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Transcript of General Christopher Walker

Date: August 7, 2024

Case: Students For Fair Admissions -v- The United States Naval Academy, et al.

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

STUDENTS FOR)
FAIR ADMISSIONS,)

Plaintiff,)

v.)

THE UNITED STATES)
NAVAL ACADEMY, et al.,)

Defendants.)

Case No. 1:23-CV-02699
Hon. Richard D. Bennett

Deposition of

GEN. CHRISTOPHER SEAN WELLESLEY WALKER

Washington, DC

August 7, 2024

9:04 a.m. EST

Job No.: 547343

Pages: 1 - 282

Transcribed by: Mary J. Butenschoen

1 Deposition of GEN. CHRISTOPHER SEAN WELLESLEY
2 WALKER, held at the offices of:

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U.S. Department of Justice

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Civil Division, Federal Programs Branch

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Pursuant to agreement, before Jamie Ogihara,

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CER, Notary Public in and for the District of

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Columbia.

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A P P E A R A N C E S

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1 P R O C E E D I N G S

2 Whereupon,

3 THE REPORTER: Please raise your right
4 hand.

5 GENERAL CHRISTOPHER SEAN WELLESLEY WALKER

6 being first duly sworn or affirmed to tell the
7 truth, the whole truth, and nothing but the truth,
8 as examined as follows:

9 EXAMINATION BY COUNSEL FOR THE DEFENDANTS

10 BY MR. ROBINSON:

11 Q Good morning, General Walker.

12 A Good morning.

13 Q My name is John Robinson. I'm a
14 lawyer with the Department of Justice.

15 A Excellent.

16 Q I represent the defendants in this
17 case, including the Naval Academy and the Department
18 of Defense.

19 A All right.

20 Q With me at counsel table is my
21 colleague, Josh Gardner.

22 A Good morning.

1 Q I'll give your attorneys a chance to
2 introduce themselves now.

3 MR. CONNOLLY: Michael Connolly with
4 Consovoy McCarthy, and with me is James Hasson with
5 Consovoy McCarthy.

6 BY MR. ROBINSON:

7 Q Could you please state your full name
8 for the record.

9 A Christopher Sean Wellesley Walker.
10 "Sean" is spelled the Irish way.

11 Q Are you currently employed?

12 A I am retired receiving pension from
13 the U.S. Government, and I -- though I'm very busy
14 with a lot of different boards, those are all
15 voluntary.

16 Q Congratulations on your retirement.

17 A Thank you so kindly.

18 Q What boards are you involved in?

19 A I am the -- I'm on the Board of
20 Governors for the Civil Air Patrol nationally. I'm
21 the Chair of the Clarksburg Classic Academy. It's
22 a -- it's a charter prep school. I'm the chair of

1 that board.

2 I'm the Chair of the Board for the
3 Virtual Preparatory Academy of West Virginia. I'm a
4 Member of the Board of the Clay Center for the Arts
5 and Sciences of West Virginia, and I'm also on the
6 Foun- -- the Board of the Foundation for Bridge
7 Valley Community and Technical College.

8 Q Have you ever been deposed before?

9 A No, not in a -- not in the court type
10 of -- for invest- -- other investigations, I've been
11 brought under questioning, but yes.

12 Q All right. What kinds of
13 investigations?

14 A Either 15-6's or command --
15 commander-directed investigations in the military.

16 Q Have you ever been a witness at trial?

17 A I have not.

18 Q Have you ever testified before
19 Congress?

20 A I have not.

21 Q Okay. Just a few quick ground rules
22 today. I won't belabor them.

1 First of all, most importantly, if at
2 any point you'd like to take a break today, just let
3 me know. That goes for the court reporter; counsel
4 as well. I'll try to take a break every hour or so.

5 A Okay.

6 Q But just let me know.

7 There's a court reporter here,
8 obviously. I'm going to try my best to speak slowly
9 and clearly. I appreciate your answers. So far
10 you've been speaking slowly and clearly.

11 A I'll try to enunciate.

12 Q We'll try to enunciate. We'll try not
13 to talk over each other and get a clean record.

14 And then last, Mr. Connolly might
15 object today. Even if he objects, you should
16 answer --

17 A Okay.

18 Q -- the question.

19 Okay. General Walker, did you do
20 anything to prepare for this deposition today?

21 A Yes, I did a lot of study. I -- I
22 went back and read what I'd written in my report and

1 rebuttal report. I also went back and looked at
2 some of the sources that the -- the defendants'
3 witnesses used and also some of the sources I used.
4 I wanted to make sure that I wouldn't be bumbling
5 here.

