponding RanksApp.	21a
Appendix D:	
VFM Special Recognition and Senior	
Leadership Summary App.	27a
Appendix E:	
VFM Medal of Honor Recipients	
and Prisoners of WarApp.	38a

Appendix A

VFM MEMBER LIST

TOTAL MEMBERS: 627^{1,2}

ARMY

GEN Bell, Burwell III LTG Anonymous GEN Brown, Arthur Jr. LTG Anonymous GEN Anonymous³ MG Andreson, Ronald LTG Crocker, George MG Brady, Pat MoH⁴ LTG Fields, Harold Jr. MG Childers, Carroll LTG Johnson, James Jr. MG Cole, Thomas LTG Mixon, Benjamin MG Csrnko, Thomas LTG Ohle, David MG Dozier, James LTG Spigelmire, Michael MG Graham, Todd LTG Trefry, Richard MG Hagan, Craig LTG Ulmer, Walter MG Hamilton, Mark LTG Woodmansee, John MG Harrell, Gary

 $^{\rm 1}$ Membership data as of May 9, 2022. Current membership information may be accessed at https://bit.ly/VFMpublicdocs.

² For explanation of rank abbreviations, see *Appendix C*.

³ At the time of enrollment, members were asked to indicate whether they authorized the inclusion of their name in a member list that would accompany this brief. Those who withheld such authorization are listed here anonymously.

⁴ MoH denotes Medal of Honor Recipient.

MG Horst, Karl	COL Bridges, Gary
MG Jackson, James	COL Briggs, Richard
MG Nichols, Stephen	COL Brooks, Johnny
MG Raines, William Jr.	COL Burcham, Jerry
MG Anonymous	COL Choppa, Robert
MG Anonymous	COL Clarke, Bruce
MG Anonymous	COL Crandall,
MG Anonymous	Bruce MoH
BG Bahnsen, John Jr.	COL Crosby, George
BG Audino, Ernie	COL Dillon, Robert
BG Crow, John	COL Donaghy, Michael
BG Foust, Jerome	COL Donlon, Roger MoH
BG Marshall, Jeffery	COL Fegan, Charles
BG Nicholson, John	COL Ford, Michael
BG Petty, Chris	COL German, Abraham
BG Stringham, Joseph	COL Godwin, James Jr.
BG Trifiletti, Anthony	COL Greco, George
BG Zais, Mitchell	COL Hadden, Mayo III
BG Anonymous	COL Hansen, Mark
BG Anonymous	COL Hathaway, John
COL Ballard, Don MoH	COL Hoffman, Jeffrey
COL Barnes, Thomas	COL Hueman, Thomas
COL Baxter, Vicki	COL Hug, Jack
COL Benson, John	COL Hughes, William
COL Bolinger, Marvin	COL Hurtado, Arthur
COL Bondshu, Arthur	COL Jackson, Joseph Jr.
COL Bowman, Greg	COL Johnson, Bradley
COL Bramblett, Howard	COL Kitterman, Jay

COL Kushner, F. Harold	COL West, Sterling
COL Lackey, Alan	COL Williams, Harold Jr.
COL Lentz, Carl	COL Zais, Barrie
COL Marm,	COL Anonymous
Walter Jr. MoH	COL Anonymous
COL Mastrovito, Nick Jr.	COL Anonymous
COL Mejasku, Joseph	COL Anonymous
COL Merrill, Will III	COL Anonymous
COL Mowery, James	COL Anonymous
COL O'Connell,	COL Anonymous
James Jr.	COL Anonymous
COL Padgett, Michael	COL Anonymous
COL Palmatier, Bruce	COL Anonymous
COL Prince, William	LTC Adams, John Jr.
COL Quackenbush,	LTC Altobello, Roy
Robert	LTC Armstrong,
COL Redmond, Lawrence	Council Jr.
COL Savory, Carlton	LTC Bahnsen, Peter III
COL Scannell, John	LTC Bailey, William
COL Shipley, Richard	LTC Barbee, Elmer
COL Shippee, Ronald	LTC Benson, Roy
COL Sipantzi, Vahan	LTC Benway, Kenneth
COL Stefan, James Sr.	LTC Bireley, Judson
COL Surdu, John	LTC Bradley, John
COL Thiessen, LaVoy Jr.	LTC Brauer, Albert II
COL Tobin, John	LTC Brown, Royal III
COL Totten, Robert	LTC Cerrone, Michael
COL Vernon, Frederick II	LTC Coombs, John
COL Webb, Gerald	LTC De Moya, Rick

MAJ Coleman, William CPT Hargis, James MAJ Dumais, Richard CPT Hoppe, Thomas MAJ Dynes, John CPT Hurley, Jeanell MAJ Griffin, John CPT Ishimoto, Wade MAJ Miller, John CPT Jones, Cliff MAJ Morin, Mark CPT Kim, Jimmy MAJ Norris, Timothy CPT Lentini, Anthony Jr. MAJ Rice, Frederick C. CPT Lukehart, Paul MAJ Rodriguez, CPT Maguire, Stephen Wilfred Jr. CPT McDougald, Charles MAJ Shimp, Robert CPT McKeown, John MAJ Smith, Mark CPT McQuarrie, Claude III MAJ Sugdinis, Joel MAJ Taylor, James MoH CPT Merrill, Mike CPT Minshew. MAJ Whitner, Glen Charles Jr. MAJ Anonymous CPT Mitchell, Eugene MAJ Anonymous CPT Moore, Earl MAJ Anonymous CPT Musser, Kurt MAJ Anonymous CPT Nerdahl, John CPT Camacho, Isaac CPT Newgent, Matthew CPT Carson, Craig CPT Qualls, Kendall CPT Chin, Johnson CPT Reams, Larry CPT Coughlin, David CPT Rodriguez, Leo CPT Cunningham, David CPT Sarpen, Gary CPT Davis, Donald CPT Shook, Tommy CPT Evans, Brad CPT Sorrow, Jerry CPT Gemberling, Dean CPT Gregory, William CPT Vinson, Douglas

