

# CERTIFICATE OF ACHIEVEMENT

Awarded to:

**Margaret Witt**

For Satisfactory Completion of All Requirements

Region 9 Recruit School 00-1

80 Hours

Excellence Through Education

April 29, 2000

*M. Janet Rankin*  
Recruit School Coordinator

This Certificate is  
awarded to

MARGARET WITT

for successful completion

of INTRO. TO WILDLAND FIRE BEHAVIOR

APRIL 27, 2000

DATE



*Bob O'Leary*  
INSTRUCTOR

*Certificate of Training*

This Certificate is  
awarded to

**MARGARET WITT**

for successful completion

of **ADVANCE FIREFIGHTER TRAINING**

MAY 7, 2000

DATE



*Kelly L. O'Leary*  
INSTRUCTOR

*Certificate of Training*

## COLLEGES ATTENDED

<u>NAME OF INSTITUTION</u>	<u>LOCATION</u>	<u>DATES OF ATTENDANCE</u>		<u>DEGREE</u>
		<u>FROM</u>	<u>TO</u>	
Tacoma Community College	Tacoma, WA	Jun 1982	Aug 1983	
Pacific Lutheran University	Tacoma, WA	Sep 1982	Aug 1986	BS-Nursing
United States Air Force School of Aerospace Medicine	Brooks AFB, TX	Feb 1990	Nov 1991	
Park College	Parkville, MO	Jan 1994	Apr 1994	
Belleville Area College	Belleville, IL	May 1994	Jul 1995	
Maryville University	St. Louis, MO	Aug 1994	May 1995	
New College of California	St. Louis, MO	May 1995	Oct 1995	
University of Missouri-St Louis	St. Louis, MO	Jun 1995	Aug 1995	
Air University	Maxwell AFB, AL	Jul 1994	Jun 1995	
Eastern Washington University	Cheney, WA	Dec 1989	Dec 1989	
Air Command and Staff College	Maxwell AFB, AL	Jan 1996	Dec 1998	Masters PT
		Aug 2001	Present	

CAUTION: NOT TO BE USED FOR IDENTIFICATION PURPOSES

THIS IS AN IMPORTANT RECORD. SAFEGUARD IT.

ANY ALTERATIONS IN SHADED AREAS RENDER FORM VOID

# CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY

1. NAME (Last, First, Middle) **MARGARET HELEN**  
 2. DEPARTMENT, COMPONENT AND BRANCH **AIR FORCE - REG AF**  
 3. SOCIAL SECURITY NO. [REDACTED]

GRADE, RATE OR RANK **CAPT** 4.b. PAY GRADE **O3**  
 5. DATE OF BIRTH (YYMMDD) **64 [REDACTED]** 6. RESERVE OBLIG. TERM. DATE  
 Year **N/A** Month  Day

7.a. PLACE OF ENTRY INTO ACTIVE DUTY **TACOMA WA**  
 7.b. HOME OF RECORD AT TIME OF ENTRY (City and state, or complete address if known) **TACOMA WA**

8.a. LAST DUTY ASSIGNMENT AND MAJOR COMMAND **375 AES (AMC)**  
 8.b. STATION WHERE SEPARATED **SCOTT AFB IL**

9. COMMAND TO WHICH TRANSFERRED **NOT APPLICABLE**  
 10. SGLI COVERAGE  None  
 Amount: \$ **200,000**

11. PRIMARY SPECIALTY (List number, title and years and months in specialty. List additional specialty numbers and titles involving periods of one or more years.)	12. RECORD OF SERVICE		
	Year(s)	Month(s)	Day(s)
046S3 - OPERATING ROOM NURSE, 5 YEARS 3 MONTHS	1987	Apr	29
X046F3 - AIRCREW FLIGHT NURSE, 3 YEARS, 4 MONTHS	1995	Dec	15
	08	07	17
	00	00	00
	00	01	05
	02	01	07
	00	00	00
	1991	Apr	11

13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN RIBBONS AWARDED OR AUTHORIZED (All periods of service)  
**MERITORIOUS SERVICE MEDAL, AF COMMENDATION MEDAL, AF ACHIEVEMENT MEDAL WITH ONE OAK LEAF CLUSTER, AF OUTSTANDING UNIT AWARD WITH TWO OAK LEAF CLUSTERS, COMBAT READINESS MEDAL WITH BRONZE STAR, SMALL ARMS (SEE REMARKS)**

14. MILITARY EDUCATION (Course title, number of weeks, and month and year completed)  
**MILITARY INDOCTRINATION MEDICAL SERVICE OFFICER, 2 WKS, APR 87. NURSING SERVICE MANAGEMENT, CORRESPONDENCE, MAY 88. BATTLEFIELD NURSING CRSE, 2 WKS, FEB 90. COACHING AND COUNSELING FOR THE NEW SUPERVISOR, (SEE REMARKS)**

15.a. MEMBER CONTRIBUTED TO POST-VIETNAM ERA VETERANS' EDUCATIONAL ASSISTANCE PROGRAM  
 Yes  No  15.b. HIGH SCHOOL GRADUATE OR EQUIVALENT  
 Yes  No  16. DAYS ACCRUED LEAVE PAID  
**- 5 -**

17. MEMBER WAS PROVIDED COMPLETE DENTAL EXAMINATION AND ALL APPROPRIATE DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION  
 Yes  No

18. REMARKS  
 ITEM 13. MARKSMANSHIP RIBBON WITH BRONZE SERVICE STAR, NATIONAL DEFENSE SERVICE MEDAL, AF OVERSEAS LONG TOUR RIBBON, AF LONGEVITY SERVICE AWARD WITH ONE OAK LEAF CLUSTER, AF TRAINING RIBBON, ITEM 14. 8 HRS, NOV 90 FLIGHT SCHOOL, 5 WKS, NOV 91. MS DOS, 8 HRS, FEB 94. EMAIL COMPUTER CRSE, 4 HRS, FEB 94. WORDPERFECT FOR WINDOWS, 8 HRS, MAR 94. TEAMS AND TOOLS, 8 HRS, MAR 94. QUALITY AWARENESS TRAINING, 8 HRS, FEB 94. NEONATAL RESUSCITATION, 2 DAYS, AUG 95. ADVANCED CARDIAC LIFE SUPPORT, 2 DAYS, JUN 95. SQUADRON OFFICER SCHOOL, CORRESPONDENCE, JUL 95. LIEUTENANTS PROFESSIONAL DEVELOPMENT PROGRAM, 1 WK, OCT 89. MEMBER HAS COMPLETED INITIAL ACTIVE DUTY SERVICE COMMITMENTS. SERVED 2 AUG 90 TO 15 DEC 95 IN [REDACTED]  
 Data herein are subject to computer matching within DoD or with other agencies for verification purposes and determining eligibility or compliance for Federal benefits.

19.a. MAILING ADDRESS AFTER SEPARATION (include Zip Code)  
**7037 GRANDVIEW PLACE  
 GIG HARBOR WA 98335**

19.b. NEAREST RELATIVE (Name and address - include Zip Code)  
**GLORIA & FRANK WITT  
 7037 GRANDVIEW PLACE  
 GIG HARBOR WA 98335**

20. MEMBER REQUESTS COPY 4 BE SENT TO VVA DIR. OF VET. AFFAIRS  Yes  No  
 21. SIGNATURE OF MEMBER BEING SEPARATED  
 22. OFFICIAL AUTHORIZED TO SIGN (Typed name, grade, title and signature)  
**NANCY M. FAULBEE, MSgt, USAF  
 SUPT. Retirements & Separations**

### SPECIAL ADDITIONAL INFORMATION (For use by authorized agencies only)

23. TYPE OF SEPARATION **DISCHARGE**  
 24. CHARACTER OF SERVICE (include upgrades) **HONORABLE**  
 SEPARATION AUTHORITY **AFI 36-3207**  
 26. SEPARATION CODE **FBK**  
 27. REENTRY CODE **NOT APPLICABLE**

28. NARRATIVE REASON FOR SEPARATION  
**COMPLETION OF REQUIRED ACTIVE SERVICE**

29. DATES OF TIME LOST DURING THIS PERIOD  
**NONE**

30. MEMBER REQUESTS COPY 4  
 Initials **AF000897**

1. NAME (LAST, FIRST, MI) 2. DEPARTMENT, COMPONENT AND BRANCH 3. SOCIAL SECURITY  
T MARGARET HELEN AIR FORCE -- REG AF [REDACTED]

