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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 RBL
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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1 2. I am a Major in the United States Air Force Reserve. I have been in the Air
2 ^{RESERVE}
3 Force for ~~almost~~ 20 years, and have spent my entire career in the 446th Aeromedical
4 Evacuation Squadron. I am a Flight Nurse Examiner and the Training Flight
5 Commander.

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

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

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

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

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

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 446th 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.

