



The United States Coast Guard Judge Advocate General's Annual Report

August 2025

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Coast Guard Missions

One of the great strengths of the United States Coast Guard (USCG) is the broad suite of legal authorities that underpins its eleven statutory missions. Under the Department of Homeland Security, the U.S. Coast Guard is at all times an armed force—a full time military, multi-mission, maritime organization with a true peacetime mission. The USCG has a work force of approximately 93,000 active duty, auxiliary, reserve, and civilian personnel, more than 2,000 vessels and aircraft, and 1,200 shore locations. The Coast Guard is the principal federal agency responsible for maritime safety, security, and environmental stewardship in U.S. ports and waterways. The Coast Guard protects and defends more than 100,000 miles of U.S. coastline and inland waterways and safeguards an Exclusive Economic Zone encompassing 4.5 million square miles stretching from north of the Arctic Circle to south of the equator, from Puerto Rico to Guam, encompassing nine time zones. The Coast Guard also exercises broad authorities on the high seas. At its core, the Coast Guard is always ready, resilient, and capable of enhancing America’s maritime safety, security, and prosperity. The Office of the Judge Advocate General—known as “CGJAG”—includes judge advocates, civilian counsel, reserve attorneys, and enlisted and civilian support staff. CGJAG is involved in every facet of Coast Guard operations and mission support.

When the Coast Guard joined the Department of Homeland Security, its statutory authorities were codified under 6 U.S.C. § 468 with a distinction between homeland and non-homeland security missions. These missions are described below.

Homeland Security Missions

Drug Interdiction. Drug Interdiction supports national and international strategies to deter and disrupt the market for illegal drugs, dismantle Transnational Organized Crime and Drug Trafficking Organizations, and prevent transnational threats from reaching the United States. The Coast Guard is the leading federal agency for drug interdiction on the high seas.

Defense Readiness. The Defense Readiness mission exercises the Coast Guard’s authorities and capabilities as an armed service to support the National Military Strategy. Lawyers advise both afloat and ashore commands on the authority to conduct Coast Guard, DoD, and joint operations; adherence to proper use of force and the standing rules of engagement; and the legal risk for conducting interdictions and boardings in support of domestic and international missions.

Ports, Waterways, & Coastal Security. The Ports, Waterways, and Coastal Security (PWCS) mission protects people and property in the Marine Transportation System by preventing, disrupting, and responding to terrorist attacks, sabotage, espionage, or subversive acts. Activities under PWCS include preparedness planning and exercises; initiatives to enhance the resilience of maritime Critical Infrastructure and Key Resources as well as the Marine



Transportation System; the execution of antiterrorism and counterterrorism activities; and initial recovery efforts after attacks.

Migrant Interdiction. Migrant Interdiction operations provide effective law enforcement presence at sea and achieve three main objectives: deter undocumented migrants and transnational smugglers from using maritime routes to enter the U.S.; detect and interdict undocumented migrants and smugglers far from the U.S. border; and expand Coast Guard participation in multi-agency and bi-national border security initiatives. Coast Guard lawyers provide real-time advice to operational commands on Migrant Interdiction operations in South Florida and the Caribbean areas of operation.

Figure 1: A Coast Guard Cutter Reliance (WMEC 615) small boat crew conducts operations in the Gulf of America, July 15, 2025. Reliance's crew completed a 60-day maritime border security patrol to deter illegal migration, fishing and smuggling in the region.



Law Enforcement.

Law Enforcement involves the enforcement of marine resource regulations on foreign fishing vessels. This takes two forms. The first aspect involves the deterrence, detection, and interdiction of illegal foreign fishing vessel incursions into the U.S. Exclusive Economic Zone (EEZ), which represent a threat to the nation's renewable natural resources and a violation of United States sovereignty. The second aspect involves ensuring compliance with international agreements for the management of living marine resources.

Non-Homeland Security Missions

Aids to Navigation. The United States operates the largest Aids to Navigation (ATON) constellation in the world. Coast Guard navigational aids include not only traditional floating buoys, fixed structures such as pilings, day boards, ranges, and lighthouses, but also electronic systems like the Global Positioning System and the Nationwide Automatic Information System, which is required on most commercial vessels operating in U.S. waters. In addition to federally owned ATON, waterways are marked by thousands of privately owned aids, which are permitted by the Coast Guard and must comply with Coast Guard regulations. Coast Guard lawyers work closely with the Office of Navigation Systems to develop regulations and policy consistent with statutory authority to establish and maintain ATON. This work also includes advice on regulation and policy required navigational safety equipment on commercial vessels.

Search & Rescue. The Coast Guard is the lead federal agency for maritime search and rescue in U.S. waters. Coast Guard personnel render aid to those in distress in the maritime environment and elsewhere when interdiction can influence the outcome of life-threatening incidents. Search and rescue efforts of afloat and airborne Coast Guard Units are coordinated with those of other federal, state, and local responders. These operations rely on Captain of the Port authorities and responsibilities to synchronize response efforts on waterways after an incident or disaster. Coast Guard lawyers provide organizational and operational advice on the execution of the Coast Guard's authority and obligations, both domestically and internationally.

Living Marine Resources. Living Marine Resources Law Enforcement is an obligation under the Magnuson-Stevens Fishery Conservation and Management Act, the Endangered Species Act, and several other federal laws focused on the protection of marine resources. The core objective of these efforts is to provide effective and professional enforcement to advance national goals for the conservation, management, and recovery of living marine resources, marine protected species, and national marine sanctuaries and monuments.

Maritime Environmental Protection. The Coast Guard works with a variety of groups and organizations to protect the marine environment. There are five areas of emphasis in the Marine Environmental Protection mission: (1) prevention—stopping pollution before it occurs through training, equipment, and procedures; (2) enforcement—providing civil and criminal penalties for illegal acts; (3) surveillance—protecting the marine environment by conducting pollution overflights, vessel examinations, harbor patrols, transfer monitoring, and facility inspections; (4) response—removing and mitigating spills of oil and hazardous substances; and (5) in-house abatement—ensuring that Coast Guard vessels and facilities comply with federal environmental laws and regulations.

Marine Safety. The focus of the Coast Guard's marine safety mission is the prevention of deaths, injuries, and property loss. Marine safety responsibilities include ensuring the safe and environmentally sound operation of millions of recreational vessels and thousands of U.S. flagged commercial vessels. The Coast Guard develops and enforces Federal marine safety regulations, certifies and provides credentials to more than 218,000 mariners, documents U.S. vessels, investigates marine casualties and shares its findings, and conducts compulsory inspections as well as voluntary safety exams. Coast Guard attorneys provide legal advice to program elements within the Coast Guard to interpret existing laws and regulations to determine the extent of Coast Guard authority to act in the safety realm, both with respect to safety equipment required on vessels and the qualifications of those individuals working aboard.

Polar, Ice, & Alaska Operations. The Polar Regions are a focal point of maritime interest in shipping, living marine resources, mineral and oil exploration, and scientific research domains. As a result, Coast Guard presence in the Polar Regions is growing as operational demands expand. Coast Guard polar icebreakers support national security and sovereignty, and national science missions in the Polar Regions.

Coast Guard JAG Workforce

CGJAG supports all nine Coast Guard Districts; the Coast Guard's Atlantic and Pacific Areas headquarters; in Coast Guard Headquarters in Washington, DC; and in several other operational locations including Coast Guard Cyber Command—the Service's first operational command with worldwide responsibility. CGJAG counsel at the Legal Service Command, principally located in Norfolk, VA, and Alameda, CA, serves the Mission Support Community and provides specialized legal services to the rest of the Coast Guard. In addition, CGJAG assigns personnel to five DoD Combatant Commands.

CGJAG is composed of a small, yet dedicated workforce. There are currently 261 total active-duty Judge Advocates, 47 reserve Judge Advocates, 115 civilian attorneys, and 86 support staff.

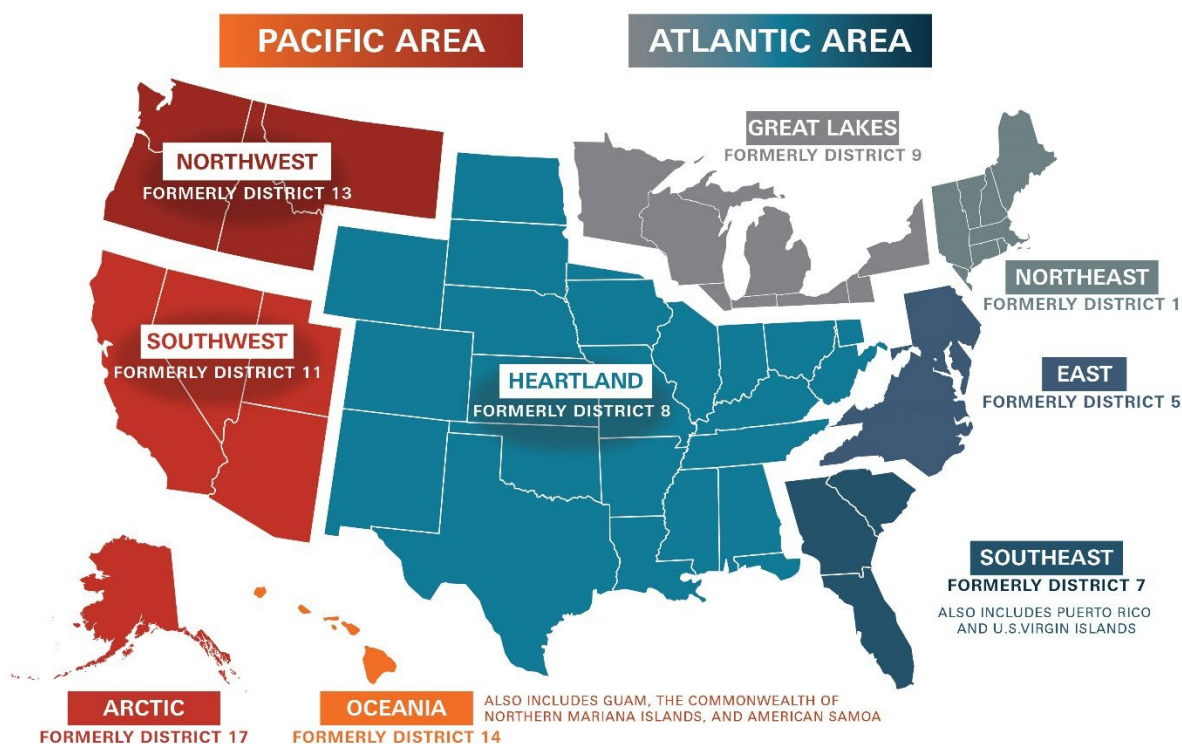


Figure 2: In 2025, the U.S. Coast Guard renamed its operational districts from numerical to geographic designations—a key initiative under Force Design 2028.

Coast Guard JAG Mission



CGJAG MISSION

We work together to deliver expert legal services across the full spectrum of Coast Guard missions that promote their effective, efficient, lawful, and safe execution, and we support Coast Guard people.

PRINCIPLES FOR THE DELIVERY OF LEGAL SERVICES BY CGJAG

These principles guide how CGJAG organizationally supports the Coast Guard and one another

We serve to support Coast Guard missions and people

1. Provide every leader with a lawyer, ethical advisor, and counselor.
2. Identify issues and provide risk-based options to achieve mission success while flexibly applying and preserving Coast Guard authorities.
3. Drive to desired and desirable outcomes within the letter and spirit of the law; promote the principles of Coast Guard operations.
4. Be active and not passive: deliver services that are on time, right, and precise and that are anticipatory, innovative, and responsive.

We all share responsibility for the delivery legal services

5. We are one team; there is no wrong legal office to call.
6. Services are aligned and consistent, and integrated across subject matter and commands.
7. We work together to ensure justice and fairness; we demand in each other candor, collegiality, ethical conduct, and personal accountability.
8. CGJAG leaders communicate directly with one another regardless of rank or position to protect Coast Guard and public interests.
9. CGJAG applies resources without geographic or organizational limitation to support mission execution.
10. Every counsel will have a senior counsel; we seek review of work product from a superior, peer or subordinate counsel when we can; we will act deliberately and decisively when senior counsel is unavailable.



PRINCIPLES OF LEGAL PRACTICE LINKED TO PRINCIPLES OF COAST GUARD OPERATIONS

These principles guide the daily practice of Coast Guard judge advocates and counsel

Clear Objective: Understand the mission, context, and the task at hand. Drive to a desired and desirable outcome that enables mission execution and is consistent with the Constitution, law, and policy.

Effective Presence: Be active and prepared. Provide precise, actionable, and correct legal advice or counsel when and where it is needed most. Seek physical presence at the point of decision and "take the pen" when it will advance the mission.

Unity of Effort: Integrate and respect the authorities, capabilities, and perspectives of partners, assembling and relying on diverse legal teams and collaboration.

On-Scene Initiative: Act deliberately and decisively when remote senior counsel is unavailable.

Flexibility: Adjust past experience, knowledge, and abilities to the contingency at hand. Remember that swift linear or parallel change in the character and demands of a response is the rule and not the exception.

Managed Risk: Provide advice and options based on the best facts and law available, accepting legal risk to achieve the mission without placing people or the Service in jeopardy. Remember that the decision maker, not the attorney, decides with a sound understanding of the risks.

Restraint: Relentlessly seek to enable to mission execution, but always provide an accurate and honest appraisal of applicable law – even if it may constrain operations. Respect the civil liberties and dignity of Americans and others; preserve and protect Coast Guard foundational legal authorities.



CGJAG Program Development

The Office of Legal Policy and Program Development (CG-LPD)

CG-LPD develops and executes policies and programs to ensure the health of the legal program and the effective delivery of legal services throughout the Coast Guard. The office coordinates recruiting, assignments, training, professional responsibility, and professional development of judge advocates, civilian counsel, paralegals, and legal yeoman. The office also manages the acquisition, distribution, and use of legal program resources and performance support tools.

Coast Guard judge advocates are created through the funded legal education program and the Direct Commission Lawyer (DCL) programs. Under the funded legal education program, select Coast Guard members earn their juris doctorates while on active duty with their education funded through the Coast Guard's advanced education program. Alternatively, law students and licensed attorneys can apply for the DCL program. Direct Commission Lawyers commission as officers and sign four-year extended active-duty contracts. After their initial pipeline training, new DCLs get exposure to Coast Guard operations during one-to-two-week operational familiarization tours onboard Coast Guard cutters or at operational units.