4a. GRADE, RATE, OR RANK 4b. PAY GRADE 4c. DATE OF SEPARATION  
CAPT O3 1995 Dec 15

SUPPORT OF OPERATION DESERT SHIELD/STORM. -----NOTHING FOLLOWS-----

WITT MARGARET HELEN

NANCY M. TAULBEE, MSgt, USAF  
SUPT, Retirements & Separations



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ANY ALTERATIONS IN SHADED AREAS RENDER FORM VOID

CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY

1. NAME (Last, First, Middle) MARGARET HELEN WITTE		2. DEPARTMENT, COMPONENT AND BRANCH AIR FORCE -- USAFR		3. SOCIAL SECURITY NUMBER [REDACTED]				
4a. RATE OR RANK MAJ		4b. PAY GRADE O4		5. DATE OF BIRTH (YYYYMMDD) 1964 [REDACTED]				
7a. PLACE OF ENTRY INTO ACTIVE DUTY MCCHORD AFB WA		6. RESERVE OBLIGATION TERMINATION DATE (YYYYMMDD) NA N/A						
8a. LAST DUTY ASSIGNMENT AND MAJOR COMMAND 446 AES (AFRC)			b. STATION WHERE SEPARATED MCCHORD AFB WA					
9. COMMAND TO WHICH TRANSFERRED USAFR				10. SGLI COVERAGE AMOUNT: \$250,000				
11. PRIMARY SPECIALTY (List number, title and years and months in specialty. List additional specialty numbers and titles involving periods of one or more years.) X46F3, FLIGHT NURSE, 7 MONTHS				12. RECORD OF SERVICE				
				a. DATE ENTERED AD THIS PERIOD		2003	JAN	01
				b. SEPARATION DATE THIS PERIOD		2003	JUL	30
				c. NET ACTIVE SERVICE THIS PERIOD		00	07	00
				d. TOTAL PRIOR ACTIVE SERVICE		09	00	09
				e. TOTAL PRIOR INACTIVE SERVICE		06	08	28
				f. FOREIGN SERVICE		00	00	00
				g. SEA SERVICE		00	00	00
13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN RIBBONS AWARDED OR AUTHORIZED (All periods of service) AIR FORCE COMMENDATION MEDAL, AIR FORCE ACHIEVEMENT MEDAL WITH 2 DEVICES, AERIAL ACHIEVEMENT MEDAL, COMBAT READINESS MEDAL WITH 4 BRONZE STARS, SMALL (SEE REMARKS)				14. MILITARY EDUCATION (Course title, number of weeks, and month and year completed) NONE				
15. MEMBER CONTRIBUTED TO POST-VIETNAM ERA VETERANS' EDUCATIONAL ASSISTANCE PROGRAM								
b. HIGH SCHOOL GRADUATE OR EQUIVALENT								
16. DAYS ACCRUED LEAVE PAID 0.0		17. MEMBER WAS PROVIDED COMPLETE DENTAL EXAMINATION AND ALL APPROPRIATE DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION		YES NO X YES YES NO				
18. REMARKS ITEM 13 ARMS EXPERT MARKSMANSHIP RIBBON WITH DEVICE, NATIONAL DEFENSE SERVICE MEDAL WITH 1 DEVICE, AIR FORCE OVERSEAS LONG TOUR RIBBON, AIR FORCE TRAINING RIBBON, AIR FORCE LONGEVITY SERVICE AWARD WITH 3 DEVICES, ARMED FORCES EXPEDITIONARY MEDAL, AIR FORCE OUTSTANDING UNIT AWARD WITH 3 DEVICES, MERITORIOUS SERVICE MEDAL, ARMED FORCES RESERVE MEDAL WITH "M" DEVICE. MEMBER SERVED IN OPERATION ENDURING FREEDOM, MCCHORD AFB WA 1 JAN 2003-30 JUL 2003. MEMBER IN AOR 6 JAN 03-28 FEB 03 PERIOD OF SERVICE UNDER 10 USC 12302 IS EXEMPT FROM 5 YEARS CUMULATIVE SERVICE UNDER TITLE 38 CHAPTER 43 SECTION (C)(4)(A).								
19a. MAILING ADDRESS AFTER SEPARATION (Include Zip Code) MARGARET H. WITTE 1022 WEST 19TH AVENUE SPOKANE WA 99203				b. NEAREST RELATIVE (Name and address - include Zip Code) FRANK WITTE 7037 GRANDVIEW PLACE GIG HARBOR WA 98335				
20. MEMBER REQUESTS COPY 6 BE SENT TO: WVA DIRECTOR OF VETERANS AFFAIRS								
21. SIGNATURE OF MEMBER BEING SEPARATED MEMBER NOT AVAILABLE TO SIGN				22. OFFICIAL AUTHORIZED TO SIGN (Typed name, grade, title and signature) JEREMY A. BARKER MSCT, USAFR CHIEF PERSONNEL RELOCATIONS				

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CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY

1. NAME (Last, First, Middle) MARGARET HELEN WITT  
 2. DEPARTMENT, COMPONENT AND BRANCH AIR FORCE - USAFR  
 3. SOCIAL SECURITY NUMBER [REDACTED]  
 4. GRADE, RATE OR RANK [REDACTED] b. PAY GRADE O4  
 5. DATE OF BIRTH (YYYYMMDD) 1964 [REDACTED]  
 6. RESERVE OBLIGATION TERMINATION DATE (YYYYMMDD) NA N/A  
 7a. PLACE OF ENTRY INTO ACTIVE DUTY MCCHORD AFB WA  
 b. HOME OF RECORD AT TIME OF ENTRY (City and state, or complete address if known) 1022 WEST 19TH AVENUE SPOKANE WA 99203  
 8a. LAST DUTY ASSIGNMENT AND MAJOR COMMAND 446 AES (AFRC)  
 b. STATION WHERE SEPARATED MCCHORD AFB WA  
 9. COMMAND TO WHICH TRANSFERRED USAFR

10. SGLI COVERAGE NONE  
 AMOUNT: \$250,000  
 11. PRIMARY SPECIALTY (List number, title and years and months in specialty. List additional specialty numbers and titles involving periods of one or more years.) X46F3, FLIGHT NURSE, 7 MONTHS  
 12. RECORD OF SERVICE  

	YEAR(s)	MONTH(s)	DAY(s)
a. DATE ENTERED AD THIS PERIOD	2003	JAN	01
b. SEPARATION DATE THIS PERIOD	2003	JUL	30
c. NET ACTIVE SERVICE THIS PERIOD	00	07	00
d. TOTAL PRIOR ACTIVE SERVICE	00	00	00
e. TOTAL PRIOR INACTIVE SERVICE	06	08	28
f. FOREIGN SERVICE	00	00	00
g. SEA SERVICE	00	00	00
h. EFFECTIVE DATE OF PAY GRADE	1999	OCT	01

 13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN RIBBONS AWARDED OR AUTHORIZED (All periods of service) AIR FORCE COMMENDATION MEDAL, AIR FORCE ACHIEVEMENT MEDAL WITH 2 DEVICES, AERIAL ACHIEVEMENT MEDAL, COMBAT READINESS MEDAL WITH 4 BRONZE STARS, SMALL (SEE REMARKS)  
 14. MILITARY EDUCATION (Course title, number of weeks, and month and year completed) NONE

15. MEMBER CONTRIBUTED TO POST-VIETNAM ERA VETERANS' EDUCATIONAL ASSISTANCE PROGRAM  
 b. HIGH SCHOOL GRADUATE OR EQUIVALENT YES X NO  
 16. DAYS ACCRUED LEAVE PAID 0.0 YES X NO  
 17. MEMBER WAS PROVIDED COMPLETE DENTAL EXAMINATION AND ALL APPROPRIATE DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION YES X NO

18. REMARKS  
 ITEM 13: ARMS EXPERT MARKSMANSHIP RIBBON WITH DEVICE, NATIONAL DEFENSE SERVICE MEDAL WITH 1 DEVICE, AIR FORCE OVERSEAS LONG TOUR RIBBON, AIR FORCE TRAINING RIBBON, AIR FORCE LONGEVITY SERVICE AWARD WITH 3 DEVICES, ARMED FORCES EXPEDITIONARY MEDAL, AIR FORCE OUTSTANDING UNIT AWARD WITH 3 DEVICES, MERITORIOUS SERVICE MEDAL, ARMED FORCES RESERVE MEDAL WITH "M" DEVICE. MEMBER SERVED IN OPERATION ENDURING FREEDOM, MCCHORD AFB WA 1 JAN 2003-30 JUL 2003. MEMBER IN AOR 6 JAN 03-28 FEB 03 PERIOD OF SERVICE UNDER 10 USC 12302 IS EXEMPT FROM 5 YEARS CUMULATIVE SERVICE UNDER TITLE 38 CHAPTER 43 SECTION (C)(4)(A).  
 The information contained herein is subject to computer matching within the Department of Defense or with any other affected Federal or non-Federal agency for verification purposes and to determine eligibility for, and/or continued compliance with, the requirements of a Federal benefit program.