6 Q Are there any other documents you
7 recall reviewing in preparation for the deposition,
8 aside from your reports and those studies or sources
9 that you just referenced?

10 A Well, in the course of my daily habit,
11 in the mornings I'm always reading RealClearDefense
12 Early Bird and also other different journals dealing
13 with defense. And as well as all sorts of news
14 sources from around the world. And I can safely say
15 that every once in a while something will come up
16 that is somewhat relevant to this case.

17 Q Do you recall specifically reading
18 anything in those news sources that you thought bore
19 on this case?

20 A One I came **cross**, there's an
21 organization called STARRS, S-T-A-R-R-S, and they
22 are -- they are an organization that mainly

1 concentrates on what happens at the Air Force
2 Academy, but they also publish things that the
3 Calvert Task Group, which is a group of United
4 States Naval Academy grads put out, and then there's
5 another one called the MacArthur Society, and all of
6 those organizations are kindred spirits. And they
7 put out different articles on what's happening in
8 the military and how it's affecting readiness, how
9 it's affecting morale and such.

10 Q And you read something by that STARRS
11 group, about that STARRS group, that touched on
12 these issues?

13 A By the STARRS group and -- and the
14 MacArthur group and the -- and the Calvert Task
15 Group as well.

16 Q Just so I understand, this was one
17 article or one article written by each organization?

18 A So as you go through their website,
19 they'll have new articles coming out, but then on
20 the -- on the side of the web page, so past
21 articles, and I go "that looks interesting." And
22 some of those articles will be from the Calvert Task

1 Group, some will be from the MacArthur Society, but
2 they're -- they're all like-minded in wanting the
3 service academies to produce warriors and stop
4 worrying about other things.

5 Q So which article did you see that you
6 thought was relevant to the issues in this case?

7 A There was -- there was one talking
8 about what's happening at the Air Force Academy now
9 and how they have, they're called, the Purple Ropes
10 by the cadets, and I mentor lots of cadets. I
11 mentor midshipmen as well; I mentor cadets at West
12 Point. But at the Air Force Academy they call them
13 the Purple Ropes, and they -- and they wear a rope
14 across one of their shoulders, and they -- one can
15 liken them to the political commissars that -- that
16 Soviet Union used to have. They are -- they are
17 meant to patrol and listen to what people are
18 saying, and if they -- and if people say something
19 that is not politically correct, they report them.

20 And I said, "What the heck this?" And
21 that's something that -- that that organization
22 ~~is --~~ is concerned about and wants to bring forward

1 to senior leadership.

2 Q You said that you reviewed certain
3 sources that were relied on by defendants' experts
4 in this case.

5 A Uh-huh.

6 Q Do you recall what those sources were?

7 A One is -- well, so Lyall, his book,
8 because I said, all right; because that is one that
9 I said, "Well, maybe there is some data to back up
10 what they're saying, and he claims it is, and so let
11 me read through his book and see what I find." And
12 so I -- I spent the money on that to get it.

13 But others are -- other things that
14 I've read were documents provided by the United
15 States Naval Academy to the plaintiff's lawyers. I
16 looked through those as well. One was a study by
17 Boston Consulting Group. Various studies that they
18 put forward to support their claims.

19 Q Did you meet with counsel for the
20 plaintiff in preparation for this deposition today?

21 MR. CONNOLLY: Objection. You may
22 answer the question, but I would remind the witness

1 not to disclose the particulars of our
2 communications.

3 THE WITNESS: Yes.

4 BY MR. ROBINSON:

5 Q When did you meet?

6 A Yesterday.

7 Q Did you meet anytime other than
8 yesterday?

9 A We talked by phone other than that,
10 other than yesterday.

11 Q Okay. For how long did you meet
12 yesterday?

13 A That was about five and a half hours.

14 Q Okay. Have you talked about this
15 deposition with anyone else leading up to today
16 aside from counsel for the plaintiff?

