



U.S. Department of Justice

Office of the Solicitor General

Washington, D.C. 20530

June 2, 2026

Honorable Scott S. Harris
Clerk
Supreme Court of the United States
Washington, D.C. 20543

Re: Zhuo H. Zhong v. United States, No. 25-742

Dear Mr. Harris:

The above-captioned pending petition for a writ of certiorari seeks this Court’s review of two questions, one of which is whether the Air Force Court of Criminal Appeals has authority to review an “indorsement” accompanying petitioner’s judgment and stating that his conviction triggered 18 U.S.C. 922’s prohibition on possession of firearms. This letter is submitted to apprise the Court of two updates to Air Force practice that postdate the lower-court proceedings in this case. First, in January 2026, the Secretary of the Air Force revised Instruction 51-201 to state that the Staff Judge Advocate “may make corrections to the first indorsement,” but deleted the words “at any time” that had been included in prior versions of that Instruction. Department of the Air Force Instruction 51-201, *Administration of Military Justice* ¶¶ 21.3, 21.10 (Jan. 9, 2026). Second, through a guidance memorandum in February 2026, the Secretary of the Air Force ordered “immediate[] changes” to “implement[] the removal of first indorsements from courts-martial documents.” Department of the Air Force, *Guidance Memorandum to Department of the Air Force Instruction (DAFI) 51-201, Administration of Military Justice 1* (Feb. 4, 2026), <https://perma.cc/F7NH-TE5R>. The memorandum is in itself void after one year, or sooner if it is incorporated by interim change or revision of Instruction 51-201 before that date. *Ibid.* Accordingly, the Air Force is not currently requiring indorsements to accompany judgments in the way that occurred in petitioner’s case.

I would appreciate it if you could circulate this letter to Members of the Court.

Sincerely,

D. John Sauer
Solicitor General

cc: See Attached Service List

25-0742
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