CPT Wood, David	CSM Anonymous
CPT Anonymous	CSM Anonymous
CPT Anonymous	MSG Denham, Daniel
CPT Anonymous	MSG Foster, Paul
CPT Anonymous	MSG Guerra, Jose
CPT Anonymous	MSG Petry, Leroy MoH
1LT French, William	1SG Phillips, James
1LT McLaughlin, Eugene	MSG Sinyard, Cletis
1LT Prosser, Donald	MSG Wardlow, Eric
1LT Anonymous	MSG Winnewisser,
1LT Anonymous	Edward
CW5 Adair, Michael	MSG Woodhead, Robert
CW5 Wilke, Daniel	MSG Anonymous
CW4 Harbin, Michael	SFC Davis, Sammy MoH
CW4 Talton, Michael	SFC Ford, Patrick
CW4 Watkins, Roger	SFC Heid, Eric
CW4 Mooney, James Jr.	SFC Mansour,
CW4 Anonymous	Rouhana IV
CW2 Samuels, Stanley	SFC Morris, Melvin MoH
SGM Anderson, John	SFC Van Ness, William
CSM Armandariz,	SFC Anonymous
Roberto	SSG Byrd, Don
SGM Giglia, David	SSG Corcoran, Stephen
SGM Gleason, Edward Jr.	SSG Grounds, Phill
SGM Holcom, Floyd	SSG Hempel, Steven
SGM Hux, Will	SSG Largent, Joshua
SGM Johnson, Gregory	SSG Meyer, John
CSM Leon, Angel	SSG O'Neil, Jimmie
CSM Snider, Ernest	SSG Romesha, Clint MoH

SGT Grimaldi, Saverio SGT Harlow, Robert SGT Krutina, Danny SP5 McCloughan, James MoH SGT Moran, J. Blair SGT Pauley, Danny Joe SGT Roeder, Robert SP4 Abijaoude, Oswaldo SP4 Black, Doug SP4 Caspary, Louie SP4 Fitzmaurice, Michael MoH SP4 Llewellyn, Henry SP4 True, Jessica SP4 Webb, Jimmy PFC McKeever, William

NAVY

ADM Johnson, Jerome ADM Smith, Leighton VADM Emery, George VADM Robinson, David RADM Bremner, Bruce RADM Byrd, John RADM Dantone, Joseph RADM Flatley, James III RADM Johnson, J. Michael RADM Newman, William RADM Anonymous RDML Christenson, Ronald RDML Long, Noah Jr. RDML Scott, Hugh CAPT Bailey, Larry CAPT Burbage, Charles CAPT Carey, David CAPT Cargill, Lee CAPT DeWitt, Paul CAPT Donahue, Conrad CAPT Estes, Edward CAPT Flanagan, Thomas CAPT Knutson, Rodney CAPT Mann, John CAPT McDaniel, Eugene CAPT Metzger, William CAPT Plumb, Joseph Jr. CAPT Ramsey, Brenton CAPT Reinhold, Baron CAPT Rumph, Scott CAPT Schery, Mike CAPT Schoeffel, Peter CAPT Sheridan, Robert

CAPT Stafford, Perry CDR Anonymous CAPT Stratton, Richard LCDR Barnes, George CAPT Tredennick, Harry LCDR Daley, Thomas CAPT Treis, Robert LCDR Davey, Bruce CAPT Tulley, James Jr. LCDR Herman, Roger CAPT Tuma, David LCDR Jackson, Harry CAPT Tupacz, Eugene Jr. LCDR Jasser, M. Zuhdi CAPT Ward, Jack LCDR Knudson, Thomas CAPT Williams, Lewis LCDR Neumann, Robert CAPT Anonymous LT Horne, Alvin CAPT Anonymous LT McCain, Todd CAPT Anonymous LT McCauley, William CDR Antrim, Stanley LT O'Neill, John CDR Bowen, John LT Pigeon, Lawrence CDR Carpenter, Allan LT Reinhold, Eric CDR Clifford, Bill LT Saacke, Paul CDR Hewitt, Frank LT Sawyer, Willits CDR Hinckley, Robert LT Simmons, Derek CDR Keuhlen, Phillip LT Spancake, Steven CDR Martin, George LT Stearns, Theodore CDR Mobilia, Ross LT Thornton, Michael MoH CDR Murchison, Grover LT Anonymous CDR Shankel, William LTJG Flynn, James CDR Thornton, Gary LTJG Sacco, Joseph CDR Wheat, David LTJG Weekley, Richard CDR Young, Richard ENS Worrell, Stewart CDR Anonymous CDR Anonymous CWO4 Chaudoin, Thomas SCPO Jones, Clifford L.
PO2 Fey, David
PO2 Forke, Edward
PO2 Peterson, L. Carl
PO2 Anonymous
PO3 Ingram,
Robert MoH
PO3 Mann, Ricki
PO3 Turpin, Trayntor
PO3 Anonymous

AIR FORCE

Gen Dugan, Michael
Gen Fogleman, Ronald
Gen Hostage, Gilmary III
Gen Kutyna, Donald
Gen O'Loughlin, Earl
Gen Smith, Lance
Gen Anonymous
Lt Gen Bishop, Robert Jr.
Lt Gen Brown, Richard
Lt Gen Coolidge,
Charles, Jr.
Lt Gen Hamm, Charles
Lt Gen Kelley, Jay
Lt Gen Kinnan, Timothy
Lt Gen Kwast, Steven

Lt Gen Remington, Jeffrey Lt Gen Anonymous Maj Gen Baldwin, Charles Maj Gen Borling, John Maj Gen Bracken, Edward Maj Gen Collins, Richard Maj Gen Comer, Richard Maj Gen Commons, David Maj Gen Fortner, Larry Maj Gen Halloran, Patrick Maj Gen Hunt, James Maj Gen MacLane, Bruce Maj Gen Marr, Richard Maj Gen McBroom, John Maj Gen Miller, John Jr. Maj Gen O'Mara, Raymund Maj Gen Post, David S.