CGJAG Recruiting



Figure 4: John Saran (right)—partner at Holland & Knight, auxiliarist for the Coast Guard, and father of two—was selected to join CGJAG through the Coast Guard's Direct Commission Lawyer-Selected Reserve program. He'll continue his civilian career while serving in uniform part time, protecting the nation and providing essential support to service members.



Figure 3: Sarah Cooper (right), served as an intern at the Office of the Chief Prosecutor, was selected by the fall 2024 DCL selection panel, and will be commissioned in summer 2025.

CGJAG is actively expanding and enhancing multiple recruiting and retention initiatives including the legal internship program and signing and retention bonuses. In December 2024, the Coast Guard launched a new accession program to hire law students in their second year of law

school. The first class of second-year law students will commission in late 2025, enter the reserves while completing law school, and begin active duty in summer 2026.

Charleston School of Law Mock Court-Martial Competition

In March 2025, the Office of the Chief Prosecutor and Charleston School of Law hosted the first mock court-martial competition. Students from eight law schools across the country came together for the three-day competition, exercising their mock trial skills and learning more about the military justice system. Coast Guard judge advocates and judges, along with Charleston School of Law faculty and local attorneys, provided participants with best practices to develop their advocacy skills.



Figure 5: Rear Admiral Bill Dwyer (back row, far right in uniform)—Chief Prosecutor of the U.S. Coast Guard—with student-attorneys at the Charleston School of Law in March 2025.

Coast Guard Legal Service Command (LSC)

Claims Division (LSC-C)

LSC Claims Division (LSC-C) staff is located in Norfolk, VA and consists of two Attorneys; one Auxiliarist Attorney; one Legal Administrative Specialist (Claims Examiner); and three Paralegals.

Defensive Claims. LSC-C opened 146 cases in which claimants sought approximately \$303 million in damages against the United States under the Federal Torts Claims Act arising out of the official activities of the Coast Guard or its members. These cases ranged from minor car accidents involving government vehicles, to larger accidents resulting in injuries or loss of property. Since last year, LSC-C closed 133 defensive claims, approving settlements totaling approximately \$199,000 in damages. The efforts of the LSC-C defensive claims paralegals continue to receive outstanding results through mandatory and recurring financial audits.

Affirmative Claims. The LSC-C receives weekly support from a Coast Guard Auxiliarist attorney who handles all affirmative claims. Last year, the LSC-C Auxiliarist attorney helped the Coast Guard collect approximately \$283,000 on an urgent rebuild of a dual-purpose structure functioning as range lights on the Columbia River. This quick response to the damaged structure enabled minimal disruption to Coast Guard operations by quickly coordinating a fix by the responsible party—ultimately saving taxpayer money. Tireless efforts by our LSC-C Auxiliarist attorney in helping operational units navigate the affirmative claims process has encouraged other units to seek reimbursement for damages to government property caused by third parties.

Following a September 2024 tug collision with a pier at Coast Guard search and rescue Station Cape Disappointment on the Columbia River, attorneys from Coast Guard Northwest District in Seattle, WA provided critical short fuse legal advice to Station and engineering personnel to effect immediate response efforts to mitigate damage to Coast Guard property and the marine environment. Following the response, Northwest District attorneys worked with the Coast Guard Claims and Litigation Division and Legal Service Command to develop a comprehensive legal strategy in support of the marine casualty and claims investigations alongside the long-term pier repair project. Attorneys also consolidated critical records from multiple stakeholders to prepare for potential litigation.



Figure 6: A 47-foot Motor Life Boat gets underway from Coast Guard Station Cape Disappointment.

Household Goods Claims. The Household Goods Branch consists of a lead attorney and a paralegal. The Household Goods Branch opened 77 household goods claims with members seeking to recover approximately \$311,000 in damages over the last reporting year and closed 59 cases approving settlement payments to members of approximately \$31,000. The Branch continues to process demand actions against Transportation Service Providers recouping approximately \$24,000 owed to the United States, the Coast Guard, or its members.

Contingency Response

The LSC Contingency Response Program has evolved to meet new and diverse challenges expanding beyond normal hurricane response efforts over the past few years. The LSC Contingency Response Officer role is filled by a LSC Lieutenant. The LSC Contingency Response Officer managed an active roster of prepared CGJAGs to respond to several contingencies in the Southeast during five separate coordination events. In addition to managing the roster of available active-duty Judge Advocates for response efforts, the Contingency Response Officer represents the LSC on all Operational Logistics Command and Service Center (LC/SC) calls and coordinates legal support and training to the Reserve Judge Advocate General and other CGJAG legal offices. In April 2025, the Reserve Judge Advocate General program facilitated a reserve CGJAG-wide exercise and training in Portsmouth, VA to prepare for contingency response. The alignment between the reserve CGJAG program and active-duty component remains critical to ensuring readiness for whatever contingency may arise.

Command Services Division (LSC-CSD)

The Legal Service Command—Command Services Division (LSC-CSD) is comprised of two Command Service Branches, one located in Norfolk, VA and the second in Alameda, CA. LSC-CSD provides support to the LSC Staff Judge Advocates (SJAs), who advise the mission support field enterprise. LSC-CSD also provides short-term coverage for the Training Center legal offices when an office needs additional support.

LSC-CSD attorneys provide support to the LSC SJAs and provide legal advice directly to the field support units on a myriad of legal issues. These subject areas include allegations of criminal misconduct, matters involving ethics and standards of conduct, administrative investigations, line-of-duty determinations, civilian personnel disciplinary issues, investigations, administrative separation boards, memoranda of agreement or understanding, Privacy Act/Freedom of Information Act (FOIA) review, as well as installation, environmental, real property, and fiscal law matters. The LSC-CSD oversees the Commanding Officer's Quick Reference Legal Guide, one of the most utilized go-to legal resource for field commanders. LSC-CSD spearheaded and sought input and updates from CGJAG offices and subject matter experts throughout the Coast Guard resulting in a soon-to-be published product which captured multiple new and significant policy changes in an easy-to-read and use product, ensuring enhanced compliance with Coast Guard law and policy across the service.



Seattle Seahawks. The LSC-CSD provided legal advice and guidance to Base Seattle’s Morale, Wellbeing, Recreation (MWR) program. On 15 April 2025, Base Seattle MWR held its annual “Admiral’s Cup” Flag Football tournament at the Seattle Seahawks’ stadium—Lumen Field. This year, the Seahawks’ proposed licensing agreement for use of the stadium included a significant change in its liability provision and required that Base Seattle MWR have \$5 million in coverage. LSC identified concerns about the CG MWR’s ability to comply with the Seahawks’ contract requirements in the event of a claim. The proposed licensing agreement did not accurately capture the Coast Guard’s ability to assume responsibility considering existing policy and legal classifications of MWR events. The LSC analyzed the nuances between the use of appropriated and non-appropriated funding and the processing of claims under the Federal Torts Claims Act, then effectively negotiated with Seahawks counsel to arrive at an acceptable and accurate provision. The negotiations concluded in time for the event which included ten Coast Guard teams cheered on by family and friends and the Seattle Seahawks mascot, Blitz. Rear Admiral Charles Fosse—the Coast Guard District Northwest Commander—presided over the awards ceremony.

Procurement Law (LSC-APL)

The LSC Procurement Division (LSC-APL) provides procurement legal support across the Coast Guard sustainment community through the dedicated efforts of nine civilian staff attorneys in Norfolk, VA, Elizabeth City, Charleston SC, and Alameda, CA. Attorneys specialize in particular substantive contracting areas (e.g., Aviation, Ship Repair, Construction, Operational Logistics, Emergency and Contingency Operations and Information Technology) and maintain proficiency and mission understanding in all areas through coordination and collaboration with stakeholders, weekly discussions with all sustainment community procurement law attorneys, and handling procurement legal support for procurements in the other sustainment contracting areas on a periodic basis.



Figure 7: LSC Command Service Division attorneys at the Seattle Seahawks stadium.

Cyber, Intelligence, and Information Law

Office of Information and Intelligence Law (CG-LII)

CG-LII advises on the collection, storage, and sharing of government information; Coast Guard intelligence activities; cyber security and operations; telecommunications policy; the development and use of information technology; data management, and the use of artificial intelligence to inform operations. The Office administers the Coast Guard's Intelligence Oversight program on behalf of The Judge Advocate General in their capacity as the Senior Intelligence Oversight official, ensuring nearly 700 members of the Coast Guard National Intelligence Element comply with applicable laws, Presidential Directives, and Intelligence Community Directives.

Intelligence Law. Intelligence law attorneys provided advice and coordination on a broad swath of Coast Guard actions implementing Executive Orders on Securing our Borders and Territorial Integrity, Designating Cartels and Other Organizations as Foreign Terrorist Organizations and Specially Designated Global Terrorists, among other recent Presidential actions. CG-LII attorneys conducted legal reviews for the effective use of the full scope of law enforcement, regulatory, and national intelligence authorities to enable Coast Guard intelligence actions across the force. CG-LII attorneys supported Coast Guard intelligence enabling operations against fentanyl and other counternarcotic actions, ensuring the Coast Guard approaches its statutory authority as enablers to execute network illumination and conduct drug interdiction actions. CG-LII attorneys provided key legal analysis of the impact of designation of international cartels as Foreign Terrorist Organizations (FTO) under the Immigration and Nationality Act and as Specially Designated Global Terrorists (SDGT) under the International Emergency Economic Powers Act. Attorneys in CG-LII completed a legal memorandum to analyze the deliberate and incremental expansion of the use of existing authorities in support of a more streamlined and effective method of screening vessels arriving to the United States. This analysis guided the intelligence enterprise on a legally sufficient process to execute the information flow in the use of law enforcement and national intelligence authorities within a single intelligence command. Further, Intelligence Law attorneys from CG-LII supported with legal review of the update to the policy governing digital evidence search and seizure to ensure both law enforcement and national intelligence equities are protected.

Great Lakes District participated in an interagency forum, providing Coast Guard input for the Northern Border Coordination Act Senate Bill. Great Lakes attorneys promoted Coast Guard equities in the establishment baseline requirements that align with Senate Bill S.2291 and the establishment of the Northern Border Coordination Center.

Atlantic Area attorneys served as the primary legal advisor for a new Identity Operations civilian position established at Atlantic Area, fostering area-wide improvements to law enforcement intelligence collection activities in international waters and establishing a framework for a second Identify Operations position at Pacific Area.

Intelligence Oversight. In 2024-2025, CG-LII attorneys completed a full cycle of Intelligence Oversight Inspections across the Coast Guard Intelligence Enterprise, after updating the governing inspection guide. CG-LII attorneys also completed an update of the Intelligence Law curriculum at the Intelligence Officer Course and IS “A” School at Coast Guard Training Center Yorktown, where USCG intelligence professionals receive initial training.



Figure 8: LCDR Katie Graichen, front row, second from right and LT Matt Armstrong, back row, third from left, LCDR Brittany Akers, front row, third from left provided legal support to counternarcotics policy at Joint Interagency Task Force- South.

Information and Information Technology Law. Over the last year, CG-LII attorneys serving in the information law practice group supported the Information Sharing and Safeguarding Governance Board (ISSGB) and provided critical guidance regarding proposed information sharing agreements with numerous partner nations, ensuring information sharing and safeguarding are executed under proper authorities and departmental policies. Attorneys in the Information law practice group also provided expert legal review and advice on national, departmental, and Coast Guard policies regarding Artificial Intelligence governance and use of generative artificial intelligence. CG-LII attorneys supported working groups at the Department of Homeland Security (DHS) regarding Departmental directives and instructions for the cataloging and compliance requirements for AI use case, including representing the Coast Guard on the DHS Responsible AI Use Group, DHS AI Policy Working Group, and DHS OGC Emerging Technology Practice Group. In the Spring of 2025, CG-LII provided updated guidance to Coast Guard leaders and provided summaries and advice on the new AI policy contained in OMB-M-25-21 (Accelerating Federal Use of AI through Innovation, Governance, and Public Trust) and OMB-M-25-22 (Driving Efficient Acquisition of Artificial Intelligence in Government). CG-LII attorneys also assisted in the development of Coast Guard policies regarding the use of generative artificial intelligence, and guided Coast Guard offices and units in the proper reporting of AI use cases. These actions lay the foundation for future implementation of a technology that will enable significant operational and administrative efficiencies for Coast Guard missions.

Office of Cyber Forces. CG-LII supports the Office of Cyberspace Forces which has the mandate to man, train, and equip Coast Guard cyberspace forces and develop appropriate strategy, policy, and doctrine for Coast Guard Cyber Command. CG-LII's embedded attorney with the Office of Cyberspace Forces provided advice regarding executive orders, legislation, and national security priorities related to the defense of the Coast Guard's network, efforts to protect the cyberspace associated with the marine transportation system, and the development of capabilities for full-spectrum cyberspace operations. This past year, CG-LII attorneys coordinated with the DHS Office of General Counsel on the legal impact of Executive Order 14144, Strengthening and Promoting Innovation in the Nation's Cybersecurity, to ensure Coast Guard interoperability with the Department of Defense Information Network.

Coast Guard Cyber Command (CGCYBER) Legal Office

CGCYBER attorneys advise the Coast Guard's operational cyberspace unit on all aspects of the command's efforts to defend Coast Guard networks, protect the Marine Transportation System, and operate in cyberspace.

The CGCYBER legal office worked closely with the U.S. Cyber Command (USCYBERCOM) Office of the Staff Judge Advocate to draft an Annex to a 2017 Memorandum of Agreement between the Department of Defense and the Department of Homeland Security regarding Cooperation on Cybersecurity and Cyberspace Operations. The Annex, signed by the Secretary of Defense and the Secretary of Homeland Security, recognizes Coast Guard cyber forces as having interoperability with Department of Defense cyber forces and enables direct support between CGCYBER and USCYBERCOM. Additionally, the legal team has supported CGCYBER in exercises with military and agency partners to ensure robust cyber readiness.

