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THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

MAJOR MARGARET WITT,

Case No. C06-5195-RBL

Plaintiff,

v.

DECLARATION OF DAVID POULSEN

UNITED STATES DEPARTMENT OF THE AIR
FORCE; et al.,

Defendants.

I, DAVID POULSEN, 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.

DECLARATION OF DAVID POULSEN -- 1
Case No. C06-5195-RBL

AMERICAN CIVIL LIBERTIES UNION
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705 Second Avenue, Suite 300
Seattle, Washington 98104-1799
(206) 624-2184

1 2. I enlisted in the Air Force Reserve in 1968. I joined the 40th/446th AES in 1973
2 and subsequently served 36 years in the squadron. In 1993, I began working as a full-time Air
3 Reserve Technician, which is a five day a week civilian position on base. I retired in June 2009
4 as a Senior Master Sergeant.

5 3. I met Major Witt when she joined the unit and served with her until she left the
6 unit in 2004. During her last few months of service, we both worked in Aircrew Standardization
7 and Evaluation (StanEval). Since Major Witt was the Chief of StanEval at that time, she wrote
8 one performance report for me. One strong memory I have is that she offered to spend extra time
9 at McChord during the week in order to complete the report. I appreciated the time and thought
10 that she put into it.

11 4. I don't recall how I learned of Major Witt's suspension, but I remember being
12 aware that she was gone and learning of her suspension at some point later. I did not discuss her
13 suspension with other members but I overheard talk in the squadron, so I know that it affected
14 some members deeply. I felt that Major Witt's suspension was a loss to the unit because she was
15 a StanEval caliber professional and a great nurse.

16 5. I never saw any conduct that would indicate that Major Witt is a lesbian and I try
17 not to make assumptions, but rather deal only with facts. I personally never talked about matters
18 of sexual orientation, however every now and then I would hear members engaged in
19 conversation about a presumed gay or lesbian servicemember. I did not give sexual orientation
20 much thought because nobody called attention to it. A member's sexual orientation makes no
21 difference to me so long as the member performs his or her job.

22 6. Prior to Major Witt joining the unit, there were a couple other members in the
23 squadron who others alluded to as being gay or lesbian. I heard rumors of lesbian
24 servicemembers living together, and I know that some members in the unit assumed a male
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1 member was gay based on his mannerisms. Either way, it did not matter to me whether these
2 members were gay because they performed well on the job and did not call attention to their
3 sexual orientation.


4 7. I would say that the unit attitude towards gay and lesbian members was tolerant.
5 I never heard anyone make negative comments about gay or lesbian servicemembers, or say that
6 they did not want to serve with them.

7 8. I deployed overseas in 1991 for Desert Storm. On deployment, I never heard
8 anyone make negative comments regarding gay or lesbian servicemembers.

9 9. My retirement ceremony was held in July 2009 on base. I wanted to invite Major
10 Witt to my ceremony so I asked Colonel Moore-Harbert whether I could do so, since I knew that
11 Major Witt was in the news and I did not want any ramifications. Colonel Moore-Harbert did
12 not express disapproval. Instead she told me that it was my ceremony and I could invite who I
13 wanted.

14 10. Knowing that Major Witt is a lesbian now does not change what I think of her as a
15 professional officer. Her sexual orientation was never an issue. Nor would my opinion of her
16 change if I learned that she is in a long-term relationship with a woman and the relationship
17 started when the woman was technically still married. Major Witt was a positive force and
18 contributor to the betterment of the squadron. Based on my experience with her over the years, I
19 believe that her reinstatement would be beneficial to the unit.
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22 DATED this 27th day of May, 2010, at Lakewood, Washington.

23
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25 
26 David Poulsen

DECLARATION OF DAVID POULSEN -- 3
Case No. C06-5195-RBL

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1 CERTIFICATE OF SERVICE

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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
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/s/Lily T. Laemmle
LILY T. LAEMMLE

NO. C06-5195 RBL

**CARNEY
BADLEY
SPELLMAN**

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