# THE JUDGE ADVOCATE GENERAL'S LEGAL CENTER & SCHOOL U.S. ARMY



# MILITARY CITATION GUIDE

TWENTY-SIXTH EDITION 2025

COMPILED BY THE EDITORS OF The Army Lawyer and the Military Law Review

# MILITARY CITATION GUIDE

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# **Quick Reference: Military Citation Formats**

Note: Whenever possible, regardless of the source, use pincites to identify the specific sections or pages referenced.

Military Justice Cases (Part II) [Do not cite headnotes or syllabi.]

Court of Appeals for the Armed Forces (5 Oct. 1994–present):

Court of Military Appeals (1975–4 Oct. 1994):

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Army Board of Review (1951-31 Aug. 1969):

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United States v. Arnold, 40 M.J. 744, 746 (A.F.C.M.R. 1994).

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United States v. Flores-Galarza, 40 M.J. 900, 904 n.8 (N.M.C.M.R. 1994).

United States v. Larsen, 50 C.M.R. 534, 535 (N.C.M.R. 1975), rev'd, 1 M.J.

Example of subsequent history: United States v. Phillips, 73 M.J. 572 (A. Ct. Crim. App. 2014), aff'd, 74 M.J. 20

(C.A.A.F. 2015).

Unreported CAAF Case: United States v. Kastenberg, No. 13-5006 (C.A.A.F. July 18, 2014).

Unreported CCA Case: United States v. Guenther, No. 20110516, 2014 WL 3353876, at \*1 (A. Ct. Crim. App. June 28, 2014).

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MANUAL FOR COURTS-MARTIAL, UNITED STATES pt. IV, ¶ 93c (2024) [hereinafter MCM] (followed by parenthetical explanation).

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UCMJ art. 134 (2024).

U.S. DEP'T OF ARMY, REGUL. 27-10, MILITARY JUSTICE (8 Jan. 2025) [hereinafter AR 27-10].

1776 Articles of War, reprinted in WILLIAM WINTHROP, MILITARY LAW AND PRECEDENTS 976 (2d ed. 1920).

Articles of War, 2 Stat. 359 (1806), reprinted in WILLIAM WINTHROP, MILITARY LAW AND PRECEDENTS 976 (2d ed. 1920).

Contract Law—Cases and Administrative Decisions (Part V)

Federal Claims Court (1992-present): Pearl v. United States, 111 Fed. Cl. 301, 304-05 (2013).

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GAO Red Book:

DFARS 201.104 (Jan. 2025). AFARS 5101.301 (July 11, 2025).

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LAW ch. 2, sec. C.1 (4th ed. 2016) [hereinafter GAO RED BOOK].

Office of Management and Budget: OFF. OF MGMT. & BUDGET, EXEC. OFF. OF THE PRESIDENT, OMB CIR. A-11, PREPARATION,

SUBMISSION, AND EXECUTION OF THE BUDGET (Apr. 28, 2021) [hereinafter OMB CIR. A-11].

#### DoD Issuances (Directives, Instructions, Regulations, Manuals, and Directive-Type Memorandums)

- U.S. DEP'T OF DEF., DIR. 5505.06, INVESTIGATIONS OF ALLEGATIONS AGAINST SENIOR DOD OFFICIALS para. 3 (6 June 2013) (C1, 28 Apr. 2020) [hereinafter DODD 5505.06].
- U.S. DEP'T OF DEF., INSTR. 3025.21, DEFENSE SUPPORT OF CIVILIAN LAW ENFORCEMENT AGENCIES encl. 3, para. 1(c) (27 Feb. 2013) (C1, 8 Feb. 2019) [hereinafter DODI 3025.21].
- U.S. DEP'T OF DEF., 5500.7-R, JOINT ETHICS REGULATION (JER) para. 3-100 (15 May 2024) [hereinafter JER].
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#### Joint Publications

JOINT CHIEFS OF STAFF, JOINT PUB. 3-84, LEGAL SUPPORT, at III-6 (2 Aug. 2016) [hereinafter JP 3-84].

JOINT CHIEFS OF STAFF, JOINT PUB. 3-0, JOINT CAMPAIGNS AND OPERATIONS, at VII-1 (18 Jun. 2022) [hereinafter JP 3-0].

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- U.S. DEP'T OF ARMY, TECHS. PUB. 4-71, CONTRACTING SUPPORT BRIGADE para. 2-5 (3 Oct.r 2024) [hereinafter ATP 4-71].

#### Navy Publications (Regulations, Manuals, and Instructions)

- U.S. DEP'T OF NAVY, JAGINST 5800.7G, MANUAL OF THE JUDGE ADVOCATE GENERAL (JAGMAN) sec. 0168 (1 Dec. 2023) [hereinafter JAGMAN].
- U.S. DEP'T OF NAVY, SEC'Y OF NAVY INSTR. 3300.1D, DEPARTMENT OF THE NAVY LAW OF WAR PROGRAM para. 3 (19 May 2022) [hereinafter SECNAVINST 3300.1D].
- U.S. DEP'T OF NAVY, CHIEF, NAVAL OPERATIONS INSTR. 5711.95F, U.S. NAVY PARTICIPATION IN THE INTERNATIONAL STANDARDIZATION PROCESS para. 1 (19 Apr. 2021) [hereinafter OPNAVINST 5711.95F].

### **Marine Corps Publications**

- U.S. MARINE CORPS, NAVMC 3500.103, MARINE CORPS ANTITERRORISM (AT) MANUAL para. 1000 (27 Oct. 2010) [hereinafter NAVMC 3500.103].
- U.S. MARINE CORPS, NAVMC DIR. 1700.23G, REQUEST MAST PROCEDURES ch. 4, para. 2 (21 June 2019) [hereafter NAVMC DIR 1700.23G].
- U.S. Marine Corps, Order 5354.1/G, Marine Corps Prohibited Activities and Conduct (PAC) Prevention and Response Policy ch. 1, para. 3(a) (11 Apr. 2025) [hereinafter MCO 5354.1G].
- U.S. MARINE CORPS, ORDER 5800.16 V16, LEGAL SUPPORT AND ADMINISTRATION MANUAL: MILITARY JUSTICE para. 1001 (19 June 2020) (C2, 14 July 2021) [hereinafter LEGADMINMAN MJ].