The CGCYBER Legal Office advised the CGCYBER Assessment and Authorization Department and reviewed documentation for interconnections to the network, enabling the flow of critical information while guaranteeing appropriate safeguards for networks.

CGCYBER attorneys supported operations that protect the marine transportation system. In the last year, they provided operational legal advice for CGCYBER's Cyber Protection Teams (CPTs) execution of over forty Defensive Cyber Operations (DCO) across the MTS. CPT missions identified more than 190 Known Exploitable Vulnerabilities (KEVs) and provided mitigation advice to improve the cyber resiliency of the MTS, ensuring the flow of approximately \$5.25 trillion in goods and services, constituting 18% of the U.S. GDP. CGCYBER attorneys assisted in the preparation of CGCYBER's fourth annual Cyber Trends & Insights in the Marine Environment (CTIME) Report. It is a summary of findings from all CPT missions conducted in the last year and relevant best practices to remediate vulnerabilities and secure critical systems. This year's finding showed a decline in common vulnerabilities and growth in assessment of operational technology platforms.



Figure 9: CGCYBER attorneys assisted in the preparation of CGCYBER's fourth annual Cyber Trends & Insights in the Marine Environment (CTIME) Report.

Finally, the legal office provided legal advice and intelligence oversight to the CGCYBER Intelligence Department. The CGCYBER Intelligence Department is comprised of both National Intelligence Element (NIE) personnel conducting intelligence activities under Executive Order 12333, and Law Enforcement Intelligence Element (LEIE) personnel conducting activities under Coast Guard law enforcement and regulatory authorities. This year, CGCYBER attorneys have provided intelligence oversight training to 29 NIE members and reviewed intelligence activities for compliance with law and policy.

Environmental Law

Coast Guard attorneys advise on the agency's own compliance with environmental laws and provide analyses of environmental impacts of deepwater port permits, bridge permits, the acquisition and homeporting of vessels (e.g., Polar Security Cutters and Offshore Patrol Cutters), the transfer of historic lighthouses, the regulation of waterway traffic, and the management and cleanup of federal property. These attorneys also advise on criminal violations of marine pollution statutes and Comprehensive Environmental Response Compensation and Liability Act (CERCLA) cases, especially where it minimizes future liability related to transactions involving potentially contaminated property.

Environmental Compliance

The Legal Service Command (LSC) provides environmental compliance advice and guidance to its robust portfolio of client commands within the mission support enterprise. As an example, attorneys within the LSC General Law Division provide advice and guidance on the Resource Conservation and Recovery Act (RCRA) - law that defines hazardous waste as a solid, semi-solid, liquid, or contained gas that poses a substantial present or potential hazard to human health or to the environment. RCRA issues routinely arise in the Base Kodiak area of responsibility, requiring routine engagement with LSC-LGL environmental law attorneys to ensure compliance with various administrative and civil actions proposed by the Environmental Protection Agency (EPA). Additionally, LSC-LGL real property attorneys routinely assist clients seeking to acquire, construct on, or lease property, with navigating the complex requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the impacts these requirements have on Coast Guard shore and infrastructure projects.

Maritime Environmental Response

Coast Guard attorneys provide advice on the Service's domestic and international authorities, responsibilities, and roles in oil and hazardous substance spill response planning and operations under the Clean Water Act, Oil Pollution Act (OPA), and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Coast Guard maintains Joint Contingency Plans with all countries with which it shares maritime boundaries to maintain close partnerships and ensure coordinated responses to oil or hazardous substance pollution incidents. Coast Guard attorneys advise leadership on negotiations regarding agreements with Canada and Mexico addressing coordinated response to potential marine pollution incidents and on interagency agreements and partnerships to coordinate response planning, research, and operations.

Coast Guard Oceania District. Oceania District Attorneys provided guidance to international partners in New Zealand and Samoa after the New Zealand vessel HMNZS *Manawanui* struck a reef approximately one mile from the coast of Samoa and sank. Maritime New Zealand representatives discussed with Coast Guard Oceania the best way to support lightering and salvage decisions. The Coast Guard could provide support with waste management and oil spill

response through the National Response Team or a regional group in Oceania called The Secretariat of the Pacific Regional Environment Programme (SPREP). SPREP assists Pacific Island member countries to address environmental issues. Additionally, the U.S. Navy has the Supervisor of Salvage in Honolulu, HI, which owns and operates the Emergency Ship Salvage Material system for the physical removal and pollution abatement capability. Coast Guard members from Oceania District traveled to Samoa to support New Zealand to remove fuel from the vessel.



Figure 10: A Royal New Zealand Navy ship, HMNZS Manawanui ran aground and sunk off Samoa while carrying out a tropical reef survey in October 2024. Credit: Radio New Zealand.

Coast Guard Arctic District. Arctic District attorneys supported review and consideration of annual, expedited recertification applications by two Regional Citizen Advisory Councils, mandated by Oil Pollution Act of 1990 to give citizens an active role in the production and maritime transport of Alaska oil, leading to increased research, safety initiatives, and public participation. Additionally, the Arctic District is an active contributor to Alternative Planning Criteria review, balancing regulatory requirements, Vessel Response Plans, environmental safety and spill response, and the practical limitations of remote Alaska.

Maritime Environmental Criminal and Civil Enforcement.

As a maritime law enforcement agency, the Coast Guard works with the Department of Justice to prosecute environmental crimes. These cases frequently involve efforts by Coast Guard District legal offices, the Office of Maritime and International Law's Environmental Law Division (CG-LMI-E), Sectors, Marine Safety Units, and the Coast Guard Investigative Service (CGIS).

Coast Guard Northeast District. Northeast District attorneys in Boston, MA worked with Sector New York, the Coast Guard Investigative Service, and the U.S. Attorney's Office for the District of New Jersey, on the investigation and criminal enforcement against M/V KRITI RUBY. The case concluded in December 2024 with guilty pleas entered by the owner and operator of the vessel, both Greek shipping companies, for violations of the Act to Prevent Pollution to Ships, falsifying records, and obstruction of justice. These charges arose from the presentment of false Oil Record Books in two U.S. Ports, Jacksonville, FL and Newark, NJ that did not account for the discharge of oily waste into the sea via the ship's sewage system and bypassing the Oily Water Separator as well as concealment of this bypass equipment in a seal void space onboard the vessel. In accordance with the plea, the companies were sentenced to pay a criminal fine of \$3.75 million and a community service payment of \$1.25 million to the National Fish and Wildlife Foundation. The recidivist company was also sentenced to a five-year term of probation under a

strict Environmental Compliance Plan. In addition, both the Chief and Second Engineer onboard the vessel pleaded guilty to violations of APPS for the aforementioned conduct.

Coast Guard East District. East District attorneys worked with Sector Delaware Bay, the Coast Guard Investigative Service, and the U.S. Attorney's Office for the Eastern District of Pennsylvania on the investigation and criminal enforcement against M/V MSC SAMIRA III, a Liberian flagged container ship. On 27 January 2025, during a routine Port State Control examination, a crewmember of M/V MSC SAMIRA III from the engine room provided a note alleging violations of the International Convention for the Prevention of Pollution from Ships (MARPOL) which initiated an expanded MARPOL examination. During the examination, evidence was found that there were multiple instances of the improper discharge of oily water from approximately January 2023 to January 2025 in violation of MARPOL and Act to Prevent Pollution to Ships (APPS). The evidence showed two ways in which the oily water was improperly discharged. First, the engineering team was instructed to connect a hose with a portable pump from the bilge holding tank to the marine sanitation device. This action resulted in untreated bilge water being transferred to the sewage system and subsequently discharged overboard. Second, a member of the engineering team instructed the operation of the oily water separator with the secondary filters intentionally removed from the system. A freshwater line was connected to the sampling line of the oil content meter, compromising its accuracy. This deliberate bypassing of critical components also led to the discharge of oily water. The whistleblower provided video and photo evidence, and the team discovered supporting evidence, to include discrepancies in the oil record book. The case was referred to and accepted by the Department of Justice on 3



Figure 11: Coast Guard inspectors routinely conduct port state control examinations of foreign flagged vessels.

February 2025. The East District attorneys negotiated a \$2 million security agreement with the owner and operator of the vessel that was finalized on 7 February 2025. The agreement ensured that 12 members of the crew, to include the whistleblower, remained in the United States to support the Department of Justice investigation. The case is still pending criminal prosecution.

Coast Guard Southeast District. Southeast District attorneys worked with Sector Charleston, the Coast Guard Investigative Service, and the United States Attorney's Office for the District of South Carolina on the investigation and referral for potential criminal prosecution of a chemical and petroleum transport company and its operator in connection with an illegal oil discharge

from a mobile bulk liquid transport trailer. On February 8, 2024, Sector Charleston Incident Management Division was notified by a regulated facility's Health, Safety, and Environmental Specialist of a discharge of hydraulic oil from a tank trailer into a storm drain adjacent to the regulated facility. The storm drain discharges into Shipyard Creek, a U.S. navigable waterway. The trailer's operator was instructed to dispose of excess oil before loading new product. GPS data and dashcam footage showed the operator stopped at the storm drain for 12 minutes, then returned with an empty tank — far too quickly to have completed a legitimate disposal. Facility employees later observed oil residue and a visible puddle near the storm drain, collected samples, and found them to match the tank trailer's contents. The operator later admitted to the discharge and the matter was referred for potential prosecution under 33 U.S.C. § 1321(b)(3), which prohibits harmful discharges into navigable waters.

Additionally, Southeast District attorneys worked with Marine Safety Unit Port Canaveral, the Coast Guard Investigative Service, and the U.S. Attorney's Office for the Middle District of Florida, on the investigation and referral for criminal prosecution of the M/V LEGIONY POLSKIE, a Liberian-flagged bulk carrier. On January 16, 2025, a whistleblower reported that the vessel had been unlawfully discharging oil sludge and oily water into the ocean. MSU Port Canaveral Port State Control and Investigating Officers expanded the inspection and uncovered 113 falsified entries in the Oil Record Book, supported by documentary and testimonial evidence. A flash drive provided by the whistleblower contained technical documentation on how the illegal discharges were carried out. Witness statements revealed that the Chief Engineer had directed the illegal activity and the falsification of records, in violation of 33 U.S.C. § 1908(a) (MARPOL), 18 U.S.C. § 1519 (Falsification of Records), and 18 U.S.C. § 1001 (False Statements). The vessel and its responsible parties were referred for prosecution based on substantial evidence of deliberate and repeated violations of U.S. and international law.

Coast Guard Heartland District. Heartland District attorneys worked closely with Marine Safety Unit Houma and the Coast Guard Investigative Service to investigate potential environmental crimes involving a U.S.-flagged offshore supply vessel. In February 2025, Coast Guard inspectors discovered an unauthorized oily water separator bypass arrangement had been installed onboard the vessel CAPT WOODROW. Further investigation found evidence that the Chief Engineer pumped oily bilge water directly overboard on multiple occasions. The Coast Guard Heartland District referred the case to the DoJ for alleged violations of the Act to Prevent Pollution from Ships (APPS) and the Clean Water Act.

Heartland District attorneys also provided legal advice for two significant civil environmental violation cases involving foreign vessels. A Sector New Orleans expanded MARPOL examination onboard the tank ship PS CAPRI found evidence that leaking hydraulic oil had been improperly pumped overboard through the ship's ballast water system, and this discharge was not recorded in shipboard logs, in violation of the APPS. And in a similar case, a Sector Corpus Christi expanded MARPOL examination of the tank ship SELINI found evidence of an unintentional overboard discharge of oil through the ship's ballast water system which was not properly recorded in required ship's logs, also in violation of the APPS and Carriage of Liquid Bulk

Dangerous Cargo statutes. Heartland legal support in both of these cases ensured that violations were thoroughly investigated, and secured over \$700,000 in potential civil penalties.

Coast Guard Great Lakes District. Great Lakes District attorneys in Cleveland, OH worked closely with the Coast Guard Investigative Service and the U.S. Attorney's Office for the Western District of New York to investigate and charge Algoma Central Corporation over violations of an existing environmental compliance plan put in place in 2021 after the company pleaded guilty to dumping wastewater in Lake Ontario in violation of the Clean Water Act. Algoma Central Corporation pled guilty to violating the environmental compliance plan and was ordered to pay \$100,000.00 in fines.

Additionally, Great Lakes District attorneys aided the U.S. Attorney's Office for the Western District of Michigan to recover approximately \$32,000.00 in Coast Guard helicopter overflight costs in connection with a first of its kind criminal prosecution of a man charged with the illegal diversion of the Platte River at Sleeping Bear Dunes National Lakeshore in Michigan. Great Lakes attorneys worked with Coast Guard Air Station Traverse City and CG-83 to prepare an agency declaration

which was successfully presented by the Department of Justice, resulting in a post-conviction award by the court for the full amount of restitution costs requested.



Figure 12: A crew member assigned to Coast Guard Station Manistee is hoisted into a helicopter on Jan. 30, 2024, as part of a training exercise with Air Station Traverse City.

Coast Guard Northwest District. Northwest District attorneys deliver rapid, mission-critical legal analysis by synthesizing, international law, Tribal treaties, domestic statutory and regulatory authorities, and Coast Guard policy to support real-time decision-making during maritime emergencies. In one case, an adrift barge dragged 2,600 feet of tow cable through a National Marine Sanctuary and critical Tribal fishing grounds, threatening to rupture and spill hazardous diesel fuel. In another, a capsized 80-foot vessel drifted 179 nautical miles offshore, posing a danger to marine traffic and the environment due to unknown onboard pollutants and limited visibility. Northwest attorneys provided authoritative guidance on emergency ocean dumping, sink exercise authorities, and environmental law—enabling operational commanders to take decisive action that protected sensitive marine habitats, preserved navigational safety, and advanced national interest.

Federal Prosecution Support

CGJAG attorneys work closely with the Department of Justice (DoJ) on various cases. Seven Coast Guard Districts provided Special Assistant U.S. Attorney (SAUSA) support to Coast Guard-led criminal investigations. The Coast Guard also has full time SAUSA positions detailed to the DoJ—filled by judge advocates. These judge advocates represent the United States in prosecuting criminal violations of U.S. law.