17 A I told my girlfriend where I was
18 going.

19 Q Okay. I'm marking as Exhibit 1 your
20 expert report in this case.

21 (Deposition Exhibit 1 marked)

22 THE WITNESS: Thank you so kindly.

1 BY MR. ROBINSON:

2 Q General Walker, this does appear to be
3 your expert report in this case, correct?

4 A From what I see, yes.

5 Q Would you please turn to page 2.

6 A I assume you're meaning number 2 and
7 not Roman numeral II.

8 Q Correct. It says here that you served
9 as Senior Military Advisor to the Secretary of the
10 Air Force's Office of Diversity and Inclusion.

11 Did I read that correctly?

12 A You read it perfectly.

13 Q Was this position at the Pentagon?

14 A It was.

15 Q Why did you take this job?

16 A Because I was asked to take it.

17 Q Who asked you to take it?

18 A The Principal Deputy Assistant
19 Secretary of the Air Force for Manpower & Reserve
20 Affairs, John Fedrigo.

21 Q When was this?

22 A This was early February of 2021.

1 Q And just continuing to read the bottom
2 of page 2 onto page 3, you say that your duties
3 included providing strategic advice and guidance to
4 the International Guard regarding the implementation
5 of Air Force diversity and inclusion initiatives
6 providing senior leader support to the Office of
7 Diversity and Inclusion and identifying and
8 recommending changes to policies and procedures.

9 So without revealing any internal
10 agency deliberations, can you speak at a high level
11 about the initiatives you worked on in this
12 position?

13 MR. CONNOLLY: Objection, form.

14 THE WITNESS: So as an advisor, I did
15 not have decision making authority.

16 Now, the -- that office, the Secretary
17 of the Air Force Office of Diversity and Inclusion
18 has now been melded into SAF ~~and~~ MR, the Secretary
19 of the Air Force Manpower & Reserve Affairs, and
20 they call it the Office of Resilience with Marianne
21 Malizia still being the Chief Diversity Officer for
22 the Air Force.

1 But that being said at the time that
2 office had Marianne Malizia as the -- before she
3 came they had an acting, but she -- but she was the
4 one who was coming to be the named director.

5 So the structure there is Marianne
6 Malizia as an SES as a 2-star level. And you know
7 what "SES" is, Senior Executive Service? You-all
8 have them.

9 And then her deputy is an O-6 colonel,
10 and she can delegate decision authority that way.

11 I as an advisor don't have that, but
12 there are certain meetings in the Pentagon where, if
13 Marianne Malizia couldn't go, she could not send the
14 O-6 because there are certain meetings that are
15 general officers and SES only, and so I -- I
16 provided that sort of backup.

17 But also during any kind of policies
18 that they are talking about, I would give my
19 opinion.

20 Q Did anyone report to you in that
21 position?

22 A No, except for certain -- certain

1 tasks I -- I was given. And they said, okay, you'll
2 have this team of people, and but -- but only for
3 various tasks. But no one reported to me. So I did
4 not write any officer performance reports. I didn't
5 write any civilian evaluations.

6 Q Were there any other senior military
7 advisors to the Secretary of the Air Force's Office
8 of Diversity and Inclusion at the time you were
9 there?

10 A No.

11 Q You were the only one.

12 A I was the only one.

13 Q And I believe you said, in addition to
14 attending meetings, you looked at some policies and
15 offered your opinion --

16 A Correct.

17 Q -- correct?

18 A Correct.

19 Q So again, without getting into detail
20 about your recommendations or internal
21 deliberations, can you explain at a high level which
22 policies or initiatives you worked on?

1 MR. CONNOLLY: Objection, form.

2 THE WITNESS: Policies that
3 concentrated on making things -- making certain jobs
4 within the Air Force easier for more airmen to
5 participate. For instance, height restrictions,
6 hair restrictions and such, and I always went in
7 there with a data-type attitude on it and not an
8 emotional. I said, "If it makes sense, yeah, it
9 probably does make sense."

10 Because Marianne Malizia did graduate
11 West Point in 1981. I think she spent maybe five
12 years in the Army Air Defense Artillery, but she's
13 been out of it for a while. And there would be a
14 lot of things I'd have to explain to her a lot how
15 Air Force works, how Army works. Even though she's
16 Army, at the higher level she doesn't understand
17 operational war and now Navy works and how Marines
18 work. And so I would be an advisor for those kinds
19 of things and then explain why something would be a
20 good idea or a bad idea. And -- and -- and if they
21 listened, they did. If they didn't, just -- just
22 like you as counselors, sometimes your -- your

1 clients don't listen.

