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THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

MAJOR MARGARET WITT,

Plaintiff,

Case No. C06-5195-RBL

v.

DECLARATION OF DAVID POULSEN

UNITED STATES DEPARTMENT OF THE ARMY
AND THE AIR FORCE; et al.,

Defendants.

I, DAVID POULSEN, 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 DAVID POULSEN -- 1
Case No. C06-5195-RBL

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(206) 624-2184

1 2. I enlisted in the Air Force Reserve in 1968. I joined the 40th/446th AES in 1973
2 and subsequently served 36 years in the squadron. In 1993, I began working as a full-time Air
3 Reserve Technician, which is a five day a week civilian position on base. I retired in June 2009
4 as a Senior Master Sergeant.

5 3. I met Major Witt when she joined the unit and served with her until she left the
6 unit in 2004. During her last few months of service, we both worked in Aircrew Standardization
7 and Evaluation (StanEval). Since Major Witt was the Chief of StanEval at that time, she wrote
8 one performance report for me. One strong memory I have is that she offered to spend extra time
9 at McChord during the week in order to complete the report. I appreciated the time and thought
10 that she put into it.

11 4. I don't recall how I learned of Major Witt's suspension, but I remember being
12 aware that she was gone and learning of her suspension at some point later. I did not discuss her
13 suspension with other members but I overheard talk in the squadron, so I know that it affected
14 some members deeply. I felt that Major Witt's suspension was a loss to the unit because she was
15 a StanEval caliber professional and a great nurse.

16 5. I never saw any conduct that would indicate that Major Witt is a lesbian and I try
17 not to make assumptions, but rather deal only with facts. I personally never talked about matters
18 of sexual orientation, however every now and then I would hear members engaged in
19 conversation about a presumed gay or lesbian servicemember. I did not give sexual orientation
20 much thought because nobody called attention to it. A member's sexual orientation makes no
21 difference to me so long as the member performs his or her job.

22 6. Prior to Major Witt joining the unit, there were a couple other members in the
23 squadron who others alluded to as being gay or lesbian. I heard rumors of lesbian
24 servicemembers living together, and I know that some members in the unit assumed a male
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26

DECLARATION OF DAVID POULSEN -- 2
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1 member was gay based on his mannerisms. Either way, it did not matter to me whether these
2 members were gay because they performed well on the job and did not call attention to their
3 sexual orientation.


4 7. I would say that the unit attitude towards gay and lesbian members was tolerant.
5 I never heard anyone make negative comments about gay or lesbian servicemembers, or say that
6 they did not want to serve with them.

7 8. I deployed overseas in 1991 for Desert Storm. On deployment, I never heard
8 anyone make negative comments regarding gay or lesbian servicemembers.

9 9. My retirement ceremony was held in July 2009 on base. I wanted to invite Major
10 Witt to my ceremony so I asked Colonel Moore-Harbert whether I could do so, since I knew that
11 Major Witt was in the news and I did not want any ramifications. Colonel Moore-Harbert did
12 not express disapproval. Instead she told me that it was my ceremony and I could invite who I
13 wanted.
14

15 10. Knowing that Major Witt is a lesbian now does not change what I think of her as a
16 professional officer. Her sexual orientation was never an issue. Nor would my opinion of her
17 change if I learned that she is in a long-term relationship with a woman and the relationship
18 started when the woman was technically still married. Major Witt was a positive force and
19 contributor to the betterment of the squadron. Based on my experience with her over the years, I
20 believe that her reinstatement would be beneficial to the unit.
21

22
23 DATED this 27th day of May, 2010, at Lakewood, Washington.

24
25 
26 David Poulsen

DECLARATION OF DAVID POULSEN -- 3
Case No. C06-5195-RBL

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Peter J. Phipps	<u>Peter.phipps@usdoj.gov</u>
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/s/Lily T. Laemmle
LILY T. LAEMMLE

NO. C06-5195 RBL

**CARNEY
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