Maj Gen Rayburn,

Maj Gen Smith, Perry

Bentley

Maj Gen Scott, Winfield III

Maj Gen Winters, Col Cordier, Kenneth John Jr. Col Crum, William Maj Gen Anonymous Col Desilets-Bixler, Nicole Maj Gen Anonymous Col Fer, John Maj Gen Anonymous Col Hungerbeeler, Maj Gen Anonymous Henry Sr. Brig Gen Ball, William Col Jackson, Jackie Brig Gen Bundy, Richard Col Kirk, Thomas Jr. Brig Gen Carr, Chalmers Col Long, Gordon Brig Gen Cubero, Ruben Col Mac Isaac, Richard Brig Gen Fleming, Col Maness, Robert Thomas Brig Gen Goodrich, Dan Col Meck, Tracey Brig Gen Johnston, Col Moe, Thomas James III Col Morgan, Sherman Brig Gen Mansfield, Col Nations, William Robert Jr. Col Parker, Amy Brig Gen Mueh, Hans Col Parker, Roy II Brig Gen Rinebarger, Col Paulson, Ajrn Teddy Col Pefley, Michael Brig Gen Welch, William Col Perini, Michael Brig Gen Anonymous Col Petersen, Barbara Brig Gen Anonymous Col Peterson, Kurt Col Austin, William II Col Robinson, Paul Jr. Col Bending, Michael Col Rybak, Richard Col Brockman, John Col Scott, Ronald Jr. Col Brown, Kenneth Jr. Col Seares, David Col Certain, Robert Col Colter, Craig Col Stutz, Leroy

Col Torreano, Mark Sr.	Lt Col Piowaty, John
Col Vogel, Richard	Lt Col Potter, Gary
Col Waddell, Dewey	Lt Col Schlabs, Glenn
Col Webb, Ronald	Lt Col Schwertfeger,
Col Wells, William	William
Col Wray, James	Lt Col Sherman, John
Col Zietlow, James	Lt Col Staiger, Kathryn
Col Anonymous	Lt Col Tingman, Kenneth
Col Anonymous	Lt Col Anonymous
Col Anonymous	Lt Col Anonymous
Lt Col Austin, William C.	Lt Col Anonymous
Lt Col Ayres, Tim	Lt Col Anonymous
Lt Col Bone, Gary	Lt Col Anonymous
Lt Col Brown, Robert II	Lt Col Anonymous
Lt Col Cliatt, Jeffrey	Lt Col Anonymous
Lt Col Dolan, Michael	Lt Col Anonymous
Lt Col Fletcher, Keith	Maj Carlin, Bernard
Lt Col Gauntt, William	Maj Craig, Patricia
Lt Col Gervais, Thomas	Maj Crecca, Joseph
Lt Col Gimarc, John	Maj Hipps, Robert
Lt Col Greer, Charles Jr.	Maj Jones, Robert
Lt Col Hamlin, Kenneth	Maj Rose, Michael
Lt Col Hannen, John Jr.	Maj Seifert, Robert
Lt Col Hess, Jay	Maj Smith, Robert J.
Lt Col LeCato, Harvey	Maj Zawacki, Robert
Lt Col Mastin, Ronald	Maj Zielinski, David
Lt Col Mosher, Duane	Maj Anonymous
Lt Col Nance, Keith	Maj Anonymous
•	- · · · · ·

Capt Beecham, Brent Capt Chambers, Carl Capt Ebner, David Capt Grant, Cecil, Jr. Capt Green, Linda Capt Haugh, Dennis Capt Karr, Jordan Capt Lyle, Richard Capt Marvel, William Capt Mastrovito, Rita Capt Pettyjohn, Karen Capt Sturman, John Capt Wells, Kenneth Capt Anonymous Capt Anonymous Capt Anonymous Capt Anonymous Capt Anonymous Capt Anonymous CMSg Battle, Kenneth MSgt White, Sarah

MARINES

LtGen Hailston, Earl LtGen McCorkle, Frederick MajGen Krupp, Dennis MajGen Kuklok, Kevin MajGen Livingston, James MoH BrigGen Weise, William Col Barnum, Harvey Jr. MoH Col Beavis, Robert Col Couvillon, David Col Fischer, Robert Col Hanvey, Stephan Col Landes, Burrell Col Leighton, David Col Modrzejewski, Robert MoH Col Patrow, Michael Col Sime, Colben Jr. Col Vargas, Jay MoH Col Welch, Patricia Col Anonymous LtCol Bailey, Richard LtCol Cathcart, Donald LtCol Cole, Jeffrey LtCol Collins, Raymond LtCol Cooper, Kenneth LtCol Fiorillo, Michael LtCol Hilton, Judson LtCol Smith, Richard LtCol Swindle, Orson Maj Bloom, David Maj Marmon, Anthony

Maj Anonymous Capt Alstad, John Capt Brooks, Robert Capt Buckley, Rich Capt Hapke, Norman Jr. Capt Kleiboeker, Ronald Capt Lottie, Richard Capt McEncroe, Jack Capt Papineau, Thomas Capt Park, Brian Capt Redmond, Thomas Capt Regan, John Capt Ryman, Michael Capt Zobenica, Ronald Capt Anonymous CWO4 Williams, Hershel MoH SgtMaj Chevalier, Paul MGySgt McCartney, Lawrence MGySgt Anonymous MSgt Franklin, David Sgt Bolinder, Thomas

Sgt Eden, Judith

Cpl Birdsong, Grady Cpl Prestanski, Harry

Sgt O'Malley, Robert MoH

Maj Anonymous

Cpl Rohrer, Robert

COAST GUARD

VADM Thorsen, Howard RADM Day, Steven RADM McKinley, Andrew CAPT Anonymous CDR Tirpak, Garrett