An attorney with the National Vessel Documentation Center assisted with a Seaman's Manslaughter case referred to the U.S. Attorney for the Southern District of Florida, Miami, with the successful prosecution of a scuba charter owner-operator of the M/V SOUTHERN COMFORT. On March 29, 2020, the owner-operator negligently struck and killed a diver by engaging the propeller while in close vicinity to the diver. The response to the incident, as well as the investigation and prosecution efforts, included a diverse team across the interagency enterprise in South Florida and Coast Guard Headquarters, including representatives from the Coast Guard Southeast District and numerous sub-units, the Coast Guard Investigative Service, and CG-5P. The owner-operator was found guilty of Seaman's Manslaughter, as well as charges of false statements in vessel documentation and Paycheck Protection Program fraud.

Coast Guard Oceania District. As the sworn Special Assistant U.S. Attorney (SAUSA), LCDR Kenneth Hall—Deputy Staff Judge Advocate at Oceania District—facilitated the criminal referral and provided prosecution support for a Seaman's Manslaughter case, to the U.S. Attorney's Office for the District of Hawaii. The vessel Master backed down over his crewman, severing her leg from her body with the vessel's propeller. At the time the Master was captaining a Manta Ray snorkel excursion with 13 paid passengers on board. The victim died while enroute to the Hospital from loss of blood. The vessel Master later tested positive for Methamphetamine.

In another case, Oceania attorneys supported a Fraudulent MMC Credential, Aggravated Identity Theft case. The commercial vessel Master violently ran aground at a speed of approximately 30 knots with 15 passengers and two crewmen onboard. Five passengers were ejected and a total of nine passengers and one crewman were injured. During the marine casualty investigation, investigators discovered that the vessel Master was not a holder of a Merchant Mariners Credential and had falsified his credentials to obtain employment as a charter captain.

Coast Guard Northeast District. An attorney at the Northeast District assisted the U.S. Attorney's Office for the Southern District of New York in the criminal prosecution of the owner and operator of a vessel that capsized in the Hudson River. The incident resulted in the tragic death of a young boy and woman who drowned. The owner pleaded guilty to seaman's manslaughter, was sentenced to 18 months in prison, and ordered to pay \$50,000 in restitution for the funeral expenses for the victims.

Coast Guard Southeast District. The Southeast District's Special Assistant United States Attorney for the Southern District of Florida helped secure a conviction in a seaman's

manslaughter case. The case involved the owner and operator of a scuba charter vessel negligently engaging the port side propeller as the victim was swimming towards the vessel. The victim was pulled into the propeller and drowned.

The Southeast District's Special Assistant United States Attorney for the District of Puerto Rico provided support to the Extraterritorial Criminal Travel Strike Force program to include prosecuting the cases generated from its investigations. The strike force focuses on human smuggling networks that present national security risks. One case involved the prosecution of a human smuggler carrying 48 individuals from Dominican Republic to Puerto Rico. The vessel capsized and 11 of the people on board drowned. The driver of the vessel was sentenced to nine years in federal prison.

Coast Guard Great Lakes District. Great Lakes District attorneys assisted the Department of Justice in the prosecution and sentencing of Alen Gorishti, a tugboat second mate following a fatal crash on Lake Erie. The tugboat, the *Petite Forte*, was pushing a 360-foot barge, containing 4,600 tons of cement when it crashed into a 19-foot fishing boat killing 55-year-old Roger Burton in 2016. Mr. Gorishti plead guilty to a misdemeanor charge of negligent operation and interference with safe operation of a vessel and sentenced to 10 months in prison.



*Figure 13: Coast Guard first responders arrive at the scene of the fatal crash of the tugboat and barge the *Petite Forte* with Mr. Buton's 19-foot fishing boat.*

Coast Guard Arctic District. A Special Assistant U.S. Attorney for the District of Alaska, LCDR Griffin Deitz was integral to the charging, indictment, and prosecution of a cruise ship crewmember accused of attempted murder. The crewmember is alleged to have stabbed an elderly passenger, as well as a member of the security team, while the ship was in international waters. The prosecution advances safety onboard and throughout the cruise ship industry, which brings approximately 65% of all summer visitors to Alaska and has a total economic output of \$4.5 billion.

Atlantic Area. Atlantic Area attorneys provided prosecutorial support to the Eastern District of Virginia in *United States v. Pahlawan*, a case of first impression involving mariners suspected of transporting weapons of mass destruction off the coast of Somalia. The case stems from a Department of Defense-led boarding with Coast Guard Maritime Security Response Team personnel, where two U.S. Navy SEALs lost their lives. Atlantic Area attorneys assisted Department of Justice attorneys by providing expert advice on legal principles of maritime law enforcement, legal research for motions filings, and witness trial preparation.

General Law

Employment Law

Coast Guard employment and labor law attorneys handled over 55 Equal Employment Opportunity Commission (EEOC) and Merit Systems Protection Board (MSPB) cases during this period. Coast Guard attorneys have continued to work with the Human Resource Specialists and attorneys in the Department of Homeland Security to implement numerous changes and initiatives resulting from the change in administration in January 2025. These efforts included return to office initiatives, elimination of alternative work schedules and the other flexibility, downsizing and restructuring initiatives, and changes to disciplinary protocols. In support of these efforts, Coast Guard employment and labor law attorneys worked with the Civil Rights Directorate to establish a Reasonable Accommodation Advisory Team to assist agency managers in evaluating requests for reasonable accommodation under the Rehabilitation and Pregnant Workers Fairness Acts. In addition, Coast Guard employment and labor law attorneys provided advice to Coast Guard leadership regarding over 201 employment related matters, including advising on several high-profile harassment investigations involving civilian subjects and investigations run by the Office of the Inspector General and the Office of Special Counsel. Headquarters employment and labor law attorneys have worked closely with Human Resources and Civil Rights personnel to refine cooperative processes for reasonable accommodation, Alternative Dispute Resolution, settlement, and disciplinary and performance actions.

Fiscal Law

The fiscal law practice group provided substantive legal research, review and advice on the proper application of statutes, case law, regulations, Executive Orders and policies regarding appropriations and funding of Coast Guard operations; oftentimes involving complex, novel or precedent-setting issues. For example, Coast Guard fiscal attorneys advised Headquarters programs on options available to utilize appropriations nearing expiration. Coast Guard attorneys also participated in various high-visibility, short-fuse decisions in consultation with House Appropriations Committee staff to ensure the Coast Guard would have the requisite authority to continue key acquisition programs in the event of a full-year continuing resolution. We also provided fiscal and appropriations guidance on a myriad of issues, including: funding for traditional ceremonies, purchase of command coins for members of Force Design 2028; shore infrastructure projects; reimbursement of childcare expenses for ombudsmen representatives; Offshore Patrol Cutter homeporting and pier build-out; purchase of a Vessel Incidental Discharge Act (VIDA) database, and the appropriate use of funds for the homeporting of a Fast Response Cutter in St Petersburg, FL. Coast Guard fiscal attorneys also provided input to Coast Guard policy, most notably the Financial Resource Management Manual (FRMM), specifically ensuring that recommendations from the Government Accountability Office were implemented in the latest rewrite.



Real Property

LSC-LGL continues to advise various Coast Guard stakeholders on real property, environmental, and fiscal law matters impacting the proposed homeporting of Polar Security Cutters (three) and Offshore Patrol Cutters (six) at Coast Guard Base Seattle. This \$1.67-2B redevelopment and Polar Icebreaker homeporting project harbors a variety of critical legal issues. The LSC paved the way for the first-ever CERCLA removal action that includes the redevelopment and entire reconstruction of the current Base Seattle piers in Slip 36 (entirely within a Superfund site). In addition to the CERCLA removal action, the Coast Guard is expanding the Base Seattle footprint to homeport the incoming Icebreakers. Bolstered by the Elliott Bay Treaty pertaining to local Federally Recognized Tribes that practice their usual and accustomed (U&A) cultural and commercial fishing in the area, the Coast Guard continues to negotiate several Memorandum of Agreements (MOAs) with each Tribe to capture their approval with the project moving forward. The LSC is working with counsel and Tribal leaders from Muckleshoot and Suquamish Indian Tribes regarding mitigation and compensation terms for lost fishing, gear, profits, and U&A impacts due to CG action the area. As a corollary to the MOAs, the LSC has worked with both the Senate and House Liaisons to draft new authority for the Coast Guard so that it may negotiate compensation and mitigation to the Tribes. The legislative work is called the Property Parity Legislation and the LSC's work was approved in the Senate's version of the CGAA (Section 144). Still awaiting House version which is moving towards Sikes Act parity for the Coast Guard. This will enable the Coast Guard to negotiate in earnest, compensating Tribes for impact upon their U&A rights.

LSC-LGL advised on the issue of whether the U.S. Coast Guard has independent leasing authority and could lease real property without a delegation of leasing authority from the U.S. General Services Administration (GSA). Having to go through GSA would have resulted in a loss of property management flexibility and autonomy and would also have required additional lease reporting through GSA's G-REX database. LSC-LGL advocated that the CG had independent leasing authority and, through thorough legal analysis and written opinion, demonstrated that the G-REX system applied only to federal agencies that did not have independent leasing authority and that the U.S. Coast Guard did not have to use the G-REX system unless it was relying on GSA-delegated leasing authority. Additional reservations arose about the U.S. Coast Guard's ability to lease certain properties without submitting to the Lease Prospectus Process, a GSA program that involves obtaining congressional approval of leases that meet certain criteria such as lease cost thresholds of \$4 million.

CG-LGL worked closely with the Coast Guard Housing Program to draft a delegation package for previously unused family housing authorities in 10 USC §§ 2835, 2835a, and 2836, which will provide the Coast Guard authority to construct and enter into long term leases for family housing. CG-LGL also provided legal review of a novel lease agreement authorizing the use of DoD privatized military housing on Joint Base Anacostia Bolling for the hosting of official DHS and USCG meetings and events on an extremely tight timeline.

Administrative Law

The Administrative Law Group (ALG) worked extensively with colleagues within the Department of Homeland Security and Coast Guard programs to respond to a 300% increase in Board of Corrections for Military Records cases. ALG attorneys assisted offices throughout the Coast Guard with implementing policy changes resulting from the Presidential Transition, including proposals and delegation memoranda that will continue to enhance the ability of the Coast Guard to carry out its missions and increase efficiency. Attorneys also handle a legal travel docket that is instrumental in facilitating flag officer and Senior Executive Service official travel. Attorneys reviewed over 1,000 Coast Guard-wide policy and messaging documents for legal sufficiency and served as legal advisor on numerous high level Mishap Analysis Board investigations.

Ethics

Coast Guard Oceania District. Oceania District attorneys provided ethics advice and support on over 65 cases over the past year. Many of these engagements such as port visits, vessel christenings, and military receptions were hosted or attended by foreign partners from Japan, Korea, New Zealand, Singapore, and Australia, and held across Oceania. Oceania District attorneys played a key role in advising command on the appropriateness of attendance at foreign hosted events, ensuring compliance with ethics rules related to official capacity, gift acceptance, and foreign relations.

Atlantic Area. Atlantic Area attorneys maintained a comprehensive ethics portfolio, providing over 160 ethics determinations to the Atlantic Area Commander, Deputy Commander, senior Commanding Officers and other LANTAREA units and personnel. Atlantic Area ethics officials advised on various diplomatic, public and private gatherings, gift acceptances, post-government employment, and confidential financial reviews.

As the legal advisor to Coast Guard Cutter *Eagle*, Atlantic Area attorneys provided expert legal advice to meet the ship's unique mission set of officer training, public affairs, and external engagement. Area attorneys provided legal advice regarding the ship's Satellite Exchange Agreement with Coast Guard Community Service Command, completed a review of its Morale authorization to host receptions, and restored *Eagle's* partnership with Tall Ships America. Attorney assistance enabled *Eagle* to conduct external engagements with key domestic and international partners in port visits around the globe.



Figure 14: The U.S. Coast Guard Cutter Barque Eagle (WIX-327) enters the port of Seattle as part of its summer cruise, July 9, 2025.

Hearing Office

CG-094H: The Coast Guard Hearing Office is within the CG-JAG directorate located at Coast Guard Headquarters, Washington, DC. The office is staffed with a senior attorney Office Chief, two Hearing Officers, and three administrative support specialists.

Mission. The mission of the Hearing Office is to adjudicate civil penalty cases in accordance with the Commandant's maritime safety and security strategy to compel compliance with federal laws and regulations as well as to deter violations in the maritime domain. Civil penalty cases involve the full spectrum of the marine transportation system (commercial vessel operations, shore-side facility operations, and recreational boating). The civil penalty process is remedial in nature and is administered in accordance with 33 CFR Subpart 1.07 and Coast Guard policy.

Transparency. The Coast Guard Hearing Office maintains a public-facing website, <https://www.uscg.mil/Resources/legal/CGHO/>, designed to help parties who have been charged with a violation, by providing information that may assist them in making informed decisions regarding their civil penalty case. The content of the website includes Civil Penalty Appeal Decisions, annual reports on Civil Penalty Case Outcomes, articles on issues involving civil penalties, Civil Penalty options, FAQs, and much more.

Snapshot of the past 5 years:

Calendar Year	Total violations logged	Total sum of civil penalties
2020	1097	\$ 1,293,056
2021	981	\$ 1,004,358
2022	1035	\$ 1,169,065
2023	965	\$ 790,695
2024	422	\$ 518,108

**For CY24, the data does not reflect the entire CY24 data because it is the date of violation that determines the starting point for each case. On average, there is a 4 - 6 month lag from when the CGHO receives cases from field units. Consequently, the complete data for CY24 will not be available until mid to late 2025.*

Legal Assistance, Defense Services, & Member Advocacy

Legal Assistance

From April 2024 to March 2025, 15 civilian and active-duty legal assistance attorneys provided counsel to over 4,200 clients, helping them with estate planning, family law, consumer law, and numerous other civil law issues. Recent changes in the law, particularly in the areas of assisting victims of domestic violence and base housing tenant issues, have had an impact on the Coast Guard Legal Assistance practice and the type of cases addressed by the legal assistance attorneys.

