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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

MAJOR MARGARET WITT,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF
THE AIR FORCE; COLONEL MARY L.
WALKER, Commander, 446th
Aeromedical Evacuation Squadron,
McChord Air Force Base; and JAMES G.
ROCHE, SECRETARY, DEPARTMENT
OF THE AIR FORCE;

Defendants.

NO. C06-5195 JKA
RBL

DECLARATION OF STACEY
JULIAN

I, STACEY JULIAN, 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 Affidavit and am competent to testify to them.

DECLARATION OF
STACEY JULIAN – 1
NO. C06-5195 JKA

WIT004 plds hd144205 4/14/06

**CARNEY
BADLEY
SPELLMAN**

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SEATTLE, WA 98104-7010
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1 2. I am a Technical Sergeant in the United States Air Force Reserve. I have
2 known Major Margaret Witt for approximately 8 or 9 years. We serve in the same unit,
3 the 446th Aeromedical Evacuation Squadron ("AES").

4 3. My current assignment is noncommissioned officer in charge of
5 publications. In that position I am responsible for maintaining the regulations that pertain
6 to our unit. I moved to this duty assignment in August or September of 2004 and at that
7 time Major Witt became my immediate superior.

8 4. In 2003 I was deployed to Seeb Air force Base in Oman as part of a real
9 world deployment. This was prior to the invasion of Iraq. During my 45 day tour of duty
10 in Oman, I flew on a couple of missions with Major Witt. The missions which I flew were
11 into Kuwait to pick up injured service members, and to take them from there to either
12 Oman or Germany for further treatment.

13 5. I am very familiar with Major Witt's abilities, knowledge, military skills,
14 and leadership capabilities. I have always known her to be highly professional, skilled and
15 disciplined. She is an excellent flight nurse. Her vast years of experience in the military
16 and particularly aeromedical evacuation aided us in accomplishing every task put before
17 us. In order to be an evaluator you have to be asked by your peers to take the position,
18 and you also have to be appointed by your commander. The fact that she was selected to
19 be chief of Standardization and Evaluation shows how much respect she has throughout
20 our unit. I have the utmost trust and confidence in her abilities as a member of the U.S.
21 Air Force and am honored to serve with her as a member of the 446th AES.

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1 6. I believe that Major Witt is a highly valuable, well-liked and well-respected
2 member of our Unit. She also plays an important role in ensuring the good order, morale
3 and cohesion of our Unit.

4 7. Based on my personal observations of Major Witt I can say with
5 confidence that her presence in the Air Force greatly enhances her Unit's combat
6 efficiency and readiness.

7 8. I have routinely witnessed Major Witt interact with her superiors,
8 subordinates and peers. Major Witt sustains strong working relationships with and has
9 the respect of all of the members of our Unit, regardless of rank. In my experience, Major
10 Witt performs her supervisory duties successfully and professionally. Major Witt's strong
11 relationships help maintain an effective chain of command in our Unit.

12 9. I have witnessed Major Witt's performance of her duties under extremely
13 stressful conditions on flight missions to Kuwait. I also have observed her on a flight
14 mission with an urgent critical patient from Pago Pago to Hawaii. I saw firsthand that she
15 has exceptional clinical skills and is able to apply them under pressure.

16 10. I have always found Major Witt to be a strong, professional and disciplined
17 military officer. I felt fortunate to serve with her in the mid-east Theater and would
18 welcome the opportunity to serve with her again, anywhere in the world.

19 11. I have been aware of her sexual orientation for some time. I was aware of
20 her relationship with her roommate, but I am not sure if I ever met her. Major Witt never
21 talked to me about her relationship with her, but I knew.

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1 12. I believe I found out that the Air Force intends to discharge her from
2 Master Sergeant Jill Brinks. I was told that Colonel Walker had told Major Witt there
3 were some people waiting to see her in a conference room, and escorted her to that room.
4 I was told she met with some JAG officers there, and that they advised her Colonel
5 Walker was initiating a separation proceeding against her. When Major Witt came out of
6 the room she was seen by others to be visibly upset.

7 13. I have talked to many other people in the 446th AES about the decision to
8 initiate separation proceedings against Major Witt, and in general they have reacted with
9 shock, confusion and amazement. I have never heard any service member say they
10 approved of the decision, and in general everyone has responded by asking, "Why?" Our
11 squadron has always had gays and lesbians in it, and their presence is widely known, but
12 until this decision to seek a discharge against Major Witt it has never been an issue. We
13 had two openly gay service members who retired (voluntarily) many years ago and no one
14 ever sought to question their presence in the Air Force.

15 14. In my opinion the Commander's decision to initiate an administrative
16 discharge proceeding against Major Witt has seriously hurt unit morale, and that morale
17 would be further harmed if the Air Force went ahead and actually discharged her. The
18 incident has been seriously deflating to everybody in the 446th AES. Everyone who has
19 discussed it in my presence has said they think the decision was a bad one.

20 15. I have been in the Air Force over 20 years. I recently decided that I would
21 apply for retirement. The Air Force's decision to initiate separation proceedings against

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1 Major Witt was a factor which contributed to my decision to apply for retirement from the
2 service. I no longer want to serve in an organization which mistreats people in the way
3 the Air Force is mistreating her.

4 16. In my opinion, if command were to announce to the entire squadron that
5 Major Witt was a lesbian, and that nevertheless the decision had been made to *retain* her
6 in the Air Force, Major Witt's return to the 446th AES would not have any negative
7 impact upon unit morale, discipline, or combat readiness. On the contrary, her return to
8 the unit would be met with strong approval.

9 17. I do not believe that Major Witt's continued presence in the U.S. Air
10 Force, or specifically in our Unit, would jeopardize recruiting efforts. In fact, I am aware
11 of the fact that Major Witt was selected to appear on various U.S. Air Force recruiting
12 posters, brochures and other materials precisely because she exemplified the qualities that
13 the U.S. Air Force sought in recruits. I have a copy of a recruiting brochure that contains
14 her picture in my house. I know that even though the photo of Major Witt was obviously
15 taken several years ago when she was much younger, the Air Force was still using this
16 recruiting brochure as recently as March of 2004 because I saw it being distributed at a
17 teaching conference my wife attended in Florida at that time. I personally believe that
18 Major Witt exemplifies the qualities that makes one a good and valuable member of the
19 U.S. Air Force.
20

21 18. In all the time that I have known Major Witt and served with her, I have
never seen or heard of anyone in the armed forces expressing any problem with her. I

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1 have never heard anyone complain about her. I have never heard anyone say that they
 2 wished she was not a member of their unit. I have never heard of any incident where she
 3 caused a discipline or morale problem.

4 19. In sum, I firmly believe that discharging Major Witt from the U.S. Air
 5 Force would be extremely detrimental to the Air Force. The 446th AES' morale, cohesion
 6 and good order would be severely harmed if Major Witt is discharged. In my opinion the
 7 Air Force needs officers like Major Witt.

8 DATED this 14 day of April, 2006.

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 11 Stacey Julian
 12 Technical Sergeant, 446th AES
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DECLARATION OF
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