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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 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  
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ORIGINAL

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

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**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. 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

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**CARNEY  
BADLEY  
SPELLMAN**

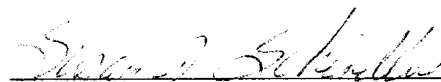
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1           11. In all the time that I have known Major Witt and served with her, I have  
2 never seen or heard of anyone in the armed forces expressing any problem with her. I  
3 have never heard anyone complain about her. I have never heard anyone 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 21 day of May, 2005 in COOS County, state of Oregon.

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20   
21 Major Sue Schindler

DECLARATION OF MAJOR SUE  
SCHINDLER – 4

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**CARNEY**  
**BADLEY**  
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