Appendix B

VFM MEMBERSHIP DEMOGRAPHICS AND ACCOMPLISHMENTS

GENERAL

Total VFM Members	627
Army	308
Air Force	160
Navy	97
Marines	57
Coast Guard	5
Officers (Total)	545
General/Flag Officers	119
Warrant Officers	10
W-5s	2
Enlisted	72
E-9s	15
Minorities	31
Females	24
Combat Tours	934
Combat Command or Combat Leadership Positions	476
Career Command/Leadership Positions (combat and non-combat)	1,769
Years Served	14,397
Corporate Leadership Positions	290

AWARDS AND DECORATIONS^{1,2}

CMB (Combat Medic Badge)

CAR (Combat Action Ribbon)

AFCAM (Air Force Combat Action Medal)

Medal of Honor	21
Distinguished Service/Navy/Air Force Cross	9
Silver Star	142
Distinguished Flying Cross ³	220
Bronze Star Medal with Valor ⁴	212
Bronze Star Medal (without valor)	360
Air Medal with Valor ⁵	366
Air Medal (without valor)	2,192
Other Valor Awards	163
Prisoner of War Medal	45
Purple Heart	215
Combat Action Awards	217
(CIB/CAB/CMB/CAR/AFCAM)	
COMBAT ACTION AWARDS	
CIB (Combat Infantryman's Badge)	139
CAB (Combat Action Badge)	11

6

8

53

¹ The highest three military decorations that are awarded solely for "valor" are, in descending order, the Medal of Honor; the Distinguished Service Cross (Army), Navy Cross (Navy, Marine Corps and Coast Guard when operating under Navy authority), and Air Force Cross (Air Force); and the Silver Star. Criteria for each are explained at *Military Awards for Valor-Top 3, Description of Medals*, U.S. Dep't of Def. (last accessed May 7, 2022), https://valor.defense.gov/description-of-awards/.

[&]quot;Valor is an act or acts of heroism by an individual above what is normally expected while engaged in direct combat with an enemy of the United States, or an opposing foreign or armed force, with exposure to enemy hostilities and personal risk." Off. of Under Sec'y of Def. for Pers. & Readiness, Dep't of Def., DoDI

1348.33, DoD Military Decorations and Awards Program 20 (Apr. 9, 2021), https://tinyurl.com/5n95uatk.

² Several other "multi-purpose personal military decorations" sometimes are used to recognize "valor." They include the Distinguished Flying Cross (DFC), Bronze Star Medal (BSM), Air Medal (AM) and various commendation medals. When these are used to recognize "valor" (as defined above), the citation should specify the award to include the "V" device. *Id.* For the DFC, however, this was not always true, with DFCs' having been routinely awarded—without inclusion of the "V" designation—to recognize valorous actions (see n.3, *infra*). A 2016 regulation revision attempted to standardize practices regarding award of the DFC prospectively. *Id.*

The data provided here represent the numbers of valor awards (and BSMs and AMs without "valor"), including "Other Valor Awards," received by VFM members. The Prisoner of War Medal, Purple Heart, and Combat Action Awards are not "valor" awards but are relevant decorations.

³ The DFC is awarded for heroism or extraordinary achievement while participating in aerial flight. The actions must be entirely distinctive, involving operations that are not routine. Fact Sheet Display, Distinguished Flying Cross, A.F. Pers. Ctr. (last accessed May 7, 2022), https://www.afpc.af.mil/Fact-Sheets/Display/Article/421931/distinguished-flying-cross/. The actions involved need not necessarily have been in combat.

All but one VFM member who reported award of the DFC also reported combat deployments. (The one DFC recipient who reported no combat deployments flew with the U.S. Air Force Air Demonstration Squadron—Thunderbirds—which may explain the circumstances of his DFC award.) Review of citations, e.g., MG Brady's six DFC citations, Awards, Patrick Brady, Mil. May Times (last accessed 2022), https://valor.militarytimes.com/hero/2540, shows that most (all in General Brady's case) do not include the "V" device, but they do document heroism and/or extraordinary achievement in aerial flight in combat operations. The majority of the DFCs reported here, therefore, recognize heroism or extraordinary achievement in combat.

- ⁴ The Bronze Star Medal is awarded to those who have distinguished themselves "by heroic or meritorious achievement or service, not involving participation in aerial flight, in connection with military operations against an armed enemy." Fact Sheet Display, Bronze Star Medal, A.F. Pers. Ctr. (last accessed May 7, 2022), https://www.afpc.af.mil/Fact-Sheets/Display/Article/421879/bronze-star-medal/. The recognizes acts of heroism performed in ground combat if they are of lesser degree than that required for the Silver Star. Id. It is thus the fourth highest award for heroism or meritorious achievement for actions on the ground. When awarded for "valor," the citation will indicate inclusion of the "V" device. Off. of Under Sec'y of Def. for Pers. & Readiness, Dep't of Def., DoDI 1348.33, DoD Military Decorations and Awards Program 20 (Apr. 9, 2021), https://tinyurl.com/5n95uatk. "All [BSM] awards for non-valorous achievement or service must satisfy the requirements for personal exposure to hostile action or significant risk of exposure to hostile action." Id. at 14.
- ⁵ The Air Medal is awarded for single acts of heroism or meritorious achievements while participating in aerial flight in actual combat in support of operations. *Fact Sheet Display, Air Medal*, A.F. Pers. Ctr. (last accessed May 7, 2022), https://www.afpc.af.mil/Fact-Sheets/Display/Article/421927/air-medal/. The award recognizes achievement less than that required for the Distinguished Flying Cross, but which is above and beyond what is expected of professional airmen. *Id*. When awarded for "valor," the citation will indicate inclusion of the "V" device. *Id*.