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- U.S. DEP'T OF AIR FORCE, MANUAL 51-203, RECORDS OF TRIAL para. 1.4 (21 Apr. 2021) [hereinafter AFMAN 51-203].
- U.S. DEP'T OF AIR FORCE, INSTR. 51-110, PROFESSIONAL RESPONSIBILITY PROGRAM para. 3.7 (11 Dec. 2018) [hereinafter AFI 51-110].
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Headquarters, U.S. Cent. Command, Gen. Order No. 1C (21 May 2013) [hereinafter USCENTCOM GO-1C].

#### **Investigations (Part VI.D.5)**

INSPECTOR GEN., U.S. DEP'T OF DEF., NO. 11-119226-153, REPORT OF INVESTIGATION: GENERAL WILLIAM E. WARD, U.S. ARMY, COMMANDER, U.S. AFRICOM (June 26, 2012) [hereinafter DOD IG ROI-GEN. WARD].

LIEUTENANT GENERAL ANTHONY R. JONES, ARMY REGULATION 15-6 REPORT OF INVESTIGATION OF THE ABU GHRAIB PRISON AND 205TH MILITARY INTELLIGENCE BRIGADE [hereinafter ABU GHRAIB PRISON INVESTIGATION] (on file with author).

<sup>\*</sup> The paragraph numbering system for this regulation requires specification of the volume and the use of following subdivision convention: "ch. 01" for "chapter 01," "sec. 0101" for "section 0101," "para. 010101" for "paragraph 010101," and "subpara. 010101A" for "subparagraph 010101A." U.S. DEP'T OF DEF., 7000.14-R, DOD FINANCIAL MANAGEMENT REGULATION, at I-4 (May 2019).

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C. Todd Lopez, Change to Army Post-9/11 GI Bill Transfer Policy Takes Effect Aug. 1, U.S. ARMY (July 8, 2013), http://www.army.mil/article/101298/New\_Army\_Post\_9\_11\_GI\_Bill\_transfer\_policy\_to\_take\_effect\_Aug\_\_1 [https://perma.cc/6KZ6-GXCB].

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Colonel Lindsey O. Graham & Lieutenant Colonel Paul R. Connolly, *Waterboarding: Issues and Lessons for Judge Advocates*, 69 A.F. L. REV. 65 (2013). Lieutenant Commander Kimberly J. Kelly, *Let's Talk About Ethics*, 61 NAVAL L. REV. 17, 25 (2012).

Nicholas K. Roland, The U.S. Army JAG Corps: A Legacy of Legal Excellence Since 1775, ARMY LAW., no. 2, 2025, at 2, 3.

Captain Allison A. DeVito, An Introduction to the Special Victims' Counsel Program, REPORTER, no. 1, 2013, at 4, 4.

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Major Keirsten Kennedy, Persuasive Writing, at slide 2 (Jan. 22, 2014) (unpublished PowerPoint presentation) (on file with author).

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Memorandum from The Judge Advoc. Gen., U.S. Army, to Judge Advoc. Legal Servs. Pers., subject: Military Justice Redesign—Policy Memorandum 19-01 (18 July 2019) [hereinafter Military Justice Redesign Memo].

# **Preface to the Twenty-Sixth Edition**

The twenty-sixth edition of the *Military Citation Guide* (*MCG*) provides the military legal scholar with a convenient citation guide as a complement to *The Bluebook*.

The Bluebook remains the primary citation reference for scholarly legal writing, while the MCG offers supplementary style conventions and citation formats to address military-specific sources. Where these authorities provide contrary guidance, The Bluebook controls. If neither The Bluebook nor the MCG offers specific guidance for a particular source, follow the most analogous provision from either reference.

Part I of the MCG details unique style conventions for military legal scholarship. Parts II through IX provide citation formats—both full and short form—for many military-specific sources. Part X provides examples of miscellaneous sources and Part XI offers examples of commonly used citations. Military authors should follow the citation format appropriate to their military source, providing the required information for each citation element and using the correct font, spacing, and punctuation. A quick reference guide for military-specific citations immediately precedes this preface.

Please email corrections or suggestions to improve the *MCG* to the editors of the *Military Law Review* and *The Army Lawyer* at usarmy.charlottesville.hqda-tjaglcs.mbx.military-law-review@army.mil. Suggestions may also be mailed to: Editors, Professional Communications Program, The Judge Advocate General's Legal Center and School, 600 Massie Road, Charlottesville, Virginia 22903-17817.

# I. General Conventions

# A. Abbreviations and Acronyms.

## 1. Military Rank.

- **a. Text.** Spell out a military rank the first time it is used and include a parenthetical containing its abbreviation. Abbreviate that rank in any subsequent reference, including at the beginning of a sentence. For example: "Major (MAJ) Red led the way after MAJ White was hit by enemy fire. MAJ Blue was evacuated."
- **b.** Citation. Once defined, abbreviate military ranks in citations, except when introducing the author of a source.
  - c. Standard Rank Abbreviations. Follow the specific Service's guidance.
- **2.** The United States. "United States" must be spelled out in full when used as a proper noun. It may be abbreviated to "U.S." when used as an adjective. For example, "As the United States has a fundamental interest in maintaining the free flow of interstate commerce, U.S. policy must properly safeguard the Nation's ports."