CGJAG Standard Operating Procedure 17B requires that first-tour Coast Guard Judge Advocates represent legal assistance clients regarding one estate planning and one non-estate planning issue to help them gain confidence and proficiency early in their careers. While they always do outstanding work, these young attorneys enjoyed considerable success this year. One judge advocate's expert advocacy led to an acknowledgement by a CN tax authority that the client did not owe property tax and triggered a review of how they assess tax against military members. Another new attorney's advocacy led to a successfully negotiated termination of a residential lease and saved the client about \$4,000. Yet a third judge advocate persuaded Maryland officials to change its interpretation of professional license portability in a manner more favorable to members and spouses.

The Coast Guard Arctic District was the winner of the ABA LAMP Distinguished Service award this year. While their area of responsibility comprises only one state—Alaska—that one state covers an area greater than one-half the contiguous United States. The tyranny of distance, coupled with harsh climate, remote duty stations, and limited transportation infrastructure, make the provision of legal assistance, including essential training for members and dependents, difficult, if not cost prohibitive. Many otherwise routine issues, such as housing and landlord-tenant relationships, are aggravated or amplified simply because of the inaccessibility, the lack of practical alternatives, and small community dynamics. Against that backdrop, the Arctic District legal assistance team leveraged technology, training, and personal dedication to vastly expand the provision of legal assistance to all corners of Alaska. First, the legal assistance team diligently trained, certified, and supervised a cadre of more than seventeen Title 10 notaries at local units, including deployable cutters. Regular online training of general legal readiness topics such as SCRA, Taxes, Legal Readiness, and Estate Planning were complemented by Alaska-specific topics, including Alaska residency requirements, the Alaska Permanent Fund Dividend, and state landlord-tenant law. Additionally, the legal assistance team successfully addressed unique Permanent Change of Station issues related to an overseas assignment for incoming and departing members, with a literal worldwide audience.



Defense Services

The Defense Services Division is responsible for providing defense counsel, representation, and consultation across the Coast Guard to members facing courts-martial and adverse administrative proceedings. This Division manages the Coast Guard and Navy Memorandum of Understanding on Mutual Support in Military Justice Matters. Through the cross-service agreement, in 2024, the Defense Services Division coordinated representation for 14 Coast Guard members facing courts-martial and 36 members facing administrative separation hearings. Currently, the Coast Guard has eight judge advocates embedded in six Navy Defense Service Offices throughout the country. These Coast Guard judge advocates provided legal advice to over 500 service members in the Coast Guard and Navy and represented clients at over 80 courts-martial and over 75 administrative separation hearings.

Additionally, there are two judge advocate appellate defense counsel who provide legal advice and representation at the appellate level alongside the Navy and Marine Corps Appellate Defense Division. Over the last year, the Coast Guard's Appellate Defense Counsel represented 16 members before the Coast Guard Clemency Board, Coast Guard Court of Criminal Appeals and the Court of Appeals for the Armed Forces.

Member Advocacy

The Office of Member Advocacy is responsible for the Special Victims' Counsel Program and oversees Disability Evaluation System counsel.

Special Victims' Counsel (SVC) Program. With approximately 195 active cases across the United States, the SVC Program continues to provide top quality legal advice and representation to active-duty members, reservists, dependents, and civilian victims of sexual assault and domestic violence. Special Victims' Counsel represent their clients throughout the military justice process, including during interviews, hearings, trial, and appellate proceedings. This year the Coast Guard gave victims the right to be present at administrative separation boards related to their case and SVCs now assist clients prepare for these proceedings.

The Coast Guard has fourteen full-time SVCs at seven nation-wide locations: Miami, FL; Seattle, WA; Alameda, CA; Cleveland, OH; Washington, DC; Norfolk, VA and the CG Academy in New London, CT. The Norfolk office opened in April 2025 and brings SVC closer to their client base in this area with a high concentration of military members.

Disability Evaluation System Attorneys. Member Advocacy Division attorneys also represent ill and injured Coast Guard members throughout every stage of the Service's Disability Evaluation System (DES) process, representing the individual (rather than the Coast Guard) as they either medically separate or return to duty. This past year, five primary disability attorneys and four collateral duty disability attorneys represented over 400 Coast Guard members facing disability evaluation and possible medical separation or retirement. DES attorneys help clients make informed decisions that will have dramatic effects on the members' careers and financial



interests. Attorneys advocate for their clients before the Informal and Formal Physical Evaluation Boards (PEBs) and in the earlier stages of the Medical Evaluation Board (MEB) process, ensuring that members are afforded their right to due process, and that the Coast Guard's actions comply with applicable federal statutes and Department of Veterans Affairs (VA) regulations.

The Coast Guard continues to work towards fully transitioning to the Integrated Disability Evaluation System (IDES), having completed "IDES Pilot 2.0" under the supervision of the Veteran's Administration. The Coast Guard Personnel Service Center (PSC) has now transitioned the majority of its medical clinics to IDES and is on track for full implementation by the end of this year. Member Advocacy Division attorneys are working closely with PSC to help guide the service through this transition, with the twin goals of reducing the total amount of time that a member is in the DES and providing the member with a clear picture of their Coast Guard and VA disability compensation before separation from the service. Both PSC and the Office of Member Advocacy attorneys are fully committed to improving the process for the members undergoing evaluation.



Maritime and International Law

As the nation's only armed force with domestic law-enforcement authority, the Coast Guard leads maritime federal law for drug interdiction, illegal migrant interdiction, marine environmental protection, marine safety, fisheries, maritime security, and general federal laws applicable at sea. The Office of Maritime and International Law (CG-LMI) at Coast Guard Headquarters plays a prominent role in the development and implementation of national Coast Guard policy in these areas, and in providing real-time advice to Coast Guard operational commanders. The Office of Maritime and International Law also leads Coast Guard efforts in the international legal community as a fully participating member of the U.S. delegation to the International Maritime Organization and other international bodies that have purview in the maritime domain.

The Office Maritime and International Law (CG-LMI)

International Maritime Organization (IMO). The IMO is a United Nations specialized agency that is headquartered in London, United Kingdom. It is responsible for the safety and security of shipping and the prevention of marine and atmospheric pollution by ships. Coast Guard attorneys serve as advisors or representatives of the United States at meetings of various IMO committees such as: the Maritime Safety Committee; the Marine Environment Protection Committee; the Legal Committee; the Subcommittee on Implementation of IMO Instruments; the Subcommittee on Pollution Prevention and Response; the Subcommittee on Human Element Training and Watchkeeping; the Subcommittee on Navigation, Communications and Search and Rescue; and the Subcommittee on Ship Design and Construction and the Meeting of Contracting Parties to the London Convention and London Protocol.

CG-LMI served as counsel to the U.S. delegation for the 82nd meeting of the IMO's Marine Environment Protection Committee (MEPC). The Committee adopted amendments to the International Convention for the Prevention of Pollution from Ships (MARPOL) Annex VI for the designation of two Emission Control Areas, one in Canadian Arctic Waters and a second in the Norwegian Sea. The Committee also adopted guidance on the type approval process for ballast water management systems. Lastly, the Committee approved both the action plan and the revised guidelines for the reduction of underwater radiated noise from commercial shipping..

The Office served as counsel to the U.S. delegation for the 109th meeting of the IMO's Maritime Safety Committee. The Committee, among other things, has been actively working to develop a non-mandatory safety code for Maritime Autonomous Surface Ship (MASS). This effort to develop a set of common terms, principles and functional requirements for commercial cargo vessels that employ autonomous and remotely operated technologies is ongoing and involves the efforts of numerous delegations from across the globe. The Committee revised its target to May 2026 for the completion of the voluntary MASS Code.

CG-LMI served as counsel to the U.S. delegation for the eleventh meeting of the IMO's Sub-Committee on Ship Design and Construction (SDC). The Sub-Committee finalized draft guidelines for emergency towing arrangements for ships other than tankers to be submitted to the IMO's Maritime Safety Committee for approval. The Sub-Committee also finalized draft amendments to the International Code on the Enhanced Programme of Inspections During Surveys of Bulk Carriers and Oil Tankers (2011 ESP Code) relating to remote inspection techniques. The Sub-Committee developed revisions to the interim explanatory notes for the Safe Return to Port regulations for passenger ships.

CG-LMI served as counsel to the U.S. delegation for the eleventh meeting of the IMO's Sub-Committee on Ship Systems and Equipment (SSE). Among other things, the Sub-Committee finalized draft amendments to the Life-Saving Appliances Code and associated instruments on design and prototype test requirements for the arrangements used in simulated launching of



Figure 15: LT Howard Thorne, Staff Attorney in the Office of Maritime and International Law, serving as a legal advisor to the U.S. delegation to the International Maritime Organization's Sub-Committee on Ship Systems and Equipment in London, UK.

free-fall lifeboats; finalized a revision of the code of practice for atmospheric oil mist detectors (MSC/Circ.1086); and validated its Model Course "Survey of Fire Appliances and Provisions."

IMO Legal Committee: The Chief of the Office of Maritime and International Law serves as the Head of the U.S. delegation to the 112th Meeting of the Legal Committee. Issues addressed by the committee includes the fair treatment of seafarers when detained on suspicion of committing alleged crimes and provisions of financial security in case of abandonment. A new output addressing substandard

shipping practices by "dark fleet" ship was adopted. Additionally, the committee continues to consider measures to address Maritime Autonomous Surface Ships (MASS) in instruments under the purview of the Committee, measures to prevent unlawful practices associated with the fraudulent registration and fraudulent registries of ships and liability and compensations regimes associated with vessel operations. Coast Guard attorneys work with legal advisors from the Dept of State and Dept of Defense to represent U.S. interests in all the above matters. Finally, issues associated with the Russian/Ukraine conflict continue to be discussed in the Committee.

International Labour Organization (ILO). The ILO develops labor standards and has a special section devoted to the maritime sector. The primary instrument is the Maritime Labour Convention, 2006 (MLC). Although not a party to the MLC, the U.S. is active in ensuring the convention is applied with fairness to all seafarers and vessels, most recently working with other countries with respect to amendments that will develop international standards to prevent sexual assault and sexual harassment (SASH) on board ships. The ILO's focus overlaps with IMO with respect to SASH, fair treatment of seafarers and concerns with minimum hours of rest/maximum hours of work for all those working aboard seagoing ships. Coast Guard attorneys work with legal advisors from the Department of Labor, which is the lead agency at ILO, as well as the Department of State. The Office of Maritime and International Law regularly serves as a legal adviser on the U.S. delegations to these joint ILO/IMO meetings.

Support to Foreign Nations.

The Coast Guard supports the development of the legal framework of other countries through Model Maritime Service Code engagements and other training events. Coast Guard attorneys provide support to several nations including El Salvador, Costa Rica, Mexico, Malaysia, and Indonesia, among others, in the development of legal authorities for their maritime law enforcement agencies. During these engagements,

Coast Guard attorneys identify gaps in existing authorities and assist in drafting legislation, regulations, and policy needed to execute their desired missions. USCG attorneys developed and led training events for foreign Coast Guard officers regarding maritime domain awareness, implementation of whole of government communications, and the implementation of IMO instruments designed to mitigate cyber risk to waterfront facilities and vessels. U.S. Coast Guard attorneys also assist other nations' prosecutions by facilitating the testimony of Coast Guard law enforcement officers during criminal trials.

Coast Guard attorneys across the country coordinate Coast Guard responses to requests from foreign partners to support prosecutions by foreign partners pursuant to Mutual Legal Assistance Treaties. This support most often occurs in preparing Coast Guard witnesses and transmitting evidence from Coast Guard boarding operations in support of counter drug and transnational organized crime prosecutions in foreign courts.



Figure 16: CDR Travis Noyes (second from left) participates in a panel discussion with prosecutors and law enforcement officers from the United States and El Salvador during a joint seminar on maritime narcotics interdictions in San Salvador, El Salvador, September 2024.

Arctic Developments. Coast Guard attorneys are actively engaged in issues involving the expansion of commercial maritime transportation along the Arctic border. As part of the United States delegation to the Arctic Council, Coast Guard attorneys advised Coast Guard leadership on Law of the Sea matters. These issues included matters concerning emerging shipping areas, as well as the Arctic Council's Protection of the Arctic Marine Environment (PAME) Working Group initiatives, including implementation of the Arctic Marine Shipping Assessment and review/advice for the Arctic Ocean Review and the Emergency Prevention Preparedness and Response (EPPR) Working Group initiatives.

District Legal Office International Activity Support. Dedicated to developing solutions to combat illicit maritime activities, attorneys from Coast Guard Heartland based in New Orleans, LA, Coast Guard Southwest based in Alameda, CA, and Coast Guard Headquarters in Washington, D.C. serve on the legal and policy working group for the North American Maritime Security Initiative, working with Mexican and Canadian counterparts to successfully execute joint exercises and foster further partnership engagements.

CGJAGs at Army Center for Law and Military Operations. CGJAGs are assigned to the Army Center for Law and Military Operations (CLAMO) at the Army JAG Legal Center and School in Charlottesville, VA. This joint service assignment allows Coast Guard attorneys to collaborate with their Army, Navy, Marine, and National Guard counterparts to gain valuable experience in military legal operations. By participating in this program, CGJAGs contribute to advancing the strategic legal interests of the Coast Guard while also fostering inter-service cooperation and knowledge sharing among the different branches of the armed forces. This unique opportunity enhances their legal expertise, promotes joint operational effectiveness, and strengthens the overall capabilities of the Coast Guard in fulfilling its critical mission of safeguarding the nation's maritime interests.

International Activities

Standard Operating Procedures with Samoa. Attorneys from the Office of Maritime and International Law, Pacific Area, and Coast Guard Oceania District developed Standard Operating Procedures (SOP) for United States law enforcement vessels to receive approval from the Government of Samoa to conduct law enforcement activities, including boarding of vessels in its EEZ and on the high seas. This SOP supplements the existing Bilateral Maritime Law Enforcement Agreement and furthers maritime law enforcement operations, maritime domain awareness, and assists with implementation of integrated operations within the Pacific. The SOP was signed on April 5, 2024, by Samoa's Chargé d'Affaires, Noriko Horuichi as the US signatory, and Harry Schuster, Minister of Police signed for Samoa.