2 Q So you mentioned specifically height
3 restrictions and hair restrictions. Do you recall
4 any other policies or initiatives that you looked
5 into?


6 A I was asked about a pronoun policy. I
7 was asked to look at, early on, the -- the
8 Department of the Air Force's DEI strategy, but
9 after awhile that dragged on. And it dragged on for
10 two years, and after awhile I said, "I've -- I've
11 given my inputs, more power to you."

12 I've given input on drag shows at
13 military bases, but -- but -- but high level things,
14 I try to look at things that would really be
15 barriers that don't necessarily need to be there.

16 Q Did you look at any initiatives or
17 policies that dealt with the issue of increasing
18 racial or ethnic diversity in the military?

19 A The Air Force even before this office
20 was formed, which it was formed in January of '21,
21 the -- the Assistant Secretary of the Air Force
22 Manpower and Reserve Affairs -- from now I'll say

1 SAF/MR -- SAF/MR tried to work with the Director of
2 Operations, these -- the Deputy Chief of Staff over
3 Operations, the A-3, on increasing on what they
4 called rated diversity.

5 "Rated" means that -- in the Air Force
6 pretty much ~~were~~  wings: pilot, navigator, or air
7 battle manager. And they noticed that not a lot
8 of -- there are not a lot of black pilots. The --
9 the dearth wasn't as stark with Hispanic, and -- and
10 I -- and the Air Force had been looking into this
11 for years and years. And I -- and I would go to
12 those meetings as well. That's when I was working
13 with SAF/MR.

14 Q So am I understanding correctly that
15 this was an initiative to see whether there were
16 ways to increase the racial diversity of the Air
17 Force; specifically, the number of black pilots?

18 MR. CONNOLLY: Objection, form.

19 THE WITNESS: And the answer is
20 partially true, but black pilots, navigator, and air
21 battle managers.

22 The reason why is, in the Air Force,

1 95-plus percent of the general officers are rated.
2 It's like in the Navy, 95-plus of the admirals are
3 the surface warfare aviations, submariner or special
4 ~~force~~. In the Army, same thing, combat arms. And
5 they wanted more in those fields so that one day,
6 because it takes awhile to grow a colonel and
7 generals, there would be a higher proportion.

8 Q Did you agree with this goal of
9 increasing the racial diversity of the Air Force;
10 specifically, black airmen?

11 MR. CONNOLLY: Objection, form.

12 THE WITNESS: I will answer that in
13 two parts: I partially agreed with it if they did
14 it the right way. And if they did it by just
15 handing it out, I said it's going to be a disaster
16 because people have to be -- have the aptitude for
17 it and want to do it. It's not something that you
18 can just force people into, especially in the rated
19 fields.

20 As a pilot, it -- it -- it brings with
21 it a ten-year commitment, whereas most every other
22 career field is only a five-year commitment. And so

1 I said, "If you try forcing this, you're -- you're
2 going to end up looking like fools." And over the
3 years, they ended up looking like fools.

4 BY MR. ROBINSON:

5 Q I think you said you were going to
6 answer in two parts.

7 A Okay. So -- so I sort of did it half
8 and half there. So -- so my answer: Yes, but if
9 done the right way.

10 Q So setting aside for a moment the
11 means of how we get there to the increased
12 diversity, and just focusing on the diversity
13 itself, you would agree with me that having more
14 black airmen in the Air Force would be a good thing,
15 correct?

16 MR. CONNOLLY: Objection. Objection,
17 form. Objection, misstates testimony.

18 THE WITNESS: I would not agree with
19 the way you said it. I would agree that it would
20 make a lot of senior leaders feel better, but I
21 don't think it's going to increase lethality. I
22 don't think it's going to increase our ability to

1 win.

2 I think the -- I think that finding
3 the best from every corner of the United States,
4 sometimes even the world, just like the NFL does it,
5 just like the NBA does it, just like Major League
6 Baseball does it, that's how you get lethality and
7 the diversity will happen on its own.

