

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21

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. 006-5195 RBL

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

WIT004 plds hd044201 4/10/06

**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

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 446th.

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 446th. 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  
SPELLMAN**

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

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  
SPELLMAN**

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

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  
SPELLMAN**

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21



---

Major Annie Thomas

DECLARATION OF MAJOR ANNIE  
THOMAS – 5

WIT004 plds hd044201 4/10/06

---

**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