### 3. Acronyms.

- **a.** Usage. Before using an acronym, spell the term out the first time it is used and then place the acronym in parenthesis following the term. You may use the plural form of the acronym by adding the letter "s." You must spell out the acronym in the citation sentence even if it has been spelled out in the main text, or vice versa.
- **b. Department of Defense (DoD).** In accordance with the DoD's *Issuance Style Guide*, <sup>1</sup> use the following DoD acronyms after the complete phrase has been spelled out:

Department of Defense (DoD) Secretary of Defense (SecDef) Office of the Secretary of Defense (OSD) Combatant Command [referring to unit] (CCMD) Combatant Commander (CCDR) Combatant Command [referring to authority]<sup>2</sup> (COCOM) Central Command (USCENTCOM) European Command (USEUCOM) Northern Command (USNORTHCOM) Indo-Pacific Command (USINDOPACOM) Southern Command (USSOUTHCOM) Special Operations Command (USSOCOM) Strategic Command (USSTRATCOM) Transportation Command (USTRANSCOM) Africa Command (USAFRICOM) Cyber Command (USCYBERCOM)

# B. Numerals—Military Unit Designations.

- 1. Armies. Spell out the number identifying an Army, such as "Fifth Army."
- 2. Corps. Use Roman numerals for corps, such as "V Corps" or "XVIII Airborne Corps."
- **3. Divisions or Smaller.** Use Arabic numerals for organizations of division size or smaller, such as "1st Infantry Division" or "32d Army Air and Missile Defense Command." Note: *do not* use a superscript font for ordinals, such as "1st" or "32d." Do not use "nd" in writing the ordinal "2d" or "rd" for the ordinal "3d"—use only "d."

#### C. Dates.

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<sup>&</sup>lt;sup>1</sup> U.S. DEP'T OF DEF., DOD ISSUANCE STYLE GUIDE tbl.3 (July 18, 2025).

<sup>&</sup>lt;sup>2</sup> JOINT CHIEFS OF STAFF, DOD DICTIONARY OF MILITARY AND ASSOCIATED TERMS 38 (Jan. 2021).

- 1. Text. In all sentences—whether in the main text or in a footnote—use the military date format of daymonth-year and do not abbreviate the month. The exception is a date used as a term of art, such as "September 11th" or "9/11."
- **2. Citations.** Use the civilian date format of month-day-year *unless* the source cited uses the military date format. Whether using the military or civilian date format in a citation, always abbreviate the month according to *Bluebook* Table T12 except for Zulu Date-Time-Group format for messages.
- **D.** Capitalization. Capitalize the words "Soldier," "Marine," "Sailor," "Coast Guardsman," "Airman," "Guardian," and "Service member" when referring to members of the U.S. Armed Forces. Capitalize "Family" when referring to a U.S. military family. Capitalize "Civilian" when referring to a U.S. Department of Army civilian if used in conjunction with the word "Soldier" or "Family." Do not capitalize "soldier" when referring to a member of a foreign force. Do not capitalize "noncommissioned officer" or "officer." Capitalize the words "charge" and "specification" when referring to a numbered, or specifically identified, charge or specification, such as "Specification 3 of Charge II." In all other cases, do not capitalize these terms (e.g., "There were several charges and specifications.").

# **II. Military Justice Cases**

- **A. Overview.** Citation formats for military jurisdictions are briefly listed in *The Bluebook*, Table T1.1; however, the quick reference guide in the front of the *MCG* lists more specific date parameters and should be used as the primary resource.
- B. Reported Military Justice Cases.
  - 1. From 1951 to 31 August 1969.
    - a. A service board of review:

```
[Case Name], [vol.] C.M.R. [page] (A.B.R. 19xx). [Case Name], [vol.] C.M.R. [page] (A.F.B.R. 19xx). [Case Name], [vol.] C.M.R. [page] (N.B.R. 19xx). [Case Name], [vol.] C.M.R. [page] (C.G.B.R. 19xx).
```

b. United States Court of Military Appeals:

```
[Case Name], [vol.] C.M.R. [page] (C.M.A. 19xx).
```

- 2. From 1 September 1969 to 1975.4
  - a. A service court of military review:

```
[Case Name], [vol.] C.M.R. [page] (A.C.M.R. 19xx). [Case Name], [vol.] C.M.R. [page] (A.F.C.M.R. 19xx). [Case Name], [vol.] C.M.R. [page] (N.C.M.R. 19xx). [Case Name], [vol.] C.M.R. [page] (C.G.C.M.R. 19xx).
```

b. United States Court of Military Appeals:

[Case Name], [vol.] C.M.R. [page] (C.M.A. 19xx).

<sup>&</sup>lt;sup>3</sup> U.S. DEP'T OF ARMY, PAM. 25-40, ARMY PUBLISHING PROGRAM PROCEDURES para. 3-4 (1 Feb. 2024) (C1, 4 Feb. 2025).

<sup>&</sup>lt;sup>4</sup> The service boards of review were renamed "courts of military review" by the Military Justice Act of 1968. Military Justice Act of 1968, Pub. L. No. 90-632, sec. 2(25), § 66, 80 Stat. 1335, 1341. The effective date for that amendment was 1 September 1969. *Id.* § 4(a).