8 BY MR. ROBINSON:

9 Q What specifically did you do when you
10 were looking into this -- this initiative that we've
11 been discussing?

12 A I tried to push a program that -- that
13 I call, along with a few others who -- who had my
14 same mindset, an Aviation Professional Athlete Model
15 saying that we need to get out there and invest the
16 time and money in inspiring youth, from even age 10,
17 and then using low cost methods like VR and
18 computers, teach them how to fly. Have competitions
19 just like a lot of colleges around the United States
20 are doing with cyber right now, and they're having
21 teenage kids now beat professionals in those
22 competitions. I said, "We can do the same thing

1 with aviation." And once -- again, just like NFL
2 does, they sponsor **caps** and they build up their
3 bench. And professional sports, they -- everybody
4 in here knows that by age 16 to 17 some of the
5 major -- well, professional sports teams are already
6 keeping an eye on some of those. Of course they
7 can't go talk to them or anything, but they know who
8 is coming up, and we can be doing the same thing.

9 Q Okay. And so what did Air Force do on
10 this initiative to increase the racial diversity of
11 the Air Force?

12 A They did a program, and they are
13 continuing to do a program, that I -- I tried to
14 tell them over and over "you're wasting your money,"
15 but it's called the Junior Air Force -- so the Air
16 Force Junior ROTC Flight Academies. And what they
17 do is they -- they have JROTC, Junior ROTC, students
18 from all over the country compete for slots at
19 various colleges that have flight programs, and the
20 Air Force will pay for them to get their private
21 pilot's license.

22 And the -- the folks down at Maxwell

1 Air Force Base who run Junior ROTC put forth that,
2 "Oh, yes, this is going to get us more diversity,"
3 and I go, "Okay, but in the end" -- it's a
4 successful program, you get a lot of the youngsters
5 with their private pilot license, but then I say,
6 "Okay, what next?" I would be the one asking the
7 question: How many of them afterwards, after high
8 school, either went to ROTC, a service academy, or
9 had any inclination of joining the military? And
10 it's very low number. And I said, "See, you wasted
11 all that money for nothing. If we had started early
12 with another program that -- that is low cost, find
13 the stars, and then see if they have the -- the
14 propensity to serve, then we can pay for them in the
15 real airplanes and we'll get a much higher
16 percentage of this ~~diverse~~ that you're looking for
17 coming into the Air Force. But right now you just
18 wasted a lot of money."

19 Q Okay. Aside from that initiative and
20 the other initiatives we've discussed, do you recall
21 working on any other initiatives in this position?

22 MR. CONNOLLY: Objection, form.

1 THE WITNESS: Let me ask, in my
2 position with office of D&I or SAF/MR?

3 BY MR. ROBINSON:

4 Q Office of D&I.

5 A D&I. I -- I -- I did continue to try
6 and push that initiative.

7 Q Just so the record is clear, which
8 initiative, the Junior ROTC?

9 A The APAM. No, no, I think the JROTC
10 Flight Academy is a waste of money. I tried to push
11 the APAM, the Aviation Professional Athlete Model.

12 Q Understood, okay.

13 Can you say again why you believed in
14 that model?

15 MR. CONNOLLY: Objection, asked and
16 answered.

17 BY MR. ROBINSON:

18 Q You can answer.

19 A Well, because I know that naturally I
20 wanted to follow just like professional sports does
21 it. And if they go into every county, every city,
22 and start these programs there are going to be a

1 plethora of young people who take to it, especially
2 if it's free to them.

3 And then when -- once you get kids in
4 the competition, then that's when they really shine.
5 And -- and I know just like with professional sports
6 we'll get the -- the diversity that the higher-ups
7 are seeking for their moral purposes. It will get
8 them what they want.

9 Q Do you think diversity is valuable
10 only because it provides the higher-ups what they're
11 looking for?

12 MR. CONNOLLY: Objection, form.

13 THE WITNESS: So I would answer that
14 by saying what do you mean by diversity? And I can
15 tell you what I feel diversity is and then answer,
16 or you can tell me what you're specifically asking
17 me in diversity.

18 BY MR. ROBINSON:

19 Q Let's start with your definition.

20 A All right.

21 Q So you served in this role we've been
22 discussing, the senior military advisor, the

1 Secretary to the Air Force's Office of Diversity and
2 Inclusion. So I assume you had a definition of
3 diversity you were working with, correct?

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: I had a definition of
6 diversity that -- that they -- that the Air Force,
7 the Secretary of the Air Force and the Sec Def on
8 down had, and then I had my -- my definition of
9 diversity which I think is more accurate.

10 Q Let's hