

Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT  
WESTERN WASHINGTON  
AT TACOMA DIVISION

MAJOR MARGARET WITT,  
Plaintiff,

No. C06-5195 RBL

v.

**DECLARATION OF PAT DOE**

UNITED STATES DEPARTMENT OF  
THE AIR FORCE; ET AL.,  
Defendants.

I, PAT DOE, do hereby declare under penalty of perjury under the laws of the United States of America, that the following facts are true and correct:

1. I am over the age of 18 years, have personal knowledge of the facts contained in this Declaration and am competent to testify to them.

2. I am currently serving in the United States Air Force Reserves. I previously served as a member of the 40<sup>th</sup>/446<sup>th</sup> AES. I have served with Major Witt.

3. I am gay or lesbian. My close friends in the 40<sup>th</sup>/446<sup>th</sup> AES that I socialized with knew that I was gay or lesbian because I expressly confirmed it, and I was often present with my partner at social events. I believe that at least twenty other members in the 40<sup>th</sup>/446<sup>th</sup> AES knew that I was gay or lesbian. Other unit members also may or may not have known. I believe that Colonel Moore-Harbert knew of my sexual orientation because she saw me with my partner on

1 various occasions. She never expressed any problem with us. My sexual orientation has never  
2 given rise to any problems in my service in the 40<sup>th</sup>/446<sup>th</sup> AES; it has been a non-issue. Nobody  
3 cared.

4 4. I have deployed overseas. On deployment, I never experienced any problems  
5 caused by my sexual orientation. My sexual orientation was only relevant at moments when I  
6 was approached by individuals of the opposite sex, who wanted to have sex and commit  
7 adultery. Many of my heterosexual peers engaged in adultery on deployment, I believe in part  
8 because they feared they might die in the warzone. I did not engage in this behavior.

9 5. I have never heard anyone in the 40<sup>th</sup>/446<sup>th</sup> AES say anything about how they did  
10 not like gays or lesbians, or that they did not want to serve with gays or lesbians. In my  
11 experience, sexual orientation has never been an issue in the 40<sup>th</sup>/446<sup>th</sup>.

12 6. Prior to Desert Storm, when there were approximately 300 members in the  
13 40<sup>th</sup>/446<sup>th</sup> AES, I believe there were at least 35 gay and lesbian members serving in the unit. I  
14 explicitly knew that 15 members were gay or lesbian because they were my friends and we  
15 talked about it amongst ourselves when socializing. At present, I suspect that there are at least  
16 ten gay or lesbian members. The unit attitude towards gay and lesbian members has always been  
17 that sexual orientation is a non-issue. What matters in a person is how well they can be a team-  
18 player, contribute to esprit de corps, and how well they do their job.

19 7. When I found out that Major Witt was suspended for being a lesbian, I was  
20 shocked because she was a great officer and her sexual orientation had never been an issue in the  
21 unit. After Major Witt's suspension, I was personally scared that my position in the Air Force  
22 might be in danger due to possible future witch hunts.

23 8. I do not think that Major Witt's sexual orientation had any effect on unit cohesion  
24 or morale. She would not have been selected to serve as the head of Standardization and  
25 Evaluation if her presence negatively impacted our mission. Only the sharpest and the most  
26 qualified are selected for this position.



1 CERTIFICATE OF SERVICE

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3  
4 I hereby certify that on July 22, 2010, I electronically filed the foregoing with the Clerk of  
5 the Court using the CM/ECF system which will send notification of such filing to the  
6 following:

7 Peter J. Phipps Peter.phipps@usdoj.gov  
8 Marion J. Mittet Jamie.mittet@usdoj.gov  
9 Bryan Diedrich bryan.diederich@usdoj.gov  
10 Steven Buckingham Stephen.Buckingham@usdoj.gov  
11 Sarah A. Dunne dunne@aclu-wa.org  
12 Aaron H. Caplan Aaron.caplan@lls.edu

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21  
/s/Lily T. Laemmle  
LILY T. LAEMMLE

NO. C06-5195 RBL

**CARNEY  
BADLEY  
SPELLMAN**

LAW OFFICES  
A PROFESSIONAL SERVICE CORPORATION  
700 FIFTH AVENUE, #5800  
SEATTLE, WA 98104-5017  
FAX (206) 467-8215  
TEL (206) 622-8020