19a. MAILING ADDRESS AFTER SEPARATION (Include Zip Code) MARGARET H WITT 1022 WEST 19TH AVENUE SPOKANE WA 99203  
 b. NEAREST RELATIVE (Name and address include Zip Code) FRANK WITT 7037 GRANDVIEW PLACE GIG HARBOR WA 98335

20. MEMBER REQUESTS COPY 6 BE SENT TO: WVA DIRECTOR OF VETERANS AFFAIRS  
 21. SIGNATURE OF MEMBER BEING SEPARATED MEMBER NOT AVAILABLE TO SIGN  
 22. OFFICIAL AUTHORIZED TO SIGN (Typed name, grade, title and signature) JERRY A BARRETT MSCT, USAFR CHIEF PERSONNEL RELOCATIONS  
 YES X NO

23. TYPE OF SEPARATION RELEASE FROM ACTIVE DUTY  
 24. CHARACTER OF SERVICE (Include upgrades) HONORABLE  
 25. SEPARATION AUTHORITY AFF 36-3209  
 26. SEPARATION CODE T50  
 27. REENTRY CODE NOT APPLICABLE  
 28. NARRATIVE REASON FOR SEPARATION USAFR MEMBER RELEASED DUE TO DEMOBILIZATION  
 29. DATES OF TIME LOST DURING THIS PERIOD (YYYYMMDD) NONE  
 30. MEMBER REQUESTS COPY 4 (Initials) N/A



INDEX TO DECLARATIONS  
Major Margaret H. Witt  
U.S. Air Force Reserve

1. Declaration of Technical Sergeant Stacey Julian
2. Declaration of Senior Master Sergeant James Schaffer
3. Affidavit of Major Faith Mueller
4. Declaration of Major Julia Scott
5. Declaration of Major Sue Schindler
6. Declaration of Major Sharon Carlson
7. Declaration of Master Sergeant Jill Brinks
8. Declaration of Major Annie Thomas
9. Declaration of Major Vince Oda
10. Declaration of Major Thomas M. Hansen
11. Letter of Nancy M. Royse MSPT
12. Letter of Tech Sergeant Leah Crawford
13. Letter of Deena Harris
14. Letter of Ingrid Kinder
15. Letter of Major Kenneth Winslow
16. Letter of Kathleen Freeman-Lorentz
17. Letter of Major Carolyn Newhouse
18. Letter of Capt Edmond Hrivnak
19. Letter of Melodie Hayashi-Taisey
20. Letter of Maj Judith A. Krill  
Letter of MSgt Aaron Maness  
Letter of 2Lt Jill Brinks

EXHIBIT 1

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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, 446<sup>th</sup>  
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

CARNEY  
BADLEY  
SPELLMAN

LAW OFFICES  
A PROFESSIONAL SERVICE CORPORATION  
701 FIFTH AVENUE, #3600  
SEATTLE, WA 98104-7010  
FAX (206) 622-8983  
TEL (206) 622-8020

WIT004 File 54144205 4/14/06

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 446<sup>th</sup> 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 446<sup>th</sup> AES.

DECLARATION OF  
STACEY JULIAN - 2  
NO. C06-5195 JKA

\_\_\_\_\_  
CARNEY  
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TEL (206) 622-8904

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.

DECLARATION OF  
STACEY JULIAN -3  
NO. C06-5195 JKA

\_\_\_\_\_  
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AF000905

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 446<sup>th</sup> 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 446<sup>th</sup> 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

DECLARATION OF  
STACEY JULIAN - 4  
NO. C06-5195 JKA

\_\_\_\_\_  
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TEL (206) 622-8906



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 446<sup>th</sup> 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

DECLARATION OF  
STACEY JULIAN - 5  
NO. C06-5195 JKA

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AP000907

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 446<sup>th</sup> 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.

9  
 10  
 11   
 12 Stacey Julian  
 13 Technical Sergeant, 446<sup>th</sup> AES  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21

DECLARATION OF  
 STACEY JULIAN - 6  
 NO. C06-5195 JKA

WIT004 plds hd144205 4/14/06

CARNEY  
 BADLEY  
 SPELLMAN

LAW OFFICES  
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EXHIBIT 2

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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, 446<sup>th</sup>  
Aeromedical Evacuation Squadron,  
McChord Air Force Base; and JAMES G.  
ROCHE, SECRETARY, DEPARTMENT  
OF THE AIR FORCE;

Defendants.

NO.

DECLARATION OF JAMES  
SCHAFFER

I, JAMES SCHAFFER, 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.

AFFIDAVIT OF JAMES SCHAFFER - 1

CARNEY  
BADLEY  
SPELLMAN

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1           2.     I am a Senior Master Sergeant in the United States Air Force Reserve. I  
2 have known Major Margaret Witt for approximately seven years. We serve in the same  
3 unit, the 446<sup>th</sup> Aeromedical Evacuation Squadron ("AES"). We also both live in  
4 Spokane, Washington. I am a full time professional Firefighter for the City of Spokane.  
5 Margie was a volunteer with Spokane County Fire District 8.

6           3.     I have been a member of the 446<sup>th</sup> /40<sup>th</sup> AES (Unit was originally the 40<sup>th</sup>  
7 AES until sometime in 1995/96 when it was re-designated the 446<sup>th</sup> AES) since 1991.  
8 The 446<sup>th</sup> is one of three Aeromedical Evacuation Squadrons in the western United States.  
9 My current assignment is Superintendent of Operations for the 446<sup>th</sup> AES. In that  
10 position I am responsible for scheduling all flight operations for the 446<sup>th</sup> AES at  
11 McChord. These flights include training flights, in which members practice the  
12 evacuation of injured or ill military and DOD personnel in exercises designed to simulate  
13 battlefield extractions. I am also responsible for scheduling and coordinating real-world  
14 flights for the transportation of injured and sick patients. Occasionally, we also do urgent  
15 real world flights where we are transporting patients with critical life/limb/eyesight  
16 problems.

17           4.     I do regular UTA (Unit Training Assembly) duty at McChord Air Force  
18 Base. For the past six or seven years, until November of 2004, I was in the habit of  
19 seeing Major Witt every UTA weekend when we would take the same UTA pick-up flight  
20 from Fairchild Air Force Base to McChord Air Force Base.  
21

AFFIDAVIT OF JAMES SCHAFFER - 2

CARNEY  
BADLEY  
SPELLMAN

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1           5.     Up until November of 2004 in the performance of my duties I worked  
2 regularly with Major Witt. As head of Standards and Evaluations, Major Witt was  
3 responsible for insuring that every person scheduled to fly on a flight was ready for real  
4 world deployment; that they were properly trained, certified, vaccinated and in physical  
5 condition to depart. I worked with her on the staffing of all scheduled flights.

6           6.     In 2003 I was deployed to Seeb Air force Base in Oman as part of a real  
7 world deployment. This was during the buildup of forces prior to the start of Operation  
8 Iraqi Freedom. During my tour of duty in Oman, I was assigned to Maj. Witt's flight  
9 crew where I flew with Major Witt on real world missions, many of which were flights to  
10 pick up and transport armed forces personnel injured in Afghanistan and Kuwait in the  
11 build-up prior to OIF. We flew many urgent missions in the theater of operations taking  
12 critically-wounded, injured and ill U.S. service members out of those areas. As a result of  
13 this flight experience with Major Witt, I am extremely familiar with her abilities,  
14 knowledge, military skills, and leadership capabilities.

15           7.     I have always known Major Witt to be highly professional, skilled and  
16 disciplined. I have the utmost trust and confidence in her abilities as a member of the  
17 U.S. Air Force and am honored to serve with her as a member of the 446<sup>th</sup> AES.