Figure 17: CDR Travis Noyes instructs Indonesian Naval and Police officers on the legal foundations of maritime operations and the rule of law during a week-long engagement with between the U.S. Naval War College and the Indonesian Naval Command and Staff College in Jakarta, Indonesia, November 2024.

International Legally Binding Instrument on Plastic Pollution. In March 2022, the United Nations Environment Assembly (UNEA) passed resolution number 5/14 whereby Member States agreed to develop an international legally binding agreement to

address plastic pollution, including in the marine environment. Attorneys from CG-LMI have provided subject matter expertise while serving with other sister agencies on the U.S. delegation to the Intergovernmental Negotiating Committee (INC). To date, the INC has convened for five negotiating sessions, with the next--and possibly final--session “INC 5.2” planned for August 2025 in Geneva, Switzerland. The current draft instrument contains a variety of possible substantive provisions aimed at addressing pollution across the full lifecycle of plastic, including draft text on chemicals and polymers of concern, problematic plastic products, product design, extended producer responsibility, trade, microplastics, waste management, and existing plastic pollution.

Defense Institute of International Legal Studies (DIILS).

CGJAG, working with the Defense Institute of International Legal Studies, deployed over 40 attorneys to more than 29 nations to help support, educate, and improve legal systems and processes in other nations. 19 JAGs were repeat instructors during these engagements. Participating JAGs supporting these endeavors, ranging in rank from O-3 to O-6. The countries traveled to span over four continents; regions visited include: Southeast Asia, South America, Africa, Central America, Europe, and the Caribbean.

Atlantic Area. Atlantic Area attorneys supported U.S. Africa Command’s security cooperation mission by advising on the Africa Maritime Law Enforcement Partnership, where Coast Guard Deployable Specialized Force (DSF) units conducted subject matter expert exchanges with African Partner Nations. Such support included providing legal advice to a joint law enforcement operation with the Seychelles Coast Guard, where a Coast



Figure 18: Coast Guard Southeast District, Miami, FL, attorney LCDR Juan Ramirez supports DIILS mission by providing Maritime Operational Law training during a defense forces workshop in El Salvador.

Guard law enforcement team completed boardings in a week-long surge operation conducted in the east African nation's exclusive economic zone. Atlantic Area JAGs also leveraged new legislation in the Fiscal Year 2024 National Defense Authorization Act, obtaining Secretary of Defense approval for U.S. Africa Command to provide direct support to Coast Guard law enforcement operations.



Figure 19: Atlantic Area attorney LCDR Chris Clifton completed a legal interoperability study with the Islamic Republic of Mauritania, establishing a path towards future U.S. AFRICOM security cooperation activities in the region.

An attorney from Atlantic Area also supported U.S. Africa Command by conducting a legal interoperability study with the nation of Mauritania. The attorney completed a week-long visit to the country and drafted a legal report for use by various U.S. agencies to begin negotiations for a new maritime law enforcement international agreement.

Staff attorneys from Atlantic Area participated in joint planning and operations to enhance collaboration and ensure interoperability between

U.S. and Canadian maritime forces. Attorneys assisted in the planning efforts for Operation Nanook (OP NANOOK) in August 2024, which brought various NATO forces together for exercise operations near Nuuk, Greenland, including maritime interdiction training, gunnery drills, and search and rescue simulations. Atlantic Area attorneys also participated in the Frontier Sentinel exercise in June 2024, which focused on refining operational procedures for defending undersea infrastructure.

Coast Guard Oceania District. As part of the Department of Defense's Indo-Pacific Command Military Operations (MILOPS) 2024, the Staff Judge Advocate for Coast Guard Oceania District played a critical role in integrating U.S. Coast Guard legal expertise into joint operational planning and execution across the Indo-Pacific Region. MILOPS is a recurring multinational and interagency operational planning event designed to synchronize maritime security efforts and reinforce regional partnerships in support of a free and open Indo-Pacific.

The Oceania District attorneys participated in a multinational tabletop exercise with Papua New Guinea aimed at reinforcing a rules-based international order and enhancing partner nation capacity to uphold maritime sovereignty and governance. Through scenario-based discussions, Coast Guard legal advisors provided critical insights on operational law, use of force, and legal frameworks supporting maritime interdictions, enabling Papua New Guinea counterparts to align national procedures with international norms.

Coast Guard East District. Coast Guard attorneys from the Office of Maritime and International Law and the Coast Guard East District led U.S. government negotiations and supported the conclusion of an agreement with the Government of Bermuda to combat illicit maritime activity. This critical cooperation reinforces the close U.S.-Bermuda security partnership by strengthening efforts to combat illegal migration, drug smuggling, and human trafficking, as well as illegal, unreported, and unregulated fishing in Bermuda's territorial waters and Exclusive



Figure 20: Negotiated by the United States, the United Kingdom, and Bermuda, the agreement allows Bermudian law enforcement officers to operate aboard U.S. Coast Guard (USCG) vessels, significantly improving enforcement against illicit activities and illegal fishing.

Economic Zone. Negotiated by the United States, the United Kingdom, and Bermuda, the agreement allows Bermudian law enforcement officers to operate aboard U.S. Coast Guard vessels, significantly improving enforcement against illicit activities and illegal fishing.

Coast Guard Southeast District. Coast Guard attorneys from the Office of Maritime and International Law and the Coast Guard Southeast District worked with their Dutch counterparts to facilitate diplomatic clearance for the novel deployment of armed Coast Guard aircraft from foreign soil. The aircraft will fly in direct support of joint counter-narcotics operations between the Netherlands and the United States throughout the southern Caribbean.

LCDR Juan Ramirez participated in the 2024 Cuba and U.S. Bilateral Coordination Plan Tabletop Exercise, which focused on the Bilateral Coordination Plan between the U.S. and the Republic of Cuba for addressing marine and coastal environmental pollution. The attorney provided legal guidance on the processes to obtain the necessary approval, clearances, waivers, and exemptions from Department of State, Customs and Border Protection, Immigration and Customs Enforcement, and the Departments of Treasury and Commerce for government and commercial vessels to enter Cuban waters to facilitate an effective response to environmental pollution issues.



Figure 21: LCDR Juan Ramirez, a Southeast District attorney, at the 2024 Cuba and U.S. Bilateral Coordination Plan Tabletop Exercise.

Military Justice

Office of Military Justice

This year, the attorneys who advise Coast Guard Investigative Services were moved under the Office of Military Justice. This office develops military justice policy and supports judge advocates in the field. It also works extensively with the Department of Defense and the other Services to develop and execute military justice initiatives.

Additionally, this office oversees the Coast Guard's appellate government counsel. Judge advocates assigned as appellate government counsel brief and argue cases before the Coast Guard Court of Criminal Appeals (CGCCA) and the U.S. Court of Appeals for the Armed Forces (CAAF). Appellate government counsel also works closely with the Air Force Government Appellate Division, Navy-Marine Corps Appellate Government Division, and Army Government Appellate Division. Since October 2023, appellate government counsel handled twenty-three appeals and argued eight of those appeals at oral argument before the CGCCA and CAAF. Notable issues pertained to failure to state an offense, unlawful command influence, court-martial jurisdiction, panel members' deliberations, prosecutorial misconduct, appellate discovery, variance, and Article 31(b), UCMJ, rights.

Joint Service Committee on Military Justice

The Chief of the Office of Military Justice completed its Chairing of the Joint Service Committee (JSC) on Military Justice, passing the Chair to the Marine Corps in January 2025. The JSC has five Voting Group members, representing all the Armed Forces. The JSC's purpose is to advise the President of the United States, through the Office of the General Counsel of the Department of Defense, to ensure the military justice system is comprehensive and current. The Coast Guard's tenure from January 2023 to 2025 was one of the busiest in the Committee's 42-plus year history. Of note, it ushered through two Executive Orders (July 2023 and December 2024) amending the Manual for Courts-Martial pursuant to sweeping legislative amendments to the Uniform Code of Military Justice. This included implementing new special trial counsel authorities, expanding appellate rights, and reforming sentencing procedures. The Committee led the revision of several joint points, most notable the Secretary of Defense's guidance providing factors to determine when to pursue court-martial. It also analyzed the merits of several significant proposals for additional reform at Congressional request, such as requiring unanimous verdicts and overhauling the court-martial panel member ("jury") process.

Office of the Chief Prosecutor

Chief Prosecutor Rear Admiral Bill Dwyer and the Office of the Chief Prosecutor (OCP) serve as the counterparts to Lead Special Trial Counsel (STC) and the Offices of Special Trial Counsel (OSTC) in the other Armed Services. In addition to prosecuting victim-centric "covered offenses," the OCP is responsible for prosecuting all Coast Guard courts-martial. The OCP continues to serve as a cornerstone to the Service's ability to maintain its readiness.

Over the past year, the OCP has continued to enhance the proficiency of its legal support staff and prosecutors. A key addition has been the addition of a prosecution subject matter expert and implementation of a robust training program. The OCP also added additional paralegals and an embedded Senior Special Agent from the Coast Guard Investigative Services. Additionally, the design for the OCP's state-of-the-art, 7,100 sq ft, smart courtroom with adjacent office space for a chambers, members, venire, prosecution team, defense team, witnesses, and Special Victims' Counsel was completed.

Training and partnership developments were also a major theme throughout the year. The OCP hosted its Department of Defense counterparts for collaborative training and exchange of best practices, joined the Navy and Marine Corps for a Sea Services Prosecution Symposium; established agency and service-level agreements with CGIS, the Federal Law Enforcement Training Center, and Base Charleston; and hosted a week-long training event alongside the Service's Special Victims' Counsel. All of these engagements and agreements ensured the OCP has the organic proficiency and partner support necessary to execute its critical mission.

On a global level, the OCP contributed to an International Judge Advocate General Conference hosted by the Judge Advocate General Australian Defence Force, with participation from representatives of Australia, Canada, the United Kingdom, New Zealand, Fiji, Singapore, Indonesia, and the United States (each U.S. military service was represented by its respective OCP/OSTC). Discussions focused on sharing experiences, recent developments, and addressing challenges in modern military justice systems, particularly in the investigation and prosecution of victim-centric offenses, while also fostering valuable international collaboration and professional relationships.



Finally, the OCP also strengthened its local partnership with the Charleston School of Law by providing judges and members (jurors) for the law school's inaugural mock court-martial competition. The competition supported participating law schools from around the country and served not just to improve future attorneys' litigation skills but also to showcase the Coast Guard legal program as an employer of choice. As a direct outcome of that partnership, the OCP was able to expand its internship program with the law schools, employing 25 interns throughout the year.

Figure 22: The OCP's strong relationship with the Charleston School of Law has resulted in several Charleston Law graduates joining the ranks of CGJAG, including Miss. Sarah Cooper (right) seen here with RDML Dwyer.

COURTS-MARTIAL (BY FISCAL YEAR)						
	2025	2024	2023	2022	2021	2020
General Courts-Martial	3	5	11	6	11	4
Special Courts-Martial	5	3	7	7	17	8
Summary Courts-Martial	1	1	2	5	7	12
Total Courts-Martial	9	9	20	18	35	24

Atlantic Area. In 2024, Atlantic Area attorneys advised on approximately 488 criminal and administrative investigations requiring over 50 nonjudicial punishment proceedings. These investigations included standard administrative inquiries as well as the Coast Guard Investigation Service, line of duty, claims, civil rights, harassment, Office of the Inspector General, and major incident investigations.

Atlantic Area attorneys advised commands and provided commander input on approximately 41 covered offenses with OCP preferring on three cases. In *U.S. v. SN Perryman*, Area attorneys advised commands through a complex domestic violence matter requiring pre-trial restraint and pre-trial confinement. Ultimately, a pretrial agreement was reached wherein the member plead guilty to six charges, including Article 128b, at a Special Court-Martial. The military judge sentenced then-SN Perryman to reduction to E-1 and 135 days of confinement.



Prevention Law

The prevention law team is responsible for supporting commands in the prevention of personnel casualties and property losses, minimizing security risks, and protecting the marine environment. These attorneys also work with policymakers to support international and domestic legal frameworks for preventing, preparing, and responding to incidents.

Vessel Safety. Coast Guard attorneys assist with the development and implementation of vessel safety standards. Coast Guard attorneys advise the Coast Guard's Assistant Commandant for Prevention Policy, which develops and maintains policy, standards, and program alignment for the prevention activities of the Coast Guard to achieve Marine Safety, Security, and Stewardship mission success. Coast Guard attorneys also work with state recreational boating safety liaisons to ensure states follow federal law. With respect to passenger vessel inspection and licensing requirements, many legal offices work closely with Coast Guard Investigative Service (CGIS), state Departments of Natural Resources, and United States Attorney's Offices to hold individuals and entities accountable for conducting illegal passenger charters.

Illegal Passenger Operations. Coast Guard Captains of the Port (COTPs) and Officers in Charge Marine Inspection (OCMIs) regulate large numbers of uninspected and small passenger vessels. Some vessel operators attempt to avoid regulatory oversight by exploiting statutory exceptions.

Mariner Credentialing and Manning Issues. There are approximately 200,000 active holders of Merchant Mariner Credentials (MMCs) issued by the Coast Guard. Coast Guard attorneys actively assist numerous program elements in establishing and modifying the procedures and policies regarding the qualification for and issuance of merchant mariner credentials. Their advice and support help develop standards required by those serving aboard U.S. documented vessels. Recently, attorneys provided guidance to the Mariner Credentialing Program (MCP) on the impact on the drug testing program of the Department of Justice proposal to reschedule marijuana from Schedule I to Schedule III controlled substance under the Controlled Substances Act (CSA).

Prevention attorneys provided guidance and legal support to several rulemaking projects designed to modernize the Mariner Credentialing Program. These projects included a revision of the regulations to facilitate the program's implementation of NAVITA.™ NAVITA™ is the primary initiative of the MCP Transformation to replace the outdated and inefficient Merchant Mariner Licensing and Documentation (MMLD) database used by the National Maritime Center (NMC) to issue MMCs and mariner Medical Certificates. Other regulatory projects have provided for direct submission of documentation from training providers, lessening the opportunity for fraud and reducing the administrative burden for both mariners and the Coast Guard with respect to documentation of training requirements. An additional rulemaking project supported our Military to Mariner efforts by issuing regulations to make permanent the waiver of merchant mariner credentialing fees for certain uniformed services personnel. Prevention law attorneys

support the MCP in planning for and developing policies related to new technologies such as autonomous vessels a wing-in-ground craft.