OFFICER COMMISSIONING SOURCES Service Academy Graduates 292 ROTC 100 OCS 66 OTS 25 PLC 15 Other 47 SERVICE ACADEMY GRADUATES **USMA** 167 USNA 49 USAFA 73 USCGA 2USMMA 1 **COMBAT TOURS** Korea 10 Vietnam 535 Gulf War 91 Iraq 105 Afghanistan 72 Other 121 **MINORITIES** Asian 3 9 Black Hispanic 10 Native American 2 3 Pacific Islander Other 4

PAYGRADE

O-10	12
O-9	25
O-8	5 3
O-7	29
0-6	161
O-5	124
O-4	45
O-3	87
O-2	8
O-1	1
W-5	2
W-4	7
W-3	0
W-2	1
W-1	0
E-9	15
E-8	12
E-7	8
E-6	8
E-5	14
E-4	14
E-3	1
E-2	0
E-1	0

This page intentionally left blank.

 ${\it Appendix~C}$ PAYGRADES AND CORRESPONDING RANKS

Pay-	Army	Air Force	U.S. Marine	Navy/Coast
grade			Corps	Guard
O-10	GEN	Gen	Gen	ADM
	General	General	General	Admiral
O-9	LTG	Lt Gen	LtGen	VADM
	Lieutenant	Lieutenant	Lieutenant	Vice Admiral
	General	General	General	
O-8	MG	Maj Gen	MajGen	RADM
	Major General	Major General	Major General	Rear Admiral Upper Half
O-7	BG	Brig Gen	BGen	RDML
	Brigadier General	Brigadier	Brigadier	Rear Admiral
		General	General	Lower Half
O-6	COL	Col	Col	CAPT
	Colonel	Colonel	Colonel	Captain

22a

Pay-	Army	Air Force	U.S. Marine	Navy/Coast
grade			\mathbf{Corps}	Guard
O-5	LTC	Lt Col	\mathbf{LtCol}	CDR
	Lieutenant Colonel	Lieutenant Colonel	Lieutenant Colonel	Commander
0-4	MAJ	Maj	Maj	LCDR
	Major	Major	Major	Lieutenant Commander
O-3	CPT	Capt	Capt	LT
	Captain	Captain	Captain	Lieutenant
O-2	1LT	1st Lt	1stLt	LTJG
	First Lieutenant	First Lieutenant	First Lieutenant	Lieutenant, Junior Grade
O-1	2LT	2d Lt	2ndLt	ENS
	Second Lieutenant	Second Lieutenant	Second Lieutenant	Ensign

Pay- grade	Army	Air Force	U.S. Marine Corps	Navy/Coast Guard
W-5	CW5		CWO5	CWO5
	Chief Warrant Officer 5		Chief Warrant Officer 5	Chief Warrant Officer 5
W-4	CW4		CWO4	CWO4
	Chief Warrant Officer 4		Chief Warrant Officer 4	Chief Warrant Officer 4
W-3	CW3		CWO3	CWO3
	Chief Warrant Officer 3		Chief Warrant Officer 3	Chief Warrant Officer 3
W-2	CW2		CWO2	CWO2
	Chief Warrant Officer 2		Chief Warrant Officer 2	Chief Warrant Officer 2
W-1	WO1		wo	WO1
	Warrant Officer		Warrant Officer	Warrant Officer

24a

Pay- grade	Army	Air Force	U.S. Marine Corps	Navy/Coast Guard
E-9	SGM/CSM/SMA	CMSgt/CMSAF	MGySgt/ SgtMaj	MCPO/MCPON/ MCPOCG
	Sergeant Major Command	Chief Master Sergeant	Master Gunnery Sergeant	Master Chief Petty Officer
	Sergeant Major of Sergeant Major of the Army	Chief Master Sergeant of the Air Force	Sergeant Major	Master Chief Petty Officer of the Navy
				Master Chief Petty Officer of the Coast Guard
E-8	MSG/1SG	SMSgt	MSgt	SCPO
	Master Sergeant	Senior Master Sergeant	Master Sergeant	Senior Chief Petty Officer
	First Sergeant			

25a

Pay- grade	Army	Air Force	U.S. Marine Corps	Navy/Coast Guard
E-7	\mathbf{SFC}	MSgt	\mathbf{GySgt}	СРО
	Sergeant First Class	Master Sergeant	Gunnery Sergeant	Chief Petty Officer
E-6	SSG	TSgt	\mathbf{SSgt}	PO1
	Staff Sergeant	Technical Sergeant	Staff Sergeant	Petty Officer 1st Class
E-5	\mathbf{SGT}	SSgt	\mathbf{Sgt}	PO2
	Sergeant	Staff Sergeant	Sergeant	Petty Officer 2nd Class
E-4	SPC/CPL	SrA	Cpl	PO3
	Specialist Corporal	Senior Airman or Sergeant	Corporal	Petty Officer 3rd Class

26a

Pay- grade	Army	Air Force	U.S. Marine Corps	Navy/Coast Guard
E-3	\mathbf{PFC}	A1C	LCpl	$\mathbf{S}\mathbf{N}$
	Private First Class	Airman First Class	Lance Corporal	Seaman
E-2	PV2	Amn	PFC	SA
	Private 2	Airman	Private First Class	Seaman Apprentice
E-1	PVT	AB	Pvt	SR
	Private	Airman Basic	Private	Seaman Recruit

Appendix D

VFM MEMBERSHIP SPECIAL RECOGNITIONS AND SENIOR LEADERSHIP SUMMARY

SPECIAL RECOGNITION	
Medal of Honor Recipients	21
Distinguished Service/Navy/Air Force Cross Recipients	9
Total Combat Valor Awards Received	> 900
Prisoners of War	45
Service Academy Distinguished Graduate Award (post career) Recipients	8
U.S. Military Academy	4
U.S. Naval Academy	1
U.S. Air Force Academy	3
SENIOR LEADERSHIP SUMMARY	
Four-star Generals/Admirals	12
Service Chiefs of Staff (Air Force)	2
Vice Chiefs of Staff/Vice Chief of Naval Operations (Army, Navy)	2
Four-star Commands Held	15
CINC, USFK-UNC Korea	
CINC, USAREUR/7th Army	
CINC, U.S. Naval Forces Europe/ NATO CINC Allied Forces Southern Europe	