18           8.     I believe that Major Witt is a highly valuable, well-liked and well-respected  
19 member of our Unit. She also plays an important role in ensuring the good order, morale  
20 and cohesion of our Unit. She is highly skilled at managing people under her command,  
21 and knows how to be inclusive when she leads.

AFFIDAVIT OF JAMES SCHAFFER - 3

CARNEY  
BADLEY  
SPELLMAN

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1           9.     Based on my personal observations of Major Witt I can say with  
2 confidence that her presence in the Air Force greatly enhances our Unit's combat  
3 efficiency and readiness.

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

9           11.    I have had occasion to witness Major Witt's performance of her duties  
10 under extremely stressful conditions. For example, I flew with her from Seeb Air Base in  
11 Oman to Kuwait and from there to Germany, on a mission involving the transportation of  
12 injured service members. These were extremely long and stressful missions during which  
13 she coordinated the transportation of the injured flawlessly. I also had occasion to see her  
14 respond in an emergency situation. While at Seeb AB Oman, there was a fire in a latrine  
15 and a service member was blinded by the smoke. Maj. Witt immediately took charge of  
16 the situation, treated the service member when no other help was immediately available,  
17 and in my opinion probably saved his eyesight. On another occasion while flying on a  
18 Contract commercial flight back to the United States a civilian DOD employee on the  
19 flight suffered possible Cardiogenic shock, and collapsed on the aircraft while in-flight.  
20 Maj. Witt went into action and saved his life.  
21

AFFIDAVIT OF JAMES SCHAFFER - 4

CARNEY  
BADLEY  
SPELLMAN

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1 11. I have always found Major Witt to be strong, professional and disciplined  
2 military officer. I felt fortunate to serve with her in the Southwest Asia Theater of  
3 operations and would welcome the opportunity to serve with her again, anywhere in the  
4 world, in any conditions.

5 12. During the summer of 2004, Major Witt told me that she was advised she  
6 was under investigation for commission of homosexual acts. Later, in November of 2004,  
7 when she failed to show up for our regular monthly UTA flight from Fairchild to  
8 McChord, I gave her a call and asked her what was going on. She told me she was not  
9 coming to McChord for the monthly UTA. She told me that Colonel Moore-Harbert and  
10 Major Verna Madison had informed her that Colonel Walker had initiated separation  
11 proceedings against her. I later spoke to Colonel Moore-Harbert about this, and she told  
12 me that informing Major Witt of Colonel Walker's separation action was the hardest thing  
13 she ever had to do in the Air Force. Colonel Moore-Harbert told me that she cried when  
14 she told Major Witt of Colonel Walker's action.

15 13. I also have talked to Major Verna Madison about this matter. Major  
16 Madison told me that she was so upset about Colonel Walker's decision that she felt like  
17 taking off her uniform.

18 14. Many other people in the 446<sup>th</sup> AES have approached me asking about the  
19 decision to initiate separation proceedings against Major Witt, and they are all upset and  
20 angry. In my opinion, if command were to announce to the entire squadron that Major  
21 Witt was a lesbian, and that nevertheless the decision had been made to retain her in the

AFFIDAVIT OF JAMES SCHAFFER - 5

CARNEY  
BADLEY  
SPELLMAN

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1 Air Force, Major Witt's return to the 446<sup>th</sup> AES would not have any negative impact upon  
2 unit morale, discipline, or combat readiness.

3 15. On the contrary, I think most people would be completely indifferent to the  
4 fact that she is a lesbian, and I cannot think of a single person who would object to her  
5 return to the unit. In my opinion, even the most conservative people in the unit would not  
6 have any problem with her return to duty.

7 16. I believe the morale of the 446<sup>th</sup> AES has already been damaged by the  
8 decision to prohibit her from reporting for reserve duty, and that it would only be further  
9 harmed if her separation from the Air Force was accomplished.

10 17. Nor do I believe that Major Witt's continued presence in the U.S. Air  
11 Force, or specifically in our Unit, would jeopardize recruiting efforts. In fact, I am aware  
12 of the fact that Major Witt was selected to appear on various U.S. Air Force recruiting  
13 posters, brochures and other materials precisely because she exemplified the qualities that  
14 the U.S. Air Force sought in recruits. I personally believe that Major Witt exemplifies the  
15 qualities that makes one a good and valuable member of the U.S. Air Force.

16 18. In all the time that I have known Major Witt and served with her, I have  
17 never seen or heard of anyone in the armed forces expressing any problem with her. I  
18 have never heard anyone complain about her. I have never heard anyone say that they  
19 wished she was not a member of their unit. I have never heard of any incident where she  
20 caused a discipline or morale problem.  
21

AFFIDAVIT OF JAMES SCHAFFER - 6

CARNEY  
BADLEY  
SPELLMAN

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AF000915

1           19. It is important to recognize how significant it is that Major Witt was  
2 selected to be the chief of Standards and Evaluations for the 446<sup>th</sup> AES. The person  
3 selected to be the head of StanEval has to be "the best of the best." That is why they are  
4 selected for that position. The person who evaluates the performance of others has to be  
5 extremely highly regarded by the rest of the unit in order to perform the evaluation job  
6 successfully. That is why Major Witt was selected for the position - because she is so  
7 uniformly highly regarded by everyone in the unit.

8           20. In sum, I firmly believe that discharging Major Witt from the U.S. Air  
9 Force would be extremely detrimental to the Air Force. The 446<sup>th</sup> AES' morale, cohesion  
10 and good order would be severely jeopardized if Major Witt is discharged. Moreover, it  
11 would be downright stupid to discharge such a skilled and knowledgeable officer,  
12 especially in a time of war when people with her level of military skill and  
13 professionalism are so badly needed, and in such short supply.

14           DATED this 25<sup>th</sup> day of March, 2005.

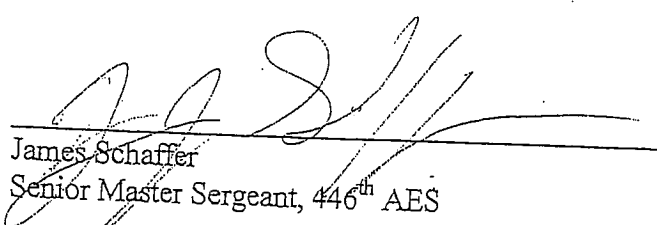
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20           James Schaffer  
21           Senior Master Sergeant, 446<sup>th</sup> AES

EXHIBIT 3

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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, 446<sup>th</sup> Aeromedical  
Evacuation Squadron, McChord Air Force  
Base; and JAMES G. ROCHE,  
SECRETARY, DEPARTMENT OF THE  
AIR FORCE;  
  
Defendants.

NO. C06-5195RBL

AFFIDAVIT OF MAJOR FAITH M.  
MUELLER

STATE OF WASHINGTON )  
  
COUNTY OF KING ) ss.

Major Faith M. Mueller, being first duly sworn upon oath, deposes and states as follows:

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.

AFFIDAVIT OF  
MAJOR FAITH M. MUELLER - 1

CARNEY  
BADLEY  
SPELLMAN

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1           2.     I have known Major Margaret Witt for approximately eight years. I first met  
2 Major Witt in the U.S. Air Force Reserves.

3           3.     I have been a member of the U.S. Air Force Reserves for 18 years and am  
4 stationed at McChord Air Force Base in Tacoma, Washington. My title is Flight Nurse and  
5 my duties include flying into Combat Air Support Hospitals and attending to the medical  
6 needs of wounded soldiers while they are being transported out to definitive treatment  
7 facilities.

8           4.     In the performance of my duties, I regularly work with Major Witt. We work  
9 together in a number of ways, including flight training and operational missions.

10          5.     I have always known Major Witt to be highly professional, skilled and  
11 disciplined. I have the utmost trust and confidence in her abilities as a member of the U.S.  
12 Air Force and am honored to serve with her as a member of the same squadron.

13          6.     I believe that Major Witt is a highly valuable, well-liked and well-respected  
14 member of our squadron. She also plays an important role in ensuring the good order, morale  
15 and cohesion of our Unit. For example, Major Witt is considered a premier authority on  
16 military regulations and routinely serves as a resource to me and other members of our  
17 squadron.

18          7.     Based on my personal observations of Major Witt I can say with confidence  
19 that her presence in the U.S. Air Force greatly enhances our squadron's combat efficiency  
20 and readiness.