#### 3. From 1975 to 4 October 1994.

a. A service court of military review:

```
[Case Name], [vol.] M.J. [page] (A.C.M.R. 19xx).

[Case Name], [vol.] M.J. [page] (A.F.C.M.R. 19xx).

[Case Name], [vol.] M.J. [page] (N.M.C.M.R. 19xx) or (N.C.M.R. 19xx) (prior to 1981).

[Case Name], [vol.] M.J. [page] (C.G.C.M.R. 19xx).
```

b. United States Court of Military Appeals:

```
[Case Name], [vol.] M.J. [page] (C.M.A. 19xx).
```

#### 4. From 5 October 1994 to Present.

a. A service court of criminal appeals:

```
[Case Name], [vol.] M.J. [page] (A. Ct. Crim. App. 20xx). [Case Name], [vol.] M.J. [page] (A.F. Ct. Crim. App. 20xx). [Case Name], [vol.] M.J. [page] (N-M. Ct. Crim. App. 20xx). [Case Name], [vol.] M.J. [page] (C.G. Ct. Crim. App. 20xx).
```

b. United States Court of Appeals for the Armed Forces:

```
[Case Name], [vol.] M.J. [page] (C.A.A.F. 20xx).
```

# C. Unreported Military Justice Cases.

1. Electronic Database as Source. When available in a commercial electronic database (e.g., Westlaw, Lexis), cite to the database following the citation format of *Bluebook* Rules 10.8.1 and 18.4. The "No." refers to a case's docket number, which can generally be found immediately following the case's caption.

```
[Case Name], No. [xxx], 20xx WL [xxx], at *x (C.A.A.F. Dec. xx, 20xx). [Case Name], No. [xxx], 20xx WL [xxx], at *x (A. Ct. Crim. App. Dec. xx, 20xx). [Case Name], No. [xxx], 20xx WL [xxx], at *x (A.F. Ct. Crim. App. Dec. xx, 20xx). [Case Name], No. [xxx], 20xx WL [xxx], at *x (N-M. Ct. Crim. App. Dec. xx, 20xx). [Case Name], No. [xxx], 20xx WL [xxx], at *x (C.G. Ct. Crim. App. Dec. xx, 20xx).
```

**2. Slip Opinion as Source.** If unavailable in a commercial electronic database, cite to the slip opinion following the citation format of *Bluebook* Rule 10.8.1(b).

```
To cite the case generally: [Case Name], No. [xxx] ([Court] Dec. xx, 20xx). To cite a particular page: [Case Name], No. [xxx], slip op. at x ([Court] Dec. xx, 20xx).
```

- **3. Other Sources.** If unavailable on a commercial electronic database or in a slip opinion, cite to services, periodicals, or other internet sources using *Bluebook* Rules 19, 16, and 18.2.2, respectively.
- **4. Subsequent History—Use of "***review granted.*" Use the phrase "*review granted*" to describe the subsequent history of any case that will be considered on the merits by the U.S. Court of Appeals for the Armed Forces (C.A.A.F.), regardless of how that case reached the C.A.A.F.
- **D. Records of Trial for Military Justice Cases.** Use the following format to cite a court-martial's record of trial.

[Case Name], No. [xxx], [page] ([GCMCA Taking Action], [City, State], [Date Sentence Adjudged]).

# III. Uniform Code of Military Justice (UCMJ)

**A. Overview.** The UCMJ is codified at §§ 801–946a of Title 10, U.S. Code. Cite directly to the UCMJ when you are using the statutory language.

#### B. Text.

- 1. Initial Reference. "Article 15, Uniform Code of Military Justice (UCMJ)."
- 2. Subsequent References. "Article 15, UCMJ" or "Article 15."

# C. Citation.

1. UCMJ (statutory language).

UCMJ art. [x] ( $[year^5]$ ).

**2.** *Manual for Courts-Martial (MCM)*. Much of the *MCM* is an interpretation of the UCMJ, in particular, Part IV. When referring to that interpretation (i.e., language other than the text of a UCMJ article), cite to the *MCM*, not the UCMJ.

MANUAL FOR COURTS-MARTIAL, UNITED STATES pt. IV, ¶ 94c (2019) [hereinafter MCM].

3. Electronic Database as Source.

UCMJ art. [x] ([Electronic Database Name] [year]).

# IV. Manual for Courts-Martial (MCM)

**A. Overview.** The *MCM* includes, among other provisions, the Rules for Courts-Martial, the Military Rules of Evidence, and the punitive articles. Unless otherwise noted, the below rules apply for the version of the *MCM* currently in effect.

## B. Text.

- 1. "Manual for Courts-Martial (MCM)" the first time used; "MCM" thereafter.
- 2. "Rules for Courts-Martial (RCM)" the first time used; "RCM" thereafter (note: no periods in text).
- 3. "Military Rules of Evidence (MRE)" the first time used; "MRE" thereafter (note: no periods in text).

#### C. General Provisions.

1. Full citation. MANUAL FOR COURTS-MARTIAL, UNITED STATES pt. [x], ¶ [x] ([year]) [hereinafter MCM].

<sup>&</sup>lt;sup>5</sup> Cite the year that the statute was enacted or amended, not the year that the *Manual for Courts-Martial* was published. For example, as of 31 July 2025, the proper citation for Article 86, UCMJ, is "UCMJ art. 86 (1950)," while the proper citation of the now-current version of Article 120, UCMJ, is "UCMJ art. 120 (2017)." Here, the citation to Article 86, UCMJ, includes that article's original year of enactment, as it has remained unchanged, whereas the citation to Article 120, UCMJ, includes the year in which it was last amended.

#### 2. Short form citations.

MCM, 
$$supra$$
 note [x], pt. [x],  $\P$  [x].  $Id$ . pt. [x],  $\P$  [x].

#### D. Rules for Courts-Martial.

- 1. Full citation. MANUAL FOR COURTS-MARTIAL, UNITED STATES, R.C.M. [xxx] ([year]) [hereinafter MCM].
  - 2. Short form citations.

```
MCM, supra note [x], R.C.M. [xxx]. Id. R.C.M. [xxx].
```

# E. Military Rules of Evidence.

- 1. Full citation. MANUAL FOR COURTS-MARTIAL, UNITED STATES, M.R.E. [xxx] ([year]) [hereinafter MCM].
  - 2. Short form citations.

```
MCM, supra note [x], M.R.E. [xxx]. Id. M.R.E. [xxx].
```

## F. Changes to the MCM.

1. Change. When citing to a *MCM* provision that has been amended but that has not yet been incorporated into the latest version of the *MCM*, cite the Executive Order in which the change was promulgated.

