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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 SHARON
CARLSON

I, Sharon Carlson, 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 SHARON CARLSON – 1

**CARNEY
BADLEY
SPELLMAN**

LAW OFFICES
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SEATTLE, WA 98104-5017
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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 446th
3 Aeromedical Evacuation Squadron (“446th” 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 446th 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 446th and training
9 current members of the 446th 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 446th to ensure that all U.S. Air
13 Force training requirements were fulfilled by members of the 446th.

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 446th. 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 446th.
21

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.
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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.

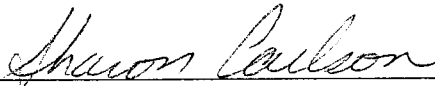
4 14. However, one weekend when I was traveling to Hawaii for duty, I stopped
5 at Travis Air Force Base. I had recently learned that changes were being implemented to
6 our flight requirements and I called Major Witt to ask her about this change in policy.
7 When I spoke to her, Major Witt was upset. 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 446th
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 446th 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
9 
10 Major Sharon Carlson