21          8.     I have routinely witnessed Major Witt interact with her superiors, subordinates  
and peers. I believe that Major Witt sustains strong working relationships with and has the

AFFIDAVIT OF  
MAJOR FAITH M. MUELLER - 2

WIT nlds fl22hh02 12/23/04

**CARNEY**  
**BADLEY**  
**SPELLMAN**

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1 respect of all of the members of our squadron, regardless of rank. In my experience, Major  
2 Witt performs her supervisory duties successfully and professionally. Major Witt's strong  
3 relationships help maintain an effective chain of command in our squadron.

4 9. I have not served in active duty with Major Witt, but based upon my  
5 experience with her, I would have absolutely no hesitation in doing so. In fact, I would  
6 welcome the opportunity to serve with Major Witt and would fly with her at any time under  
7 any circumstances

8 10. I have not shared confined sleeping and dressing areas, showers or toilet  
9 facilities with Major Witt in barracks that allowed for minimal privacy. However, I am  
10 completely comfortable in doing so and would not feel that my privacy would, in any way, be  
11 impinged by sharing these confined quarters with Major Witt.

12 11. I do not believe that Major Witt's presence in the U.S. Air Force or,  
13 specifically, in our squadron would jeopardize recruiting efforts. In fact, I understand that  
14 Major Witt was selected to appear on various U.S. Air Force recruiting posters, brochures and  
15 other materials presumably because she exemplifies the qualities that the U.S. Air Force  
16 sought in recruits. I also personally believe that Major Witt exemplifies the qualities that  
17 makes one a good and valuable member of the U.S. Air Force.

18 12. In all the time that I have known Major Witt and served with her, I have never  
19 seen or heard of anyone in the armed forces expressing any problem with her. I have never  
20 heard anyone complain about her. I have never heard anyone say that they wished she was  
21 not a member of their squadron. I have never heard of any incident where she caused a  
discipline or morale problem.

AFFIDAVIT OF  
MAJOR FAITH M. MUELLER - 3

WIT plds f122bb02 12/23/04

**CARNEY**  
**BADLEY**  
**SPELLMAN**

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AF000920

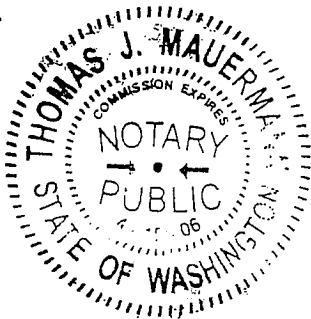
1 13. I was recently told by a friend of Major Witt's that she believes Major Witt is  
2 being discharged because she is accused of being a lesbian. Before I was told this, I  
3 suspected Major Witt was a lesbian. I can say without reservation that this fact makes  
4 absolutely no difference to me. In my opinion, if command were to announce to everyone on  
5 base that Major Witt was lesbian and that she was remaining in the service, her continued  
6 presence in the Air Force would not have any negative impact upon our squadron's morale,  
7 discipline, or combat readiness, and no negative impact whatsoever upon me personally. It  
8 would still be my strong desire to have her remain in the service and to continue to work with  
9 her.

10 14. In sum, I firmly believe that discharging Major Witt from the U.S. Air Force  
11 would be detrimental. Moreover, I believe that our Unit's morale, cohesion and good order  
12 would be severely jeopardized if Major Witt is discharged.

13 DATED this \_\_\_\_\_ day of December, 2005.

14  
15 Faith M. Mueller  
16 Major Faith M. Mueller

17 SUBSCRIBED AND SWORN to before me this 23<sup>rd</sup> day of December, 2005.



Thomas J. Mauerman  
THOMAS J. MAUERMAN (Printed Name)  
NOTARY PUBLIC in and for the State of  
Washington, residing at 1A Corn A /  
My Commission Expires: 4/15/06

AFFIDAVIT OF  
MAJOR FAITH M. MUELLER - 4

WIT plds fl22bb02 12/23/04

CARNEY  
BADLEY  
SPELLMAN

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EXHIBIT 4

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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, 446<sup>th</sup>  
Aeromedical Evacuation Squadron,  
McChord Air Force Base; and JAMES G.  
ROCHE, SECRETARY, DEPARTMENT  
OF THE AIR FORCE;

Defendants.

NO.

DECLARATION OF JULIA SCOTT

I, JULIA SCOTT, 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  
JULIA SCOTT - 1  
NO. 05-

CARNEY  
BADLEY  
SPELLMAN

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TEL (206) 622-8020

1           2.     I am a Major in the United States Air Force Reserve. I have been in the Air  
2     Force for almost 20 years, and have spent my entire career in the 446<sup>th</sup> Aeromedical  
3     Evacuation Squadron. I am a Flight Nurse Examiner and the Training Flight  
4     Commander.

5           3.     I know Major Witt very well. I have worked closely with her. She has an  
6     immense amount of knowledge that she can impart to new service members who receive  
7     training from her. She is very militarily professional, and very respectful of the chain of  
8     command. She knows her job backwards and forwards, and is incredibly knowledgeable.  
9     She is highly regarded within the unit. People go to her with problems because she solves  
10    them. In the field of aeromedical evacuation you have to be able to think quickly and to  
11    deal with rapidly changing critical situations. She has these qualities. The bottom line is  
12    that people like Major Witt save lives.

13          4.     I have flown on approximately 10 real world missions with her and I have  
14    seen what she can do.

15          5.     I have always known Major Witt to be highly professional, skilled and  
16    disciplined. I have the utmost trust and confidence in her abilities as a member of the  
17    U.S. Air Force and am honored to serve with her as a member of the 446<sup>th</sup> AES.

18          6.     I believe that Major Witt is a highly valuable, well-liked and well-respected  
19    member of our Unit. She also plays an important role in ensuring the good order, morale  
20    and cohesion of our Unit. She is highly skilled at managing people under her command,  
21    and knows how to be inclusive when she leads.

DECLARATION OF  
JULIA SCOTT - 2  
NO. 05-

CARNEY  
BADLEY  
SPELLMAN

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

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

9           9.     I have shared sleeping quarters with Major Witt. In October of 2003 during  
10 a mission to New Zealand I shared a room with her. There were no problems. I did not  
11 feel my privacy was infringed upon, and I would have no reservations about sharing  
12 living quarters with her again. I have always found Major Witt to be strong, professional  
13 and disciplined military officer. I felt fortunate to serve with her and I would welcome  
14 the opportunity to serve with her again.

15           10.    Major Witt never revealed her sexual preference to me. In 1998, she  
16 introduced me to Tiffany saying Tiffany was her roommate. After a while I put 2 and 2  
17 together. I did not really *know* that she was a lesbian, but I was relatively certain that she  
18 was.

19           11.    Then in July of 2004 Major Witt called me on a reserve weekend when I  
20 was at home in Vancouver, Washington. She told me she had had a surprise visit from  
21

DECLARATION OF  
JULIA SCOTT - 3  
NO. 05-

\_\_\_\_\_  
CARNEY  
BADLEY  
SPELLMAN

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1 JAG. She was crying and was very upset. She told me that her relationship with Tiffany  
2 was under investigation.

3 12. In November of 2004 she called me again and told me that she had been  
4 informed that she could no longer report for reserve duty, and that she could no longer  
5 participate in reserve duty for points or pay.

6 13. Our unit commander has never given the unit any explanation as to why  
7 Major Witt is no longer participating in reserve duty.

8 14. In my opinion, if command were to announce to the entire squadron that  
9 Major Witt was a lesbian, and that nevertheless the decision had been made to retain her  
10 in the Air Force, Major Witt's return to the 446<sup>th</sup> AES would not have any negative  
11 impact upon unit morale, discipline, or combat readiness. I personally would love to have  
12 her back, and I think over 99% of the people in the unit feel the same way.

13 15. I do not believe that Major Witt's continued presence in the U.S. Air Force,  
14 or specifically in our Unit, would jeopardize recruiting efforts. In fact, I am aware of the  
15 fact that Major Witt was selected to appear on various U.S. Air Force recruiting posters,  
16 brochures and other materials precisely because she exemplified the qualities that the U.S.  
17 Air Force sought in recruits. Four years ago my husband and I were at Travis Air Force  
18 Base and at the base visiting center I saw an Air Force recruiting pamphlet that had Major  
19 Witt's picture in it. I told everybody at the center that I knew her. I personally believe  
20 that Major Witt exemplifies the qualities that makes one a good and valuable member of  
21 the U.S. Air Force.

DECLARATION OF  
JULIA SCOTT - 4  
NO. 05-

CARNEY  
BADLEY  
SPELLMAN

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# EXHIBIT 5

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UNITED STATES DISTRICT COURT  
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MAJOR MARGARET WITT,  
  
Plaintiff,

vs.