Exec. Order No. xxxxx, [vol.] Fed. Reg. [page], [pinpoint page] ([date]) (amending [MCM provision).

**2. Supplement to the** *MCM***.** For example, in 2014, the Armed Forces published a supplement to the *MCM* that contained the 2013 Military Rules of Evidence. When citing to the 2013 rules, authors should have cited to the supplement, but only until the rules were incorporated into the next version of the *MCM*.

MANUAL FOR COURTS-MARTIAL, UNITED STATES, M.R.E. [xxx] (Supp. 2014).

# G. Earlier editions of the MCM.

- 1. Full citation. MANUAL FOR COURTS-MARTIAL, UNITED STATES pt. [x],  $\P$  [x] ([year]) [hereinafter [year] MCM].
  - **2. Short form citation.** [year] MCM, *supra* note [x], pt. [x], [x].

# V. Contract Law Administrative Decisions

- **A. Overview.** *The Bluebook*'s guidance on administrative law is somewhat limited (e.g., *Bluebook* Rule 14 and Table T1.2). In addition to the conventions in *The Bluebook* and below, authors may consult the American Bar Association's *Public Contract Law Journal* for citation guidance. Regardless of the structure of citation, the *MCG* applies the rules for case-name abbreviations that are found in *Bluebook* Rule 10 and Tables T6 and T10.
- **B. Board of Contract Appeals Decisions.** These decisions are published in the Commerce Clearing House's *Board of Contract Appeals Decisions (BCA)*.

- 1. Published in BCA.
  - a. Full citation.

```
[Appellant's Name], ASBCA No. [xxxxx<sup>6</sup>], [vol.] BCA ¶ [xxxxx]. [Case caption], CBCA [xxxxx], [vol.] BCA ¶ [xxxxx].
```

- b. Short form citation. [Appellant's Name<sup>7</sup>], [vol.] BCA ¶ [xxxxx], at [page].
- 2. Unpublished but Available in the Westlaw Electronic Database.
  - a. Full citation. [Appellant's Name], No. [xxxxx], 20xx WL [xxxx] (Dec. xx, 20xx).
  - b. Short form citation. [Appellant's Name], 20xx WL [xxx], at \*[page<sup>8</sup>]–[page], \*[page].

# C. Comptroller General Decisions.

- 1. Published *only* in *Comptroller General Procurement Decisions (CPD)*. The page number for citations to a U.S. Government Accountability Office (GAO) decision in the *CPD* will be the same as the PDF version of the Comptroller General decision on the GAO website.
  - a. Full citation. [Decision Name<sup>9</sup>], B-[xxx,xxx], [vol.] CPD ¶ [xx] (Comp. Gen. Dec. xx, 20xx).
  - b. Short form citation. [Decision Name<sup>10</sup>], [vol.] CPD  $\P$  [xx], at [page].
  - 2. Published only in the Comptroller General Reports.
    - a. **Full citation.** [Decision Name], [vol.] Comp. Gen. [page] (20xx).
    - b. **Short form citation.** [Decision Name], [vol.] Comp Gen. [page].
  - 3. Published in both CPD and Comptroller General Reports.
    - a. Full citation. [Decision Name], [vol.] Comp. Gen. [page], [vol.] CPD ¶ [xx] (20xx).
    - b. Short form citation. [Decision Name], [vol.] Comp. Gen. at [page], [vol.] CPD ¶ [xx], at [page].

# VI. Administrative Materials

# A. Regulations, Directives, Instructions, and Orders.

1. Overview. Regulations, directives, instructions, and orders are cited as nonperiodic materials produced by institutional authors. While citation formats for administrative materials are generally found in *Bluebook* Rule 14, Rule 14.2(d) provides that rules and regulations by institutional authors are cited according to Rule 15.1(c). For

<sup>&</sup>lt;sup>6</sup> The ASBCA docket number; note that no comma is used even though there are more than four figures.

<sup>&</sup>lt;sup>7</sup> Or an unambiguous reference to the appellant.

<sup>&</sup>lt;sup>8</sup> When citing to specific page numbers within Westlaw, an asterisk precedes the first page number in a span.

<sup>&</sup>lt;sup>9</sup> Assigned by the U.S. Government Accountability Office.

<sup>&</sup>lt;sup>10</sup> Or an unambiguous reference to the decision name.

that reason, citations to these sources use the "small caps" effect (e.g., "U.S. DEP'T OF ARMY") for the citation's institution author, serial identifier, title, and any regulation abbreviation in a hereinafter clause, if needed.

# 2. Regulations.

#### a. Full citation.

[INSTITUTIONAL AUTHOR<sup>12</sup>], REGUL. [xx], [REGULATION TITLE<sup>13</sup>] para. <sup>14</sup> [x] ([date]) [hereinafter [REGULATION ABBREVIATION] <sup>15</sup> [xx]].

# b. Short form citation.

[REGULATION ABBREVIATION] [xx], supra note [ $x^{16}$ ], para. [x]. 17

c. **Text.** In text, when referring to a specific Army regulation, refer to "Army Regulation (AR)" the first time used; "AR" thereafter. Italicize the title of regulations (e.g., Army Regulation 27-10, *Military Justice*).

#### 3. Directives.

## a. Full citation.

[INSTITUTIONAL AUTHOR], DIR. [xx], [DIRECTIVE TITLE] [page] ([date]) [hereinafter [DIRECTIVE ABBREVIATION<sup>18</sup>] [xx]].

# b. Short form citation.

[DIRECTIVE ABBREVIATION] [xx], *supra* note [x], at [page].

#### 4. Instructions.

## a. Full citation.

[INSTITUTIONAL AUTHOR], INSTR. [xx], [INSTRUCTION TITLE] [page] ([date]) [hereinafter [INSTRUCTION ABBREVIATION<sup>19</sup>] [xx]].

