

# **EXHIBIT 2**

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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION

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LOG CABIN REPUBLICANS, )  
 )  
 Plaintiff, )  
 ) Case No.  
 vs. )  
 ) CV04-8425  
 UNITED STATES OF AMERICA AND ROBERT ) (VAP)(Ex)  
 GATES, Secretary of Defense, )  
 )  
 Defendants. )  
 )

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DEPOSITION OF AARON BELKIN, Ph.D.

March 5, 2010

San Francisco, California

Reported by:

EMI ALBRIGHT

RPR, CSR No. 13042

Job No. 19676

1 Q Have you ever been fired from a  
2 position?

3 A No.

4 Q You ever served in the military?

5 A No.

6 Q Who funds the Palm Center?

7 A We get probably 97, 98 percent of our  
8 money from ten, plus or minus, sources that are  
9 basically stable from year to year. These include  
10 gay rights foundations and private donors, most of  
11 whom are wealthy gay men.

12 Q Who funds your particular research?

13 A So my research doesn't really cost  
14 anything because it's just at a desk. Are you  
15 talking about the Palm Center research or the book  
16 on --

17 Q You, Professor Belkin, if anybody  
18 specifically funds your research --

19 A Sorry.

20 Q -- at the Palm Center?

21 A Sorry. So I have two lines of  
22 research. One is the work for the Palm Center and  
23 the other is the book on military masculinity.  
24 The work for the Palm Center is funded through the  
25 Palm Center. And the work on military masculinity

1 it to the table?

2 Q Was that your expertise on that  
3 particular issue?

4 A Reading the study.

5 Q And then I believe you said  
6 commissioning it?

7 A No, because I helped -- I mean, I  
8 helped frame the research question. And I also  
9 commissioned the Zogby report. And I did not  
10 write the questions in Zogby but I helped embed  
11 the experiment of the Miller Moradi paper in the  
12 Zogby study so that that analysis -- so that that  
13 question could be tested.

14 Q Who carried out the actual testing?

15 A Miller and Moradi.

16 Q Not you?

17 A Right.

18 Q When you say you framed the research  
19 question, what does that mean?

20 A Well, because we have had all these  
21 polls that ask service members, should Don't Ask,  
22 Don't Tell be repealed. But we have never had a  
23 statistical study of the plausibility of the unit  
24 cohesion rationale. I thought that we could use  
25 the Zogby poll as a way to test the plausibility

1 of the unit cohesion rationale. And so in order  
2 to set the poll up to be able to sustain that  
3 test, you had to include the right questions. You  
4 had to include questions about whether someone  
5 knew a gay in their unit so you could get a  
6 measure of outness for that unit, and you had to  
7 include questions about the quality of the unit so  
8 that they could then be correlated.

9 Q That's what you did?

10 A I did not write the questions but it  
11 was my idea to have questions asking those things  
12 on the survey.

13 Q Okay. But the actual formulation of  
14 the questions, that was done by somebody else?

15 A I cannot remember. I may have written  
16 a draft of some of the questions, but the final  
17 version of the survey instrument was produced by  
18 another scholar.

19 Q Who was that?

20 A Dr. Laura Miller.

21 Q And then the actual execution of the  
22 study, that was done by Miller and Moradi?

23 A Moradi.

24 Q Moradi?

25 A Yes.