SENIOR LEADERSHIP SUMMARY (CONT'D)	
Four-star Commands Held (cont'd)	
Cdr, NATO IFOR, Bosnia	
CG, Air Combat Command	
CG, Air Force Logistics Command	
CG, Air Force Space Command	
CG, NORAD & U.S. Space Command	
CINC, U.S. Transportation Command	
CG, Air Mobility Command	
CINC, U.S. Air Forces Europe, Cdr, Allied Air Forces Central Europe	
CG, U.S. Joint Forces Cmd & NATO Supreme Allied Cdr for Transformation	
Anonymous (3)	
Three-star Generals/Admirals	25
Significant Three-star Staff Positions Held	8
Dep'y Chief of Staff, Personnel (Army, Air Force) (2)	
Dep'y Chief of Staff, Programs and Resources (AF)	
Dep'y Chief of Staff, Plans & Operations (AF)	
Dep'y Chief of Naval Operations, Plans Policy & Operations (Navy)	
Dep'y Commandant for Aviation, HQ USMC	
Inspector General, HQ Dep't of the Army	

Anonymous

SENIOR LEADERSHIP SUMMARY (CONT'D)	
Three-star Commands Held	24
CG, I Corps	
CG, III Corps (2)	
CG, V Corps	
CG, VII Corps	
CG, U.S. Army Pacific	
CG, U.S. Army Special Operations Command	
CG, U.S. Army Space & Missile Defense Command	
Cdr, Second Fleet & NATO Striking Fleet	
Cdr, Submarine Force Atlantic Fleet/Cdr, Submarine Allied Command Atlantic	
Cdr, Naval Surface Force Pacific Fleet	
CG, 3rd Air Force	
CG, 7th Air Force (2)	
CG, Air Component Command, RoK/ U.S. Combined Forces Command, RoK	
CG, Air Education and Training Command	
CG, USAF Air University (2)	
III Marine Expeditionary Force & MCB Japan	ı
CG, U.S. Marine Forces Pacific/ U.S. Marine Forces Central Command/ Fleet Marine Force, Pacific, U.S. Marine Corps Bases, Pacific	
Cdr, Atlantic Area & U.S. Maritime Defense Zone Atlantic	
Anonymous (3)	

SENIOR LEADERSHIP SUMMARY (CONT'D)	
Other Notable Commands	40
CG, 82nd Airborne Div. (2)	
CG, 6th Infantry Div.	
CG, 24th Infantry Div.	
CG, 25th Infantry Div.	
CG, 2nd Armd Div.	
CG, Military District Washington	
CG, U.S. Army Recruiting Command	
CG, Joint Forces HQ National Capital Region & MDW	
CO, U.S. Army 75th Ranger Regiment (2)	
Cdr, Carrier Battle Group Six (2)	
Cdr, Carrier Group Three	
Cdr, Carrier Group Four & NATO Carrier Striking Fleet	
Cdr, Carrier Group Eight	
Cdr, Submarine Group Five (West Coast Pacific Fleet)	
Cdr, Cruiser Destroyer Group 8	
CG, MCAS Cherry Point	
CG, Third Marine Aircraft Wing	
CG, Marine Air Ground Combat Center	
CG, 1st Marine Expeditionary Brigade	
CG, 4th Marine Division	
CG. Marine Forces Reserve	

31a

SENIOR LEADERSHIP SUMMARY (CONT'D)

Other Notab	ole Commands	(cont'd)
-------------	--------------	----------

- CG, Second Marine Air Wing
- CG, III Marine Expeditionary Brigade
- CG, 4th Marine Aircraft Wing
- CG, Marine Corps Reserve Support Command

18

- CG, AF Doctrine Center (3)
- CG, AF Personnel Center
- Cdr, Seventh Coast Guard District
- Cdr, USCG Reserve
- Cdr, U.S. Navy Blue Angels
- Anonymous (5)

Ships Commanded

- USS Coral Sea (CV-43)
- Midway-class carrier (2)
- USS America (CV-66)
 - Kitty Hawk-class supercarrier
- USS Dwight D. Eisenhower (CV-69)
- Nimitz-class carrier
- USS Abe Lincoln (CG-3) (CVN-72)
- Nimitz-class carrier
- USS Saratoga (CVA-60)
- Forrestal-class supercarrier
- USS Ohio (SSBN-726) Ohio-class
- nuclear powered ballistic missile submarine

SENIOR LEADERSHIP SUMMARY (CONT'D)

Ships Commanded (cont'd)

USS Groton (SSN-694)

Los Angeles-class submarine

USS Luce (DDG-38)

Farragut-class guided missile destroyer

USS Richmond K. Turner (DLG-20)

Leahy-class cruiser destroyer

USS San Jose (AFS-7)

Mars-class combat stores ship

USS Canon (PG-90) Asheville-class gunboat

USS Ready (PG-87) Asheville-class gunboat

USS Savannah (AOR-4)

Wichita-class replenishment oiler

USS Kalamazoo (AOR-6)

USS Caloosahatchee (AO-98)

USS Wichita (AOR-1)

USS White Plains (AFS-4)

Mars-class combat stores ship

NORAD, Command Director

Cdr, Medium Attack Tactical Electronic Warfare Wing Pacific

Director, Reserve and Military Personnel, USCG

Director, Officer Personnel Management Systems XXI Task Force (Army)

33a

SENIOR LEADERSHIP SUMMARY (CONT'D)			
	Service Academy Superintendent (USAFA)		
	Service Academy Commandants (USMA, USCGA) (2)		
	Service Academy Deans (USAFA)		
	Senior Service School Commandants	5	
	National War College (2)		
	Air War College (2)		
	Naval War College		
	Other Service School Commandants	3	
	U.S. Army AMEDDC&S (2)		
	U.S. Special Forces WOI School		
	U.S. Army Training Center Commanding Generals	5	
	CG, U.S. Army Armor School		
	CG, U.S. Army Infantry School & Ft. Benning		
	CG, U.S. Army Transportation Center & School		
	CG, U.S. Army JFK Special Warfare Center & School		
	Anonymous		
White House Assignments		3	
Military Assistant to the President			
	Anonymous (2)		