# b. Short form citation.

<sup>&</sup>lt;sup>11</sup> The small caps effect in Microsoft Word is found using the "Home" tab, clicking the small arrow to the right of "Font," then checking the box to the left of "Small caps" in the "Effects" section. The keyboard shortcut is Control + Shift + K.

 $<sup>^{12}</sup>$  Examples include "U.S. Dep't of Army," "U.S. Dep't of Air Force," etc.

<sup>&</sup>lt;sup>13</sup> Include "UPDATE" in the title, if applicable.

<sup>&</sup>lt;sup>14</sup> Use "para. [x]" or "sec. [x]," if applicable. Unless required by *Bluebook* Rule 3, there is no comma between the title and the page, paragraph, part, or section reference.

<sup>&</sup>lt;sup>15</sup> Examples include "AR" (Army Regulation), "AFR" (Air Force Regulation), "AE REGUL." (Army in Europe Regulation), "USFK REGUL." (United States Forces Korea Regulation), "TRADOC REGUL." (Training and Doctrine Command Regulation), etc.

<sup>&</sup>lt;sup>16</sup> Always refers to the first (and only) footnote in which the source is cited in full.

<sup>&</sup>lt;sup>17</sup> Use the word "at" only to refer to a page number in a short citation. Do not use "at" when citing to a paragraph, section, or other subdivision. *See* THE BLUEBOOK: A UNIFORM SYSTEM OF CITATION R. 3.3, at 80 (Columbia L. Rev. Ass'n et al. eds., 22d ed. 2025).

<sup>&</sup>lt;sup>18</sup> Examples include "AD" (Army Directive), "AFPD" (Air Force Policy Directive), "DoDD" (Department of Defense Directive), etc.

<sup>&</sup>lt;sup>19</sup> Examples include "AFI," "JCSI," "SECNAVINSTR," "OPNAVINSTR," etc.

[INSTRUCTION ABBREVIATION] [xx], supra note [x], at [page].

# 5. Marine Corps Orders.

a. Full citation.

U.S. MARINE CORPS, ORDER [xx], [ORDER TITLE] [page] ([date]) [hereinafter MCO [xx]].

b. Short form citation.

MCO [xx], supra note [x], para. [x].

**6.** Changes, Interim Changes, Rapid Action Revisions, and Supplements. If the citation is to a source that contains a change (C), interim change (IC), or a rapid action revision (RAR), indicate that information parenthetically after the initial date of the source (e.g., "(15 June 1998) (C1, 21 Aug. 2001)"). Cite to a supplement in accordance with *Bluebook* Rule 3.1(c) if the supplement is paginated (or "sectioned" or "paragraphed") separately from the primary work.

# B. General Orders and Court-Martial Orders.

- 1. Full citation. [Issuing Authority], Gen. Order No. [xx] ([date]) [hereinafter Gen. Order No. [xx]].
- **2. Short form citation.** Gen. Order No. [xx], *supra* note [x], para. [x].

# C. Forms.

- 1. Full citation. [Issuing Authority], Form<sup>21</sup> [xx], [Form Title] ([date<sup>22</sup>]) [hereinafter Form [xx]].
- **2. Short form citation.** Form [xx], *supra* note [x], at [x].
- D. Memorandums, Policy Letters, Messages, Operations Orders, and Investigations.
  - 1. Memorandums.
    - a. Full citation.

Memorandum<sup>23</sup> from [Issuing Authority<sup>24</sup>] to [Recipient] [et al.], subject: [Memorandum Subject Line] ([date]) [hereinafter [Subject<sup>25</sup>] Memo].

Memorandum of [Understanding/Agreement] between [Parties], subject: [Memorandum Subject Line] ([date]) [hereinafter [Subject] Memo].<sup>26</sup>

b. Short form citation.

<sup>&</sup>lt;sup>20</sup> Use "Gen. Court-Martial Order," "Special Court-Martial Order," or "Summary Court-Martial Order" as applicable.

<sup>&</sup>lt;sup>21</sup> Use "DD Form," "DA Form," "AF Form," "OPNAV Form," "NAVMC Form," "OF," or "SF" as applicable.

<sup>&</sup>lt;sup>22</sup> If citing a blank version of the form, provide the form's publication date, if listed. If citing a completed version of the form, provide the date that the form was completed.

<sup>&</sup>lt;sup>23</sup> Use "Command Policy Memorandum," if applicable.

<sup>&</sup>lt;sup>24</sup> Issuing authorities and recipients should be abbreviated according to *Bluebook* Tables T6 and T10.

<sup>&</sup>lt;sup>25</sup> An unambiguous reference to the subject or issuing authority may also be used.

<sup>&</sup>lt;sup>26</sup> An example of a proper citation follows: Memorandum of Agreement between The Office of The Judge Advocate General and The U.S. Army Criminal Investigation Command, subject: Legal Coordination for CID Law Enforcement Reports (22 Mar. 2021) [hereinafter Legal Coordination for CID Law Enforcement Reports Memo].

[Subject] Memo, *supra* note [x], para. [x].

# 2. Policy Letters and Memorandums.

#### a. Full citation.

Pol'y Letter<sup>27</sup> [xx], [Issuing Authority], subject: [Policy Letter Subject Line] ([date]) [hereinafter [Issuing Authority Acronym] Pol'y Letter [xx]].

#### b. Short form citation.

[Issuing Authority Acronym] Pol'y Letter [xx], *supra* note [x], para. [x]. [Issuing Authority Acronym] Pol'y Letter [xx], *supra* note [x], at [page].

# 3. Messages.

# a. Full citation.

[Activity Identification] Message, [serial number], [Zulu DTG,<sup>28</sup> if any], [Issuing Authority], subject: [Message Subject Line] ([day, month, and year, if no Zulu DTG given]) [hereinafter [All Activities Acronym<sup>29</sup> or Issuing Authority Acronym] Message [serial number]].