Sexual Assault / Sexual Harassment. The 2023 National Defense Authorization Act (NDAA) enacted several new legislative tools for the Coast Guard to combat sexual assault and sexual harassment (SASH) in the maritime industry. The Coast Guard continues to provide guidance to the maritime transportation industry and admiralty lawyers on the impact of these changes and means of compliance. CGIS and the Suspension & Revocation National Center of Expertise (S&R NCOE) investigate reports of SASH to determine what S&R action is appropriate. Since January 2023, the Coast Guard has received over 350 reports of SASH for potential S&R action, which include reports from the Transportation Security Administration that include underlying SASH offenses, SASH convictions that would prevent the issuance of a credential, and harassment.

Suspension and Revocation (S&R). As the regulatory agency responsible for issuing merchant mariner credentials and licensing, Coast Guard attorneys work to ensure the integrity of that program to safeguard our maritime transportation system. When the Coast Guard learns that an MMC holder has committed an offense that would warrant suspension or revocation of his or her MMC, an administrative enforcement proceeding conducted under 46 C.F.R. part 5 and 33 C.F.R. part 20 may be initiated.

Attorneys advise USCG licensing professionals on a multitude of events that could trigger S&R processing including drug use; security risks; sexual assault or sexual harassment; convictions covered by the National Driver Register Act; and other criminal convictions, misconduct, negligence,

and professional or medical incompetence. During the investigation of an S&R offense, Coast Guard attorneys advise Investigating Officers (IOs) regarding the collection of evidence, parameters for witness interviews, and communication with attorneys representing parties or witnesses. Approximately 600 S&R Complaints are issued each year, and every Complaint is reviewed by a Coast Guard attorney for legal sufficiency before it is filed. If a mariner that is subject to an S&R proceeding requests a hearing before an administrative law judge, a Coast Guard attorney represents the agency throughout the process.

Suspension and Revocation (S&R) Historical and Predicted Enforcement Activity			
CY	Docketed Cases	Hearings	Appeals
2020	357	6	8
2021	817	14	4
2022	532	7	5
2023	487	11	0
2024	608	7	59
2025 (YTD)	260	8	46

Cyber Risk in the Maritime Community. Coast Guard attorneys continue to support the Coast Guard's effort to develop policy, standards, and regulations for addressing cyber risks in the maritime community. The Coast Guard published guidance to assist facilities regulated under

the Maritime Transportation Security Act with implementing cyber security measures that will meet existing facility security plan requirements. Coast Guard attorneys also participated in multiple interagency cyber incident response exercises, assisting in a whole of government approach to cybersecurity that involves both state and federal agencies. The Office of Maritime and International Law (CG-LMI), in collaboration with the Office of Regulations and Administrative Law (CG-LRA), the Office of Information and Intelligence Law (CG-LII), and Coast Guard Cyber Command attorneys supported Coast Guard Program Offices with several significant initiatives. These efforts culminated in notable achievements, including: (1) the release of the Cybersecurity in the Marine Transportation System Final Rule; and (2) an update to the previously issued cyber-focused Maritime Security Directive mandating cyber risk management measures for owners and operators of ship-to-shore cranes manufactured by the People's Republic of China.

National Vessel Documentation. A Coast Guard attorney with LMI-P and embedded with the National Vessel Documentation Center (NVDC) provides on-site guidance regarding the appropriate federal documentation required to commercially and recreationally operate vessels under U.S. flag status. Vessel documentation issued by the NVDC provides conclusive evidence of nationality for international purposes; provides for unhindered commerce between the states; and admits vessels to certain restricted trades, such as coastwise trade and fisheries. The attorney liaises with Coast Guard military and civilian personnel, as well as other federal and state agencies, on matters such as citizenship, U.S. build, and foreign rebuild determinations, vessel ownership changes, FOIA requests, Congressional inquiries, fraudulent documentation investigations, federal criminal and civil proceedings, and other vessel documentation-related matters.

Space Operations. Increased space operations in Coast Guard Southeast District, based in Miami, Florida, continue to pose complex challenges to the Coast Guard. In the last several years, space operations in the U.S. have increased tremendously. Pursuant to a 5-year pilot program, authorized by the National Defense Authorization Act of 2023 (Pub. L. 117-263), the Coast Guard has been overseeing at-sea rocket recovery operations. These operations involve dynamically positioned vessels which serve as the rocket recovery platform. Coast Guard attorneys have been supporting the Coast Guard headquarters staff on the implementation of the pilot program. As a result of the pilot program the Coast Guard garners critical data on the unique design, operational and regulatory challenges posed by these space operations. This data will be relayed in a report to Congress at the conclusion of the pilot. Coast Guard attorneys, in conjunction with Rand Corporation, the Department of Defense, and U.S. Space Command participated in a workshop developing the Commandant's strategy on space operations.

Autonomous and Remote Technology

Coast Guard attorneys advise the Coast Guard Automated and Autonomous Vessel Policy Council (AutoPoCo). The AutoPoCo coordinates across offices on the operation of remotely operated and autonomous vessels in United States waters and the development of related emerging technology. The AutoPoCo serves as the touchpoint for Headquarters' external

engagement on these issues. It reviews and responds to comments and concerns from other Government stakeholders and industry partners.

Coast Guard Great Lakes District. Great Lakes attorneys assisted Sector Detroit's response to the first public autonomous vessel collision with a recreational vessel on the Great Lakes, resulting in estimated damages to the public vessel exceeding one million dollars. District legal staff worked quickly with Sector Detroit and Great Lakes District staff to coordinate the initial response with other governmental agencies including NOAA, the Department of Commerce, and the National Transportation Safety Board. Great Lakes attorneys supported a subsequent investigation and queries from NOAA and Department of Energy counsel in advance of potential civil litigation between the government and private parties.

Marine Casualties & Investigations

Coast Guard attorneys provide support for marine incidents investigations, including working closely with counterparts at the National Transportation Safety Board (NTSB) on casualties and initiatives. The Marine Board of Investigation (MBI) is the highest level of marine casualty investigation, convened by the Commandant. The purpose of these investigations is to determine the cause of the incident and provide safety recommendations to prevent similar casualties. Coast Guard attorneys act as legal advisors for the investigators.

Submersible Vessel TITAN. Coast Guard attorneys continue to provide legal counsel and investigatory assistance to the MBI investigating the complete loss of the TITAN and its five occupants in the Atlantic Ocean off the coast of St. John's, Newfoundland, Canada on June 18, 2023. After an extensive search and rescue effort, the wreckage of the TITAN was found on the ocean floor approximately 500 meters off the bow of the RMS TITANIC. The MBI held its public hearing on September 16-27, 2024, and Coast Guard attorneys served as both MBI Legal Advisor and Agency Counsel in support of the testifying Coast Guard witnesses.



Figure 23 LCDR Lars Okmark served as Legal Advisor to the TITAN MBI at the Public Hearing in Charleston, South Carolina.

M/V DALI. On March 26, 2024, the M/V DALI, a Singapore-flagged containership, lost power, propulsion, and steering while transiting the Patapsco River, leading to an allision with the Francis Scott Key Bridge in Baltimore, Maryland. The impact caused three spans to collapse, causing one span to block the navigable channel. Tragically, seven construction workers fell into

the water, resulting in six fatalities. Coast Guard lawyers are supporting a Department of Justice criminal investigation into the incident



Figure 24: The Commandant of the Coast Guard, Governor of Maryland, and Mayor of Baltimore, transit by Coast Guard boat to assess the Francis Scott Key Bridge collapse in Baltimore, Maryland, March 29, 2024.

Coast Guard East District. The Coast Guard East District legal office completed three novel surety agreements in support of Department of Justice (DoJ) criminal cases regarding the M/V DALI and their allision with the Francis Scott Key Bridge and the sistership the M/V MAERSK SALTORO. Both the M/V DALI and the M/V SALTORO violated the Ports and Waterways Safety Act. The East District secured \$6 million in surety prior to the departure of both vessels from the ports of the U.S. After the allision with the Francis Scott Key Bridge, the East District received evidence from DoJ that M/V DALI violated the PWSA. Specifically, the M/V DALI failed to report a hazardous condition under 33 CFR 160.216 on eight occasions from September 2023 to March 2024. The East District team negotiated a \$3 million security agreement with the owner and operator of the vessel that was finalized on 18 June 2024. The agreement ensured 11 of the 21 crew members onboard the M/V DALI during the allision with the Francis Scott Key Bridge remained within the U.S. to support DoJ's investigation. In September 2024, the East District team finalized an Addendum to an Agreement on Security for M/V DALI. The Addendum added Synergy Maritime as a party to the agreement because the company directly supervised the M/V DALI's management, binding them to provisions in the original Security Agreement with Synergy Marine. Provisions related to Synergy Maritime accepting service of subpoenas for the DoJ case were of

particular importance. After coming to an agreement and posting a \$3 million security agreement, M/V DALI departed the Sector Virginia on 19 September 2024. Additionally, the Sector Maryland-NCR Commander received evidence from DoJ that M/V MAERSK SALTORO violated the Ports and Waterways Safety Act. Specifically, they also failed to report a hazardous condition under 33 CFR 160.216 on over 30 occasions from February 2021 to March 2024. The M/V MAERSK SALTORO is the sister ship to the M/V DALI that was operating in the same hazardous condition. The Sector Commander exercised his authority under Ports and Waterways Safety Act to have Customs and Border Protection withhold vessel's departure clearance until a \$3 million security agreement was negotiated with the owner and operator of the vessel that was finalized on 25 September 2024. The agreement ensured that the Chief Engineer remained within the U.S. to support DoJ's investigation.

Coast Guard Arctic District. Coast Guard attorneys from the Arctic District continue to support the formal Marine Casualty Investigation into the sinking of the F/V WINDWALKER near Juneau, AK in December 2024, resulting in the loss of all five crew members. Coordinating with the Office of Maritime and International Law—Environmental Law, Arctic District attorneys have provided agency counsel support, facilitating more than 40 interviews and the collection of evidence in the ongoing effort to determine the cause of the accident.

Strategic Sealift Support

Coast Guard attorneys advised the Assistant Commandant for Prevention Policy on legal avenues by which strategic sealift efforts could be significantly augmented. This advice focused on increasing the number of vessels eligible for: Ready Reserve Force recapitalization efforts, Maritime Security Programs, Voluntary Intermodal Sealift Agreements, and Voluntary Tanker Agreement Programs. As a result, the United States has significantly expanded the number of vessels reflagging into the U.S. registry. These efforts have also increased the number of available jobs for U.S. mariners.

Coast Guard East District. The SS UNITED STATES is a deteriorating 990-foot ocean liner, permanently moored in Philadelphia in 1996. The SS UNITED STATES was sold to Okaloosa County on 12 October 2024. The county contracted to tow the vessel from Philadelphia, PA to Mobile, AL, where the ship will be prepared for sinking as part of a recreational diving reef off the coast of Destin, FL. Sector Delaware Bay issued two Captain of the Port orders on 21 October and 15 November 2024, requiring that the vessel satisfy certain safety requirements prior to departure. Coast Guard attorneys from the East District, Atlantic Area, and the Office of Maritime and International Law provided advice on Captain of the Port order requirements and authorities ensuring the safety the waterway and its users during this historic transit.



Figure 25: The crew of U.S. Coast Guard Cutter Resolute (WMEC 620) conducts passing arrangements with the SS United States off Key West, Florida during the retired ocean liner's transit from Philadelphia to Mobile, Alabama, Feb. 27, 2025.

Coast Guard Southeast District. A Coast Guard attorney in the Southeast District provided legal advice on the criminal referral of the M/V MICHIGAN VII. On June 5, 2024, Sector Charleston was notified by a pilot that the vessel was increasing speed uncontrollably while outbound from the Port of Charleston. A subsequent investigation determined that the main engine governor linkage had become disconnected, rendering propulsion control inoperable. The resulting wake injured two boaters, caused property damage exceeding \$500,000, and prompted a temporary shutdown of the Arthur Ravenel Jr. Bridge. The post-casualty examination revealed that the crew had been manually adjusting the governor linkage due to delayed engine response, and this condition was likely known to the company. Despite the known risk, no report was made to the Coast Guard as required under 33 C.F.R. § 160.216, violating 46 U.S.C. § 70034, subjecting the vessel and company to criminal penalties under 46 U.S.C. § 70036. The vessel operated with this known hazardous condition across five Captain of the Port zones over 12 days without notice to authorities. Further, the crew's repeated manual modifications to inoperable machinery without proper correction constituted negligent and potentially grossly negligent operation under 46 U.S.C. § 2302(a) and (b). The Southeast District referred the case for both criminal prosecution and judicial civil penalties for knowing violations of the Ports and Waterways Safety Act and vessel operation safety laws. The Coast Guard attorney secured the presence of 13 witnesses and a \$3.5 million surety bond to ensure compliance and protect future prosecution efforts

Regulations and Administrative Law

The Coast Guard is charged with developing and enforcing regulations to ensure the safety of marine navigation, protect the environment, conduct search and rescue, enforce laws and treaties, and maintain marine security. Coast Guard attorneys draft new regulations based on those mandates and provide advice to field commanders on the implementation of all existing regulations and their enforcement and applicability. The Office of Regulations and Administrative Law (LRA) manages the Coast Guard regulatory agenda; oversees regulatory initiatives; works with attorneys supporting district local field regulations; provides advice about the Federal Advisory Committee Act (FACA); and responds to rulemaking-related recommendations and complaints filed by the public.

Rulemaking. The Coast Guard's rulemaking program continues to balance a portfolio of regulations touching on a wide variety of the 11 Coast Guard missions. Since last year's Coast Guard's Report to the American Bar Association, Coast Guard Headquarters published several rules and proposed rules, as well as more than 100 notices to comply with a variety of legal requirements such as the Paperwork Reduction Act and FACA. Additionally, Coast Guard field units, including Sectors and Districts, drafted routine-and-frequent field regulations that affect only localized areas. During this period, the Coast Guard published over 400 field regulations, including proposed rules, final rules, and notifications of enforcement. In addition, the Coast Guard issued over 100 additional temporary field regulations for safety zones, security zones, or special local regulations that could not be published before their effective period ended.

