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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 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
SPELLMAN

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A PROFESSIONAL SERVICE CORPORATION
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SEATTLE, WA 98104-5017
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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 446th Aeromedical Evacuation Squadron (“446th”).

4 3. I have been in the U.S. Air Force for 18 years and have been a member of
5 the 446th 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

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JILL BRINKS – 2

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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

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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 446th, I believe that our Unit has already been

DECLARATION OF MASTER SERGEANT
JILL BRINKS - 4

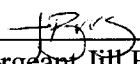
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negatively impacted in a significant way because the U.S. Air Force is seeking to discharge Major Witt.

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


Master Sergeant Jill Brinks

DECLARATION OF MASTER SERGEANT
JILL BRINKS - 5

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