SENIOR LEADERSHIP SUMMARY (CONT'D)

University/College Presidents
University of Alaska
Colorado Technical University

2

OTHER LEADERSHIP

53

Chairman of the Board, USNA Alumni Ass'n

Naval Academy Board of Visitors

Trustee, USNA Foundation Athletic & Scholarship Program

President & CEO, Navy-Marine Corps Relief Society

Chair, Senior Advisory Group to Director, Los Alamos Nat'l Laboratory

General Chair, Submarine Technology Symposium

Trustee & Committee Chair, West Point Ass'n of Graduates

Chair, Technical College of the Low Country Foundation

NSA Advisory Board

Dep'y Ass't SECNAV Reserve Affairs

Chair, SC Commission for Minority Affairs

White House Fellow & Staff (2)

Dir., DOD Coop Threat Reduction

Defense Health Board

Dir., Political Military Affairs Asia Pacific, JCS

OTHER LEADERSHIP (CONT'D)

Civilian Aide SECARMY

IT Director, USDA

Dep'y Ass't SECDEF, Civil Military Policy

Ass't U.S. Attorney

State Dir. Transportation, MO

Spec. Ass't to Dep'y Under Secretary Navy

Dir., USA Vietnam War Commemoration

Manager, Sandia National Labs

Commissioner, U.S. Comm. Int'l Religious Freedom

Dep'y Dir. Spec Ops to Ass't SECDEF for Spec Ops

Dir., Emergency Operations, DoE

Navy Liaison, House of Representatives

Member, Reserve Forces Policy Board

Dir., Ohio State Dep't Veterans Services

Secretary, American Battle Monuments Commission

NORAD PAO

Chief of Base, CIA

DAIG Inspection Team Chief

President, Colorado Board of Health

Dir., White House Military Operations

Chairman, Naval Aviation Museum Foundation

National President, Air Force Association

Ass't Secretary of Commerce, FTC

FEMA Federal Coordinating Officer

36a

OTHER LEADERSHIP (CONT'D)

Squadron Commander, MS Civil Air Patrol

Sr. Defense Reform Advisor

Army Science Board

Dep'y PEO Armored Systems Modernization

Sec'y, CA Dep't Veterans Affairs

N.C. House of Representatives

Pres., Comm'n on the Assignment of Women in the Armed Forces

Commandant, VA Nursing Home

U.S. Deputy & Acting Sec'y Education

Leadership Course Director, USAFA

Anonymous (4)

COMBAT COMMANDS/LEADERSHIP POSITIONS HELD¹

Combatant Command	0
Corps	1
Division	5
Fleet	0
Group	10
Wing	14
Brigade	6
Regiment	3

 $^{^{\}rm 1}$ Partial data for principal command levels, mostly Army and Air Force.

COMBAT COMMANDS/LEADERSHIP POSITIONS HELD (CONT'D) Battalion 38 Squadron 18 62 Company 7 Troop Platoon 35 HIGHEST COMMANDS/LEADERSHIP HELD NON-COMBAT² Combatant Command 4 Corps 5 MAJCOM 17 Numbered Air Force 3 Division 14 Fleet 4 Group 14 23 Wing Brigade 30 Regiment 6 Battalion 46 Squadron 19 Company 52Troop 3 Platoon 16

 $^{^{\}rm 2}$ Partial data for the highest level of command held not in combat.

Appendix E

VFM MEDAL OF HONOR RECIPIENTS AND PRISONERS OF WAR

MEDAL OF HONOR RECIPIENTS

COL Donald E. Ballard, USA

The Recipients, Donald Everett Ballard, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/donald-e-ballard

Col. Barney Barnum, Jr., USMC

The Recipients, Harvey Curtiss "Barney" Barnum Jr., Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/harvey-curtiss-barney-barnum-jr

MG Patrick H. Brady, USA

The Recipients, Patrick Henry Brady, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/patrick-h-brady

COL Bruce P. Crandall, USA

The Recipients, Bruce P Crandall, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/bruce-p-crandall

SFC Sammy Davis, USA

The Recipients, Sammy Lee Davis, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/sammy-l-davis

COL Roger H. Donlon, USA

The Recipients, Roger H.C. Donlon, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/roger-h-donlon

SP4 Michael J. Fitzmaurice, USA

The Recipients, Michael John Fitzmaurice, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/michael-j-fitzmaurice

LTC Harold A. Fritz, USA

The Recipients, Harold Arthur Fritz, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/harold-a-fritz

PO3 Robert R. Ingram, USN

The Recipients, Robert Ronald Ingram, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/robert-r-ingram

Maj. Gen. James E. Livingston, USMC

The Recipients, James Everette Livingston, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/james-e-livingston

COL Walter Joseph Marm, Jr., USA

The Recipients, Walter Joseph Marm Jr., Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/walter-j-marm-jr

SP5 James C. McCloughan, USA

The Recipients, James C McCloughan, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/james-c-mccloughan

Col. Robert J. Modrzejewski, USMC

The Recipients, Robert Joseph Modrzejewski, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/robert-j-modrzejewski

SFC Melvin Morris, USA

The Recipients, Melvin Morris, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/melvin-morris

SGT Robert E. O'Malley, USMC

The Recipients, Robert Emmett O'Malley, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/robert-eomalley

MSG Leroy A. Petry, USA

The Recipients, Leroy Arthur Petry, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/leroy-a-petry

SSG Clinton Romesha, USA

The Recipients, Clinton Lavor Romesha, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/clinton-l-romesha

MAJ James A. Taylor, USA

The Recipients, James Allen Taylor, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/james-a-taylor

LT Michael E. Thornton, USN

The Recipients, Michael Edwin Thornton, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/michael-ethornton

Col. Jay R. Vargas, USMC

The Recipients, Jay R Vargas, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/jay-r-vargas