Last year, attorneys from the Office of Regulations and Administrative Law visited the legal offices of the Heartland and Southwest Districts, as well as several sector Waterways Management offices to provide field regulation drafting training.

The Coast Guard continued engaging in an extensive review of its regulations, guidance documents, and collections of information. The Coast Guard's current portfolio of rulemakings in development is published in the Unified Agenda available at <https://reginfo.gov> within the Department of Homeland Security portfolio.



Figure 26: Below is a picture of attorneys Ms. Kate Sergeant and Ms. Hillary Hunnings during their training session at Sector San Diego.

Notable Rulemakings

Cybersecurity in the Marine Transportation System Final Rule. On January 17, 2025, the Coast Guard published the final rule entitled, "Cybersecurity in the Marine Transportation System" in the Federal Register. The rule updates the Coast Guard's maritime security regulations by establishing minimum cybersecurity requirements for U.S.-flagged vessels, Outer Continental Shelf facilities, and facilities subject to the Maritime Transportation Security Act of

2002 regulations. The rule adds minimum cybersecurity requirements to help detect risks and respond to and recover from cybersecurity incidents. These include requirements to develop and maintain a Cybersecurity Plan, designate a Cybersecurity Officer, and take various measures to maintain cybersecurity within the marine transportation system. The Coast Guard added a request for comments on a potential delay for the implementation periods for U.S.-flagged vessels. The final rule's effective date is July 16, 2025.

Gulf of America Renaming Technical Amendment Publication. The Gulf of America Renaming technical amendment published on Monday, 17 March. The rule updated the name of the Gulf of America in Coast Guard regulations in 33 CFR Chapter I and 46 CFR Chapter I. This change is consistent with Executive Order 14172 “Restoring Names That Honor American Greatness.”

Electronic Submission of Mariner Course Completion Data Final Rule. On November 25 the Coast Guard published the “Electronic Submission of Mariner Course Completion Data” final rule. The rule requires Coast Guard-approved training providers electronically submit student course completion data to the Coast Guard within 5 business days of completion. The National Maritime Center will use this information to validate mariner course completion as part of an application for a Merchant Mariner Credential. These changes will improve the Coast Guard's mariner credential application verification process.

Other Rulemaking.

- Implementation of Training Requirements for Personnel Serving on U.S.-Flagged Passenger Ships that Carry more than 12 Passengers on International Voyages, Notice of proposed rulemaking;
- Great Lakes Pilotage Rates - 2025 Annual Review, Notice of proposed rulemaking;
- Exemption for Active-Duty Uniformed Service Members From Merchant Mariner Credentialing Fees, Final rule;
- Consideration for Acceptance of One or More Viability Testing Methods for Type Approval of Ballast Water Management Systems, Notice of Inquiry;
- Great Lakes Pilotage Modernization, Final rule;
- Marine Equipment on Board Vessels and Offshore Units or Facilities, Final rule;
- TWIC - Reader Requirements; Second Delay Effective Date, Final rule;
- Shipping Safety Fairways in the Gulf of Maine, Advance notice of proposed rulemaking;
- Electronic Submission of Mariner Course Completion Data, Final rule;
- Lifejacket Approval Harmonization, Final rule;
- Great Lakes Pilotage Rates - 2025 Annual Review, Final rule;

Coast Guard Northwest District. Northwest attorneys, based in Seattle, WA, collaborated with the Office of Regulations and Administrative Law and Northwest District staff to establish two new anchorages on the Columbia River improving safety of navigation in an area of increased vessel traffic. Attorneys worked to ensure the rulemakings addressed environmental concerns to threatened species in the area as well as impacts on local tribes.



Response Law

Coast Guard Oceania District. Oceania District assets patrol and maintain a presence in the South Pacific in support of international efforts to manage fisheries on the high seas and enforce the Western and Central Pacific Fisheries Convention (WCPFC). While the United States does not prosecute violations of the convention (unless it is a vessel registered in the U.S.), our consistent presence and participation in the high seas boarding and inspection regime demonstrates our nation's commitment to regional partnerships and to the coalition of like-minded countries. This strengthens regional maritime governance and promotes a rules-based regime for fisheries. Concurrence from the Oceania legal office, based in Honolulu, HA, is required for all statements of no objection routed to the Coast Guard Oceania District Commander to board a vessel pursuant to a WCPFC boarding.

Coast Guard Heartland District. Heartland District attorneys, based in New Orleans, LA, advised on the interdiction of 58 Mexican vessels illegally fishing in U.S. waters and the seizure of over 20,000 pounds of catch illegally caught in U.S. waters. Additionally, the Heartland Attorneys worked with the U.S. Attorney's Office for the Southern District of Texas to develop a mechanism to prosecute foreign vessels engaged in the export of illegally caught U.S. fish. Heartland District attorneys were involved in all aspects of the operational and legal planning for this novel approach to combating illegal fishing in the Gulf of America.

Heartland attorneys also provided real-time, on-site legal advice to the Federal On-Scene Coordinator for multiple oil spills in the marine environment. Most recently, Heartland District attorneys embedded into the Incident Command Post for the response efforts to a natural gas release and oil spill in Garden Bay, LA. There has been a total of 4,097 barrels of oily-water mixture recovered. Due to safety concerns, a temporary flight restriction was imposed for a two-mile radius at 2000 feet, along with a temporary safety zone imposed on the waterway. The attorneys worked closely with the Public Information Officers to ensure the public was updated on the response efforts. During the response, the attorneys also worked closely with the Operations Team and the Federal On-Scene Coordinator to ensure a rapid response and proper documentation of oil recovery, decontamination operations, and the mobilization of assets.



Figure 27: A crew member from Coast Guard Cutter Diligence carries a bale of cocaine during a drug offload at Port Everglades, Florida, Sept. 9, 2024. The offload was a result of three separate drug interdictions by Coast Guard and international partner crews in the Caribbean Sea worth an estimated \$54 million dollars.

Coast Guard Southeast District. Southeast District attorneys, based in Miami, FL, provided 24/7 legal advice on all operational issues arising throughout the District. Attorneys supported the interdiction of over

3000 aliens and 24,000 pounds of narcotics. As part of this support, the attorneys provided advice on over 30 bilateral agreements with partner nations, including the use of shipriders, boarding procedures, and international maritime interdiction support.

Coast Guard Great Lakes District. The Great Lakes District office, based in Cleveland, OH, supported a new Great Lakes District partnership with the Michigan Air National Guard (ANG). Working with Great Lakes response department staff, the team developed a first-of-its-kind Memorandum of Agreement, whereby the Michigan ANG employ MQ-9 “Reaper” unmanned aerial vehicle (UAV) technology in support of Coast Guard Search and Rescue missions on the Great Lakes. The employment of cutting-edge Department of Defense UAV technology will serve to greatly enhance overflight and detection capabilities on the Great Lakes while providing no-cost support and flight hour relief to Coast Guard aircrews and airframes.

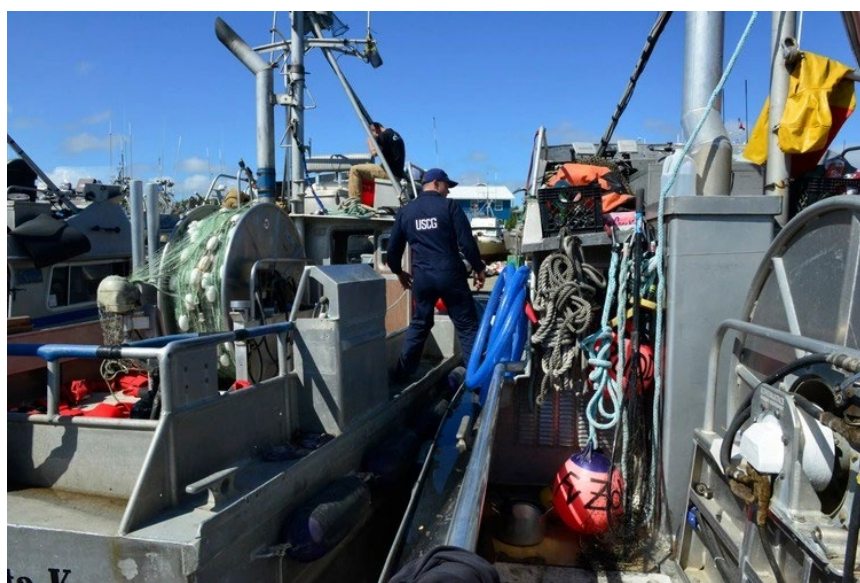


Figure 28: Petty Officer 3rd Class Joshua Smith, a marine inspector from Coast Guard Sector Anchorage's Marine Safety Task Force (MSTF), conducts a dockside commercial fishing vessel safety exam in Naknek, Alaska.

Coast Guard Arctic District. The Arctic District legal staff, based in Juneau, AK, supported ongoing Coast Guard operations along three significant maritime borders, including unresolved boundary disputes and competing claims with Canada and sensitive international navigation routes. Additionally, in coordination with Pacific Area and Department of Defense counterparts, duty attorneys provided on-demand advice in response to ongoing and recurring

foreign naval activity within the Gulf of Alaska, Bering Sea, and Arctic region. Facilitating the regulation of a nationally vital fishing industry, Arctic attorneys supported NOAA Office of Law Enforcement compliance efforts by advising on Coast Guard boardings of fisheries tramper vessels. These vessels are comprised of internationally flagged vessels which load and export U.S. caught fish within ports and roadsteads. This work demands careful authority and jurisdiction analyses, often implicating U.S. flagged fishing vessels for potential violations, and is a unique issue to the Arctic District.

Coast Guard Southwest District. Judge advocates with the Southwest Legal Office in Alameda, CA, provided around-the-clock legal support to Coast Guard operations in the Eastern Pacific and the maritime border and approaches to the United States. Realtime legal advice contributed

to more than 60 at-sea interdictions of drug traffickers and alien smugglers, including the apprehension of 216 suspected drug smugglers and 572 aliens attempting to illegally enter the United States, and the seizure of more than 111,000 kilograms of illegal drugs valued at over \$1.8 billion. Duty attorneys provide advice on Coast Guard authority, jurisdiction over smuggling vessels on the high seas, international law, and use of force policy to stop non-compliant smuggling vessels. Judge advocates also trained more than 20 units deploying to the District's area of responsibility to train on best practices and case package procedures. In addition, the office chaired the North America Maritime Security Initiative (NAMSII) Legal Working Group, a trilateral forum of maritime security organizations in Canada, Mexico, and the United States. This year, the Legal Working Group developed an exercise with Mexico's Navy and Justice Department to enhance collaboration in boarding and evidence collection procedures.

Atlantic Area. Attorneys from Atlantic Area legal office worked closely with Department of Defense and Department of Homeland Security partners to harden and sustain the Coast Guard's operational posture at the southwest border and its maritime approaches. For example, the legal office facilitated a transition to active operations on the Rio Grande River in Texas, enabling Coast Guard small boats from Maritime Safety and Security Teams (MSSTs) and Maritime Security Response Team – East to enforce Title 8 immigration laws and counter illicit trafficking on federally navigable portions of the river. Atlantic Area legal office also coordinated with attorneys from the Coast Guard Heartland District, U.S. Navy Fleet Forces and U.S. Second Fleet to embark a Coast Guard law enforcement team on a U.S. Navy warship in the Gulf of America, protecting the United States' territorial integrity, sovereignty, and security.



Training Centers and the Coast Guard Academy

Legal Services Provided to USCG Training Centers (TRACEN)

TRACENs are located in Cape May, NJ; Yorktown, VA; Petaluma, CA; and Charleston, SC. The TRACENs present unique legal challenges and opportunities as units with significant student throughput and complex mission needs. Mid-grade Coast Guard attorneys serve as the sole independent duty Staff Judge Advocates (SJA) for TRACENs. SJAs advise their commanders on the full range of legal issues and serve as the local Command Director of Legal Assistance, providing critical advice to resolve civil legal matters to promote readiness and morale. The TRACEN SJAs actively participate in various USCG working groups to develop and update law enforcement policies and training, supporting executive branch priorities on fentanyl, migration, and border security.

As the sole accession point for enlisted members, TRACEN Cape May's Legal Office also handles nuanced issues related to recruit discharges and naturalization. TRACEN Cape May partners with U.S. Citizenship and Immigration Services to facilitate naturalization non-citizen Legal Permanent Resident recruits upon graduating from bootcamp.

Legal Services Provided to the Coast Guard Academy

The Coast Guard Academy is one of the smallest and most specialized of America's five federal service academies. Successful completion of the 200-week training program earns graduates of the Academy a Bachelor of Science degree and a commission as an Ensign in the USCG.

The Academy Staff Judge Advocate's Office provides a full suite of command advice to the two-star Superintendent and their staff in carrying out the Academy's duties as both a military training center and a higher education institution. This includes advising on military justice matters, fiscal law issues, administrative investigations, military and civilian personnel matters, civil claims, ethics and legislative support. In addition to these traditional judge advocate practice areas, the Academy attorneys regularly face nuanced higher education issues including: copyright law, intellectual property, academic tenure, NCAA compliance, and academic research grants.

The Academy Staff Judge Advocate's Office is staffed by four uniformed judge advocates. Augmenting the uniformed attorneys are a GS-14 Attorney Advisor, specializing in ethics, fiscal law, and claims, and a GS-14 Legal Assistance Attorney.

In addition to the Staff Judge Advocate's Office, the Academy also has three Judge Advocates on the Academy's rotating military faculty. These officers are responsible for providing undergraduate level instruction on several legal subject areas, including, military justice, constitutional law, and maritime and operational law. Finally, the Academy also has two dedicated Special Victims' Counsel and a Physical Disability Systems attorney on campus.

Office of the Judge Advocate General
Commandant (CG-094)
Coast Guard Mail Stop 7213
2703 Martin Luther King, Ave., SE
Washington, DC 20593-7213

Interested in joining CGJAG? Inquire at:

CoastGuardDCL@uscg.mil

<https://www.uscg.mil/Resources/Legal/JoinCGJAG/>

<https://www.gocoastguard.com/cgjag>