#### b. Short form citation.

[Issuing Authority Acronym] Message [serial number, if any], *supra* note [x], para. [x].

## 4. Operations Orders.

#### a. Full citation.

[*Title of Section*], *in* [ISSUING AUTHORITY, TITLE OF OPERATIONS ORDER, ANNEX XX, TITLE OF ANNEX] [paragraph, if any] (date of order).

#### b. Short form citation.

[*Title of Section*], *supra* note [x], para. [x].

# 5. Investigations.

#### a. Full citation.

[INVESTIGATING OFFICER/ORGANIZATION], [SERIAL NUMBER, if any], [INVESTIGATION TITLE] (date) [hereinafter [INVESTIGATING OFFICER] AR 15-6 INVESTIGATION] (on file with author<sup>30</sup>).

#### b. Short form citation.

[INVESTIGATING OFFICER] AR 15-6 INVESTIGATION, *supra* note [x], at [page].

<sup>&</sup>lt;sup>27</sup> Use "Memorandum" if so designated by the issuing authority.

<sup>&</sup>lt;sup>28</sup> Format: [date-time[Z]] [month] [year], as in "250600Z Dec 01."

<sup>&</sup>lt;sup>29</sup> "All Activities" examples include "ALARACT" (All Army), "MILPER" (Military Personnel); "ALNAV" (All Navy), "NAVADMIN" (Navy Administrative), and "ALMAR" (All Marines).

<sup>&</sup>lt;sup>30</sup> Include if the report of investigation is not available to the public.

# VII. Opinions of The Judge Advocates General

**A. Overview.** The Opinions of The Judge Advocate General (Op. JAG) should be cited by title, type of opinion, office symbol (if available), and year. If the opinion is compiled in a digest, these details should be cited after the opinion date. Army opinions were previously digested in the *Judge Advocate Legal Service*. After 1977, they were digested in *The Army Lawyer*. The Air Force reprinted its opinions in the *JAGAF Index-Digest* and the *Air Force JAG Bulletin*, and cited them in *Air Force JAG Reporter* until 1977. Since then, Air Force Op. JAG opinions are found in *The Reporter*.

#### **B.** Full Citation.

[Title of Opinion], Op. JAG, [Service], [Office Symbol, if available]/No. [xx], para. [x] ([date]) [hereinafter Op. JAG, [Service], No. [xx]]. 35

#### C. Short Form Citation.

Op. JAG, [Service], No. [xx], supra note [x], para. [x].

# VIII. Military Publications—Nonperiodic

**A. Overview.** Like military administrative materials, discussed in Part VI, nonperiodic military publications generally follow the citation conventions of *Bluebook* Rule 15.1(c). For that reason, the "large and small capitals" typeface (as in "U.S. MARINE CORPS") is used in citations to these sources. Examples of nonperiodic military publications include manuals, pamphlets, joint publications, service school publications, handbooks, and published reports.

## **B.** Standard Citation Format.

[INSTITUTIONAL AUTHOR<sup>36</sup>], [NONPERIODIC PUBLICATION TYPE<sup>37</sup>] [xx], [TITLE OF PUBLICATION] para. [x] ([date]).

# C. Specific Nonperiodic Publications.

- 1. DA Pamphlets.
  - a. Full citation.

U.S. DEP'T OF ARMY, PAM. [xx], [TITLE OF PAMPHLET] para. [x] ([date]) [hereinafter DA PAM. [xx]].

b. Short form citation.

DA PAM. [xx], *supra* note [x], para. [x].

<sup>&</sup>lt;sup>31</sup> Discharge, Op. OTJAG, Army (10 Feb. 1910), as digested in Dig. Ops. JAG 1912, para. XIII.D.3, at 449.

<sup>&</sup>lt;sup>32</sup> Following the date of the opinion: "(date), reprinted in AIR FORCE JAG BULL., [date], at xx."

<sup>&</sup>lt;sup>33</sup> Following the date of the opinion: "(date), as cited in AIR FORCE JAG REP., [date], at xx."

<sup>&</sup>lt;sup>34</sup> Following the date of the opinion: "(date), reprinted in THE REPORTER, [date], at xx."

<sup>&</sup>lt;sup>35</sup> An example of a proper citation follows: Individual Mobilization Augmentee (IMA) Transportation Entitlements, Op. JAG, Air Force, No. 1996/57 (12 Apr. 1996) [hereinafter Op. JAG, Air Force, No. 1996/57].

<sup>&</sup>lt;sup>36</sup> Abbreviate according to *Bluebook* Tables T6 and T10.

<sup>&</sup>lt;sup>37</sup> Examples include "MANUAL," "FIELD MANUAL," "NAVAL PERS. MANUAL," "PAM.," and "JOINT PUB."

#### 2. Field Manuals.

a. Full citation.

U.S. DEP'T OF ARMY, FIELD MANUAL [xx], [TITLE OF FIELD MANUAL] para. [x] ([date]) [hereinafter FM [xx]].

b. Short form citation.

FM [xx], supra note [x], para. [x].

- 3. Joint Publications.
  - a. Full citation.

JOINT CHIEFS OF STAFF, JOINT PUB. [xx], [PUBLICATION TITLE] [page] ([date]) [hereinafter JP [xx]].

b. Short form citation.

JP [xx], supra note [x], at [page].

- 4. TJAGLCS Publications.
  - a. Full citation.

[Institutional Subdivision<sup>38</sup>], The Judge Advoc. Gen.'s Legal Ctr. & Sch., U.S. Army, [Publication Title] ([date]) [hereinafter [year] [Publication Title]].

b. Short form citation.

[Year] [PUBLICATION TITLE], *supra* note [x], at [page].

- 5. SOPs and Commander's Guides.
  - a. Full citation.

[COMMAND], STANDARD OPERATING PROCEDURES [TITLE] (date) [hereinafter xxx SOP].<sup>39</sup>

b. Short form citation.