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

NO. C06-5195 RBL  
  
DECLARATION OF MAJOR SUE  
SCHINDLER

I, Major Sue Schindler, 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 MAJOR SUE  
SCHINDLER - 1

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

1           2.       I am a Major in the United States Air Force. I have known Major Margaret  
2 Witt for approximately 7 years. I first met Major Witt when she joined the 446<sup>th</sup>  
3 Aeromedical Evacuation Squadron ("446<sup>th</sup>").

4           3.       I was on active duty in the U.S. Air Force from May 1979 to January 1984  
5 and have been stationed in Charleston, South Carolina and in Germany. On July 4, 1987,  
6 I joined the U.S. Air Force Reserves and have been a member of the 446<sup>th</sup> for 19 years. I  
7 am stationed at McChord Air Force Base in Tacoma, Washington. I am the Chief of  
8 Standards and Evaluations and my duties include ensuring that all members of the 446<sup>th</sup>  
9 are current in their training requirements and that they are properly and timely evaluated.

10           4.       In the performance of my duties, I regularly worked with Major Witt. We  
11 worked together in a number of ways. For example, we worked to prepare and present  
12 required trainings to members of the 446<sup>th</sup>.

13           5.       I have always known Major Witt to be highly professional, skilled and  
14 disciplined. I have the utmost trust and confidence in her abilities as a member of the  
15 U.S. Air Force and was honored to serve with her as a member of the 446<sup>th</sup>.

16           6.       I believe that Major Witt is a highly valuable, well-liked and well-respected  
17 member of our Unit. She also plays an important role in ensuring the good order, morale  
18 and cohesion of our Unit. I have always found that Major Witt has a calming effect on  
19 people and that this quality helps others with whom she works perform their duties  
20 effectively, efficiently and to the best of their abilities.  
21

DECLARATION OF MAJOR SUE  
SCHINDLER - 2

CARNEY  
BADLEY  
SPELLMAN

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TEL (206) 622-8020

AF000930

1           7.     Based on my personal observations of Major Witt I can say with  
2 confidence that her presence in the Air Force greatly enhances her Unit's combat  
3 efficiency and readiness. In short, Major Witt knows and performs her job well.

4           8.     I have routinely witnessed Major Witt interact with her superiors,  
5 subordinates and peers. I believe that Major Witt sustains strong working relationships  
6 with and has the respect of all of the members of the 446th, regardless of rank. In my  
7 experience, Major Witt performed her supervisory duties successfully and professionally.  
8 Major Witt's strong relationships helped maintain an effective chain of command in our  
9 Unit.

10           9.     I have shared confined quarters, such as showers and toilet facilities that  
11 allowed for minimal privacy with Major Witt. At no time did I feel uncomfortable with  
12 Major Witt's presence in these confined quarters or feel that my privacy was, in any way,  
13 impinged.

14           10.    I do not believe that Major Witt's presence in the U.S. Air Force or,  
15 specifically, in our Unit would jeopardize recruiting efforts. In fact, I understand that  
16 Major Witt was selected to appear on various U.S. Air Force recruiting posters, brochures  
17 and other materials because she exemplified the qualities that the U.S. Air Force sought in  
18 recruits. I have seen these recruiting posters, featuring Major Witt, on more than one  
19 occasion and as recently as May of 2004 when I attended a U.S. Air Force conference in  
20 Orlando, Florida. I also personally believe that Major Witt exemplifies the qualities that  
21 makes one a good and valuable member of the U.S. Air Force.

DECLARATION OF MAJOR SUE  
SCHINDLER - 3

\_\_\_\_\_  
CARNEY  
BADLEY  
SPELLMAN


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SEATTLE, WA 98104-5017  
FAX (206) 467-8215  
TEL (206) 622-8020

1           11. In all the time that I have known Major Witt and served with her, I have  
2 never seen or heard of anyone in the armed forces expressing any problem with her. I  
3 have never heard anyone complain about her. I have never heard anyone say that they  
4 wished she was not a member of their unit. I have never heard of any incident where she  
5 caused a discipline or morale problem.

6           12. In approximately October of 2004, Major Witt told me that she is being  
7 discharged because of allegations that she is homosexual. Although Major Witt has never  
8 told me that she is homosexual, I have long assumed that she was a lesbian. Assuming  
9 she is a lesbian, I can say without reservation that this fact makes absolutely no difference  
10 to me. In my opinion, if command were to announce that Major Witt was lesbian and that  
11 she was remaining in the service, her continued presence in the Air Force would not have  
12 any negative impact upon our unit's morale, discipline, or combat readiness, and no  
13 negative impact whatsoever upon me and my desire to continue to work with her.

14           13. In sum, I firmly believe that discharging Major Witt from the U.S. Air  
15 Force would be detrimental. Moreover, I believe that our Unit's morale, cohesion and  
16 good order would be severely jeopardized if Major Witt is discharged.

17           DATED this 31 day of May, 2005 in COOS County, state of Oregon.

18  
19  
20             
21           Major Sue Schindler

DECLARATION OF MAJOR SUE  
SCHINDLER - 4

\_\_\_\_\_

CARNEY  
BADLEY  
SPELLMAN

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700 FIFTH AVENUE, #5800  
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FAX (206) 467-8215  
TEL (206) 622-8020



EXHIBIT 6

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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT TACOMA

10 MAJOR MARGARET WITT,

11 Plaintiff,

12 vs.

13 UNITED STATES DEPARTMENT OF  
14 THE AIR FORCE; COLONEL MARY L.  
15 WALKER, Commander, 446<sup>th</sup>  
16 Aeromedical Evacuation Squadron,  
17 McChord Air Force Base; and JAMES G.  
18 ROCHE, SECRETARY, DEPARTMENT  
19 OF THE AIR FORCE;

20 Defendants.

NO. C06-5195 RBL

DECLARATION OF SHARON  
CARLSON

19 I, Sharon Carlson, do hereby declare under penalty of perjury under the laws of the  
20 United States of America, that the following facts are true and correct:

21 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.

1           2.     I am a Major in the United States Air Force. I have known Major  
2 Margaret Witt for approximately 7 years. I first met Major Witt when she joined the 446<sup>th</sup>  
3 Aeromedical Evacuation Squadron ("446<sup>th</sup>" or "Squadron").

4           3.     I was on active duty in the U.S. Air Force from 1985 to 1988 and was  
5 stationed at Travis Air Force Base in California and Misawa Air Force Base in Japan. In  
6 1993, I joined the U.S. Air Force Reserves and have been a member of the 446<sup>th</sup> for 11  
7 years. I am stationed at McChord Air Force Base in Tacoma, Washington. I am a Flight  
8 Nurse Instructor and my duties include instructing new nurses in the 446<sup>th</sup> and training  
9 current members of the 446<sup>th</sup> in various flight duty training requirements.

10           4.     In the performance of my duties, I regularly worked with Major Witt. We  
11 worked together in a number of ways. For example, Major Witt and I worked together to  
12 design and present required trainings to members of the 446<sup>th</sup> to ensure that all U.S. Air  
13 Force training requirements were fulfilled by members of the 446<sup>th</sup>.

14           5.     I have always known Major Witt to be highly professional, skilled and  
15 disciplined. Major Witt loved being a member of the U.S. Air Force and was a very  
16 knowledgeable resource for me and others in the 446<sup>th</sup>. At times when new policies or  
17 procedures were put into effect, I would seek out Major Witt for help in explaining those  
18 changes because I had confidence in her knowledge and abilities. I have the utmost trust  
19 and confidence in her abilities as a member of the U.S. Air Force and am honored to serve  
20 with her as a member of the 446<sup>th</sup>.

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. For example, Major Witt is very good at keeping her colleagues  
4 and subordinates on task, even when missions are difficult or stressful. Major Witt  
5 always pushes others to do their best.

6           7.       Based on my personal observations of Major Witt I can say with  
7 confidence that her presence in the Air Force greatly enhances her Squadron's combat  
8 efficiency and readiness. In my experience, Major Witt is a calm and strong leader who  
9 helps her Squadron succeed in any mission they face. For example, I once was on a  
10 training mission with Major Witt in Hawaii. The airplane on which we were to train did  
11 not have the required oxygen tanks on board. In order to ensure the safety of all, it is  
12 critical that sufficient amounts of oxygen be available. Major Witt immediately  
13 recognized that the necessary oxygen was not on board, identified the personnel with  
14 whom to speak in order to obtain the necessary equipment and secured sufficient amounts  
15 of oxygen tanks for the aircraft so that the mission could be completed.