CWO4 Hershel W. Williams, USMC/USA

The Recipients, Hershel Woodrow "Woody" Williams, Cong. Medal of Honor Soc'y (last accessed May 8, 2022), https://www.cmohs.org/recipients/hershel-woodrow-woody-williams

PRISONERS OF WAR

Col William R. Austin II, USAF

Biographies on Prisoners of War and Missing in Action, Austin William Renwick II, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/a/a043.htm

Lt Col Timothy R. Ayres, USAF

Biographies on Prisoners of War and Missing in Action, Ayres Timothy R., P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/a/a070.htm

Maj Gen John L. Borling, USAF

Biographies on Prisoners of War and Missing in Action, Borling John Lorin, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/b/b093.htm

CPT Isaac Camacho, USA

Biographies on Prisoners of War and Missing in Action, Camacho Issac "Ike", P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/c/c134.htm

CAPT David J. Carey, USN

Biographies on Prisoners of War and Missing in Action, Carey David Jay, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/c/c076.htm

CDR Allan R. Carpenter, USN

Biographies on Prisoners of War and Missing in Action, Carpenter Allan Russell, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/c/c077.htm

Col Robert G. Certain, USAF

Biographies on Prisoners of War and Missing in Action, Certain Robert Glenn, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/c/c165.htm

Capt Carl D. Chambers, USAF

Biographies on Prisoners of War and Missing in Action, Chambers Carl Dennis, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/c/c079.htm

Col Kenneth W. Cordier, USAF

Biographies on Prisoners of War and Missing in Action, Cordier Kenneth William, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/c/c094.htm

Maj Joseph Crecca, USAF

Biographies on Prisoners of War and Missing in Action, Crecca Joseph, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/c/c099.htm

CAPT Edward D. Estes, USN

Biographies on Prisoners of War and Missing in Action, Estes Edward Dale, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/e/e029.htm

Col John Fer, USAF

Biographies on Prisoners of War and Missing in Action, Fer John, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/f/f007.htm

Lt Col William A. Gauntt, USAF

Biographies on Prisoners of War and Missing in Action, Gauntt William Aaron, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/g/g078.htm

Lt Col Jay C. Hess, USAF

Biographies on Prisoners of War and Missing in Action, Hess Jay Criddle, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/h/h047.htm

Maj Robert C. Jones, USAF

Biographies on Prisoners of War and Missing in Action, Jones Robert Campbell, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/j/j016.htm

Col Thomas H. Kirk, Jr., USAF

Biographies on Prisoners of War and Missing in Action, Kirk Thomas H., P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/k/k023.htm

CAPT Rodney A. Knutson, USN

Biographies on Prisoners of War and Missing in Action, Knutson Rodney Allen, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/k/k048.htm

COL F. Harold Kushner, USA

Biographies on Prisoners of War and Missing in Action, Kushner Floyd Harold, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/k/k051.htm

LTC Ronald L. Mastin, USAF

Biographies on Prisoners of War and Missing in Action, Mastin Ronald Lambert, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/m/m022.htm

CAPT Eugene B. McDaniel, USN

Biographies on Prisoners of War and Missing in Action, McDaniel Eugene Baker "Red", P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/m/m101.htm

CAPT William J. Metzger, Jr., USN

Biographies on Prisoners of War and Missing in Action, Metzger William John Jr., P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/m/m113.htm

Col Thomas N. Moe, USAF

Biographies on Prisoners of War and Missing in Action, Moe Thomas Nelson, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/m/m114.htm

CAPT Joseph C. Plumb, Jr., USN

Biographies on Prisoners of War and Missing in Action, Plumb Joseph Charles, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/p/p064.htm

Col Paul K. Robinson, Jr., USN

Biographies on Prisoners of War and Missing in Action, Robinson Paul K., P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/r/r095.htm

CAPT Peter V. Schoeffel, USN

Biographies on Prisoners of War and Missing in Action, Schoeffel Peter Vanruyter, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/s/s090.htm

Lt Col William R. Schwertfeger, USAF

Biographies on Prisoners of War and Missing in Action, Schwertfeger William R., P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/s/s182.htm

CDR William L. Shankel, USN

Biographies on Prisoners of War and Missing in Action, Shankel William Leonard, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/s/s095.htm

MAJ Mark A. Smith, USA

Biographies on Prisoners of War and Missing in Action, Smith Mark Allyn, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/s/s189.htm

LtCol Richard E. Smith, USAF

Biographies on Prisoners of War and Missing in Action, Smith Richard Eugene, Jr., P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/s/s107.htm

CAPT Richard A. Stratton, USN

Biographies on Prisoners of War and Missing in Action, Stratton Richard Allen "Dick", P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/s/s122.htm

Col Leroy W. Stutz, USAF

Biographies on Prisoners of War and Missing in Action, Stutz Leroy William, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/s/s123.htm

LtCol Orson G. Swindle III, USMC

Biographies on Prisoners of War and Missing in Action, Swindle Orson George III, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/s/s126.htm

CDR Gary L. Thornton, USN

Biographies on Prisoners of War and Missing in Action, Thornton Gary Lynn, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/t/t045.htm

Col Richard Vogel, USAF

Biographies on Prisoners of War and Missing in Action, Vogel Richard Dale, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/v/v010.htm

Col Dewey W. Waddell, USAF

Biographies on Prisoners of War and Missing in Action, Waddell Dewey Wayne, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/w/w058.htm

Col Ronald J. Webb, USAF

Biographies on Prisoners of War and Missing in Action, Webb Ronald John, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/w/w064.htm

Capt Kenneth R. Wells, USAF

Biographies on Prisoners of War and Missing in Action, Wells Kenneth Roth, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/w/w099.htm

CDR David R. Wheat, USN

Biographies on Prisoners of War and Missing in Action, Wheat David Robert, P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/w/w067.htm

CAPT Lewis I. Williams, Jr., USN

Biographies on Prisoners of War and Missing in Action, Williams Lewis Irving Jr., P.O.W. Network (last accessed May 8, 2022), https://www.pownetwork.org/bios/w/w070.htm

Anonymous (6)