[xxx SOP], supra note [x], at [page]. 40

# IX. Military Publications—Periodical

**A. Overview.** Periodicals published by the military follow the citation conventions found in *Bluebook* Rule 16, *Periodical Materials*, with one exception. The author's unabbreviated military grade precedes the author's name in the citation to an article published in *The Army Lawyer*, the *Military Law Review*, the *Naval Law Review*, the

<sup>&</sup>lt;sup>38</sup> Examples include "ADMIN. & CIV. L. DEP'T," "CONT. & FISCAL L. DEP'T," "CRIM. L. DEP'T," "NAT'L SEC. L. DEP'T," and "CTR. FOR L. & MIL. OPERATIONS."

<sup>&</sup>lt;sup>39</sup> An example of a proper citation follows: COMBINED JOINT TASK FORCE-7, STANDARD OPERATING PROCEDURES FOR FOREIGN CLAIMS IN IRAQ 3 (2003) [hereinafter FOREIGN CLAIMS IN IRAQ SOP].

<sup>&</sup>lt;sup>40</sup> An example of a proper citation follows: FOREIGN CLAIMS IN IRAQ SOP, *supra* note [x], at 5.

Air Force Law Review, or the Military Review. Because of their pagination conventions, citations to the Military Law Review follow Bluebook Rule 16.4, and citations to The Army Lawyer follow Bluebook Rule 16.5.

# B. Full Citation for Consecutively Paginated Law Reviews.

[Author's Name Including Unabbreviated Rank], [Article Title], [vol.] [ABBREVIATED JOURNAL NAME<sup>41</sup>] [starting page], [pincite] (20xx).

# C. Full Citation for Nonconsecutively Paginated Journals and Magazines.

[Author's Name Including Unabbreviated Rank], [Article Title], [ABBREVIATED JOURNAL NAME<sup>42</sup>], [[Dec. 20xx] or [no. [x], 20xx]<sup>43</sup>], at [page], [pincite<sup>44</sup>].

# D. Short Form Citation for All Periodicals.

[Author's Last Name], *supra* note [x], at [pincite].

# X. Miscellaneous Sources—Examples

**A. Professional Experience.** When the source or authority that supports an assertion, statement of fact, or position is based upon the author's own observation or experience, cite to that professional experience. This cite, however, should be used sparingly as it lends little credibility to the author's work.

This assertion is based on the author's recent professional experiences as the Chief, International & Operational Law for U.S. Army Special Forces Command (Airborne) from 9 June 2023 to 8 June 2025 [hereinafter Professional Experiences].

# **B.** PowerPoint Presentations.

[Author], [Title of the PowerPoint presentation on slide 1], at slide [x] ([date]) (unpublished PowerPoint presentation) (on file with author).

# **XI.** Commonly Used Citations

#### A. Manual for Courts-Martial.

MANUAL FOR COURTS-MARTIAL, UNITED STATES pt. [x],  $\P$  [x] (2024) [hereinafter MCM]. MCM, *supra* note [x], pt. [x],  $\P$  [x]. *Id.* pt. [x],  $\P$  [x].

## **B.** Rules for Courts-Martial.

MANUAL FOR COURTS-MARTIAL, UNITED STATES, R.C.M. [xxx] (2024) [hereinafter MCM]. MCM, *supra* note [x], R.C.M. [xxx].

<sup>&</sup>lt;sup>41</sup> Use abbreviations found in *Bluebook* Tables T6, T10, and T13, such as "A.F. L. REV." and "MIL. L. REV.," or the citation format provided by the source, as with "NAVAL L. REV."

<sup>&</sup>lt;sup>42</sup> Use abbreviations found in *Bluebook* Tables T6, T10, and T13, such as "ARMY LAW.," or the citation format provided by the source, as with the Air Force journal "REPORTER."

<sup>&</sup>lt;sup>43</sup> Use this format if no date of issue is available (e.g., Lieutenant Colonel Robert Murdough, *Using Red Team Techniques to Improve Trial Advocacy*, ARMY LAW., no. 1, 2021, at 91) (*Bluebook* Rule 16.5).

<sup>&</sup>lt;sup>44</sup> When citing to information on the first page of the article, a pincite is required and will read "at [starting page], [starting page]."

Id. R.C.M. [xxx].

# C. Military Rules of Evidence.

MANUAL FOR COURTS-MARTIAL, UNITED STATES, M.R.E. [xxx] (2024) [hereinafter MCM]. MCM, *supra* note [x], M.R.E. [xxx]. *Id.* M.R.E. [xxx].

# D. Uniform Code of Military Justice.

UCMJ art. [x] ([year]).

# E. Army Regulations.

U.S. DEP'T OF ARMY, REGUL. 600-20, ARMY COMMAND POLICY para. 4-12 (6 Feb. 2025) [hereinafter AR 600-20].

U.S. DEP'T OF ARMY, REGUL. 27-10, MILITARY JUSTICE (8 Jan. 2025) ([hereinafter AR 27-10].

# F. Committee Hearings.

Testimony on Sexual Assaults in the Military: Hearing Before the Subcomm. on Pers. for the S. Armed Servs. Comm., 113th Cong. (2013) (statement of BriGette McCoy).

# G. Pending Legislation.

Bill to Reform Article 32 of the Uniform Code of Military Justice, H.R. 3360, 113th Cong. (2013).

# H. U.S. Army JAG Corps Strategic Communications.

The Judge Advoc. Gen. & Deputy Judge Advoc. Gen., U.S. Army, TJAG & DJAG Sends, vol. 40-16, Principled Counsel—Our Mandate as Dual Professionals (9 Jan. 2020).

Memorandum from The Judge Advoc. Gen., U.S. Army, to Judge Advoc. Legal Servs. Pers., subject: Military Justice Redesign—Policy Memorandum 19-01 (18 July 2019) [hereinafter Military Justice Redesign Memo].