16           8.       I have routinely witnessed Major Witt interact with her superiors,  
17 subordinates and peers. I believe that Major Witt sustains strong working relationships  
18 with and has the respect of all of the members of our Squadron, regardless of rank. In my  
19 experience, Major Witt performs her supervisory duties successfully and professionally.  
20 Major Witt's strong relationships help maintain an effective chain of command in our  
21 Squadron.

1           9.     Although I have not served with Major Witt on active duty, I would  
2 welcome the opportunity to do so because I believe that she is an excellent and valuable  
3 member of the U.S. Air Force.

4           10.    I have not shared confined sleeping and dressing areas, showers or toilet  
5 facilities with Major Witt in barracks that allowed for minimal privacy. However, I am  
6 completely comfortable in doing so and would not feel that my privacy would, in any  
7 way, be impinged by sharing these confined quarters with Major Witt

8           11.    I do not believe that Major Witt's presence in the U.S. Air Force or,  
9 specifically, in our Unit would jeopardize recruiting efforts. In fact, I have seen various  
10 U.S. Air Force recruiting posters, brochures and other materials in which Major Witt was  
11 pictured and understand that she was selected to appear on these recruiting materials  
12 because she exemplifies the qualities that the U.S. Air Force sought in recruits. I also  
13 personally believe that Major Witt exemplifies the qualities that makes one a good and  
14 valuable member of the U.S. Air Force.

15           12.    In all the time that I have known Major Witt and served with her, I have  
16 never seen or heard of anyone in the armed forces expressing any problem with her. I  
17 have never heard anyone complain about her. I have never heard anyone say that they  
18 wished she was not a member of their unit. I have never heard of any incident where she  
19 caused a discipline or morale problem.  
20  
21

DECLARATION OF SHARON CARLSON - 4

CARNEY  
BADLEY

LAW OFFICES  
A PROFESSIONAL SERVICE CORPORATION  
700 FIFTH AVENUE, #5800  
SEATTLE, WA 98104-5017

EX-10000937

1           13. No one has told me why Major Witt is being discharged. Although no one  
2 has told me why, I suspect that she is being discharged for either homosexual status or  
3 acts.

4           14. However, one weekend when I was traveling to Hawaii for duty, I stopped  
5 at Travis Air Force Base. I had recently learned that changes were being implemented to  
6 our flight requirements and I called Major Witt to ask her about this change in policy.  
7 When I spoke to her, Major Witt was upset. I asked her what was wrong and she told me  
8 that Commander Walker had called her into a conference room at McChord Air Force  
9 Base. In the conference room, a JAG was there and the JAG asked Major Witt about her  
10 relationship with Tiffany. I had previously met Tiffany and believed that she and Major  
11 Witt were engaged in a romantic relationship.

12           15. I have long assumed that Major Witt is a lesbian. I can say without  
13 reservation that this fact makes absolutely no difference to me. In my opinion, if  
14 command were to announce to everyone on base that she was lesbian and that she was  
15 remaining in the service, her continued presence in the Air Force would not have any  
16 negative impact upon her unit morale, discipline, or combat readiness, and no negative  
17 impact whatsoever upon me. In fact, I believe that the morale of the member of the 446<sup>th</sup>  
18 has been severely damaged because Major Witt is not allowed to continue to serve with  
19 our Squadron. I believe that the members of the 446<sup>th</sup> would be very happy and  
20 supportive if Major Witt was allowed to return to our Squadron and continue her service.  
21

1 It would still be my strong desire to have her remain in the service and to continue to  
2 work with her.

3 14. In sum, I firmly believe that discharging Major Witt from the U.S. Air  
4 Force would be detrimental. Moreover, I believe that our Unit's morale, cohesion and  
5 good order would be severely jeopardized even further if Major Witt is discharged.  
6

7 DATED this 24 day of February, 2005.  
8

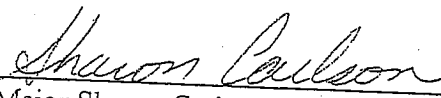
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Major Sharon Carlson

EXHIBIT 7



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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, 446<sup>th</sup>  
Aeromedical Evacuation Squadron,  
McChord Air Force Base; and JAMES G.  
ROCHE, SECRETARY, DEPARTMENT  
OF THE AIR FORCE;

Defendants.

NO. C06 5195 RBL

DECLARATION OF MASTER  
SERGEANT JILL BRINKS

I, Master Sergeant Jill Brinks, 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 MASTER SERGEANT  
JILL BRINKS - 1

CARNEY  
BADLEY

SPRETTMAN

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

AF000941

1           2.     I am a Master Sergeant in the United States Air Force. I have known  
2 Major Margaret Witt for approximately 16 years. I first met Major Witt when she joined  
3 the 446<sup>th</sup> Aeromedical Evacuation Squadron ("446<sup>th</sup>").

4           3.     I have been in the U.S. Air Force for 18 years and have been a member of  
5 the 446<sup>th</sup> for that entire time. I am stationed at McChord Air Force Base in Tacoma,  
6 Washington. I am an Aeromedical Evacuation Technician and my duties include  
7 assisting with the in-flight care of patients.

8           4.     In the performance of my duties, I regularly worked with Major Witt. We  
9 worked together in a number of ways, including routinely working together on the same  
10 medical team during training flights. In fact, I have flown with Major Witt on more than  
11 50 training flights

12           5.     I have always known Major Witt to be highly professional, skilled and  
13 disciplined. I have the utmost trust and confidence in her abilities as a member of the  
14 U.S. Air Force and am honored to serve with her as a member of the 446th. In my  
15 opinion and experience, Major Witt is one of the most dependable, knowledgeable and  
16 well-prepared members of our Unit.

17           6.     I believe that Major Witt is a highly valuable, well-liked and well-respected  
18 member of our Unit. In fact, Major Witt's opinion and experience were valued so highly  
19 that, when she spoke, others stopped to listen because Major Witt was viewed as such a  
20 valuable member and resource. Others, including me, often went to Major Witt for  
21 guidance in difficult situations because she was a natural leader, had a good

DECLARATION OF MASTER SERGEANT  
JILL BRINKS - 2

CARNEY  
BADLEY

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FAX (206) 467-8215

AF000942

1 understanding of the "big picture" and knew how to bring out the best in other members  
2 of our Unit. For these reasons, Major Witt played an important role in ensuring the good  
3 order, morale 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. I believe that Major Witt sustains strong working relationships  
9 with and has the respect of all of the members of our Unit, regardless of rank. In my  
10 experience, Major Witt performed her supervisory duties successfully and professionally.  
11 I have witnessed Major Witt identify and correct others' mistakes and she is able to do so  
12 in a tactful manner which does not cause embarrassment or resentment. Major Witt's  
13 strong relationships helped maintain an effective chain of command in our Unit.

14 9. I have not shared confined sleeping and dressing areas, showers or toilet  
15 facilities with Major Witt in barracks that allowed for minimal privacy. However, I am  
16 completely comfortable in doing so and would not feel that my privacy would, in any  
17 way, be impinged by sharing these confined quarters with Major Witt.

18 10. I do not believe that Major Witt's presence in the U.S. Air Force or,  
19 specifically, in our Unit would jeopardize recruiting efforts. In fact, I understand that  
20 Major Witt was selected to appear on various U.S. Air Force recruiting posters, brochures  
21 and other materials because she exemplified the qualities that the U.S. Air Force sought in

DECLARATION OF MASTER SERGEANT  
JILL BRINKS - 3

CARNEY  
BADLEY

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SEATTLE, WA 98104-5017  
FAX (206) 467-8215  
AF000943

1 recruits. I have seen the recruiting posters which feature Major Witt and also personally  
2 believe that Major Witt exemplifies the qualities that makes one a good and valuable  
3 member of the U.S. Air Force.

4 11. In all the time that I have known Major Witt and served with her, I have  
5 never seen or heard of anyone in the armed forces expressing any problem with her. I  
6 have never heard anyone complain about her. I have never heard anyone say that they  
7 wished she was not a member of their unit. I have never heard of any incident where she  
8 caused a discipline or morale problem.

9 12. No one has told me why Major Witt is being discharged. Although no one  
10 has told me why, I suspect that she is being discharged for either homosexual status or  
11 acts. Although she has never said a word to me about her sexual orientation or sexual  
12 conduct, I have long assumed that she was a lesbian. Assuming she is a lesbian, I can say  
13 without reservation that this fact makes absolutely no difference to me. In my opinion, if  
14 command were to announce that Major Witt was lesbian and that she was remaining in  
15 the service, her continued presence in the Air Force would not have any negative impact  
16 upon our unit's morale, discipline, or combat readiness, and no negative impact  
17 whatsoever upon me and my desire to continue to work with her.

18 13. In sum, I firmly believe that discharging Major Witt from the U.S. Air  
19 Force would be detrimental. Moreover, I believe that our Unit's morale, cohesion and  
20 good order would be severely jeopardized if Major Witt is discharged. In fact, because  
21 Major Witt is such an incredible asset to the 446<sup>th</sup>, I believe that our Unit has already been

DECLARATION OF MASTER SERGEANT  
JILL BRINKS - 4

CARNEY  
BADLEY

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SEATTLE, WA 98104-5017  
FAX (206) 467-8215  
AF000944

1 negatively impacted in a significant way because the U.S. Air Force is seeking to  
2 discharge Major Witt.

3 DATED this 21 day of May, 2005 in 2005 County, state of  
4 Washington.

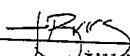
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8 Master Sergeant Jill Brinks  
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EXHIBIT 8

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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; et al.;

Defendants.

NO.

DECLARATION OF MAJOR ANNIE  
THOMAS

I, Major Annie Thomas, 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 have known Major Margaret Witt for approximately nine years. I first met Major Witt in the U.S. Air Force Reserves.

DECLARATION OF MAJOR ANNIE  
THOMAS - 1

CARNEY  
BADLEY

LAW OFFICES  
A PROFESSIONAL SERVICE CORPORATION  
701 FIFTH AVENUE, #3600  
SEATTLE, WA 98104-7010  
FAX (206) 622-8983

AF000947

1           3.     I have been a member of the U.S. Air Force Reserves for 18 years and am  
2 stationed at McChord Air Force Base in Tacoma, Washington. My title is Chief of Standards  
3 and Evaluations for the 446 Aeromedical Evacuation Squadron ("446<sup>th</sup>). I am also a Flight  
4 Nurse for the 446<sup>th</sup>. As part of my duties, I fly into Combat Air Support Hospitals and attend  
5 to wounded soldiers while they are being transported out to other medical facilities. I also  
6 am responsible for managing the evaluations and testing of other Flight Nurses and  
7 Technicians in the 446<sup>th</sup>.

8           4.     In the performance of my duties, I regularly worked with Major Witt. In fact,  
9 I was Major Witt's assistant for a period of time and we worked together constantly. We  
10 worked together in a number of ways, including evaluating and testing other Flight Nurses  
11 and Technicians. Through my work with her, I have come to know Major Witt very well.

12           5.     I have always known Major Witt to be highly professional, skilled and  
13 disciplined. I have the utmost trust and confidence in her abilities as a member of the U.S.  
14 Air Force and am honored to serve with her as a member of the 446<sup>th</sup>.

15           6.     I believe that Major Witt is a highly valuable, well-liked and well-respected  
16 member of our squadron. She also plays an important role in ensuring the good order, morale  
17 and cohesion of the 446<sup>th</sup>. For example, Major Witt is a great leader and communicator. She  
18 makes sure that all tasks are properly completed without micro-managing others and is on top  
19 of every aspect of her work.

20           7.     Based on my personal observations of Major Witt I can say with confidence  
21 that her presence in the U.S. Air Force greatly enhances our squadron's combat efficiency  
and readiness because she is an excellent flight nurse.

DECLARATION OF MAJOR ANNIE  
THOMAS - 2

\_\_\_\_\_  
CARNEY  
BADLEY

LAW OFFICES  
A PROFESSIONAL SERVICE CORPORATION  
701 FIFTH AVENUE, #3600  
SEATTLE, WA 98104-7010  
EA V (206) 477-8087

AF000948



1           8.     I have routinely witnessed Major Witt interact with her superiors, subordinates  
2 and peers. I believe that Major Witt sustains strong working relationships with and has the  
3 respect of all of the members of our squadron, regardless of rank. In my experience, Major  
4 Witt performs her supervisory duties successfully and professionally. Major Witt's strong  
5 relationships help maintain an effective chain of command in our squadron.

6           9.     I have not served in active duty with Major Witt, but based upon my  
7 experience with her, I would have absolutely no hesitation in doing so. In fact, I would  
8 welcome the opportunity to serve with Major Witt and would fly with her at any time under  
9 any circumstances

10          10.    I have not shared confined sleeping and dressing areas, showers or toilet  
11 facilities with Major Witt in barracks that allowed for minimal privacy. However, I am  
12 completely comfortable in doing so and would not feel that my privacy would, in any way, be  
13 impinged by sharing these confined quarters with Major Witt.

14          11.    I do not believe that Major Witt's presence in the U.S. Air Force or,  
15 specifically, in the 446th would jeopardize recruiting efforts. In fact, when I was at Maxwell  
16 Air Force Base in Montgomery, Alabama I saw numerous U.S. Air Force recruiting posters  
17 on which Major Witt was selected to appear. I believe that the U.S. Air Force chose Major  
18 Witt to appear on these recruiting posters because she exemplifies the qualities that the U.S.  
19 Air Force seeks in recruits. I also personally believe that Major Witt exemplifies the qualities  
20 that makes one a good and valuable member of the U.S. Air Force.

21          12.    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 have never

DECLARATION OF MAJOR ANNIE  
THOMAS - 3

CARNEY  
BADLEY

LAW OFFICES  
A PROFESSIONAL SERVICE CORPORATION  
701 FIFTH AVENUE, #3600  
SEATTLE, WA 98104-7010  
FAX (206) 499-9887

1 heard anyone complain about her. I have never heard anyone say that they wished she was  
2 not a member of their squadron. I have never heard of any incident where she caused a  
3 discipline or morale problem. To the contrary, everyone I know loves Major Witt and highly  
4 values her as a member of the 446<sup>th</sup>.

5 13. In approximately November of 2004, Col. Moore-Harbert told me that I was  
6 the "new Chief of Standards and Evaluations" because Major Witt was "no longer there."  
7 However, I have never been directly told why Major Witt is being discharged. Regardless, I  
8 suspect that Major Witt is being discharged because she is accused of being a lesbian.  
9 Although she has never said a word to me about her sexual orientation or sexual conduct, I  
10 have long assumed that Major Witt was a lesbian. Assuming that she is a lesbian, I can say  
11 without reservation that this fact makes absolutely no difference to me. In my opinion, if  
12 command were to announce to everyone on base that Major Witt was lesbian and that she was  
13 remaining in the service, her continued presence in the Air Force would not have any  
14 negative impact upon our squadron's morale, discipline, or combat readiness, and no negative  
15 impact whatsoever upon me personally. It would still be my strong desire to have her remain  
16 in the service and to continue to work with her.

17 14. In sum, I firmly believe that discharging Major Witt from the U.S. Air Force  
18 would be detrimental. Moreover, I believe that our squadron's morale, cohesion and good  
19 order have already been damaged because Major Witt has been prohibited from participating  
20 with the 446<sup>th</sup> for the past year and would be severely jeopardized if Major Witt is  
21 discharged.

DATED this 10 day of April, 2006.

DECLARATION OF MAJOR ANNIE  
THOMAS - 4

CARNEY  
BADLEY

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SEATTLE, WA 98101-3600

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*Annie Thomas*

Major Annie Thomas

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DECLARATION OF MAJOR ANNIE  
THOMAS

CARNEY  
BADLEY

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AF000951

EXHIBIT 9

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8 UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
9 AT TACOMA

10 MAJOR MARGARET WITT,

11 Plaintiff,

12 vs.

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

15 Defendants.

NO.

DECLARATION OF MAJOR VINCE  
ODA

16 I, Major Vince Oda, do hereby declare under penalty of perjury under the laws of the  
17 United States of America, that the following facts are true and correct:

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

20 2. I am a Major in the United States Air Force. I have known Major  
21 Margaret Witt for approximately 6 years. I first met Major Witt when she joined the 446<sup>th</sup>  
Aeromedical Evacuation Squadron ("446<sup>th</sup>").

DECLARATION OF MAJOR  
VINCE ODA - 1

CARNEY  
BADLEY  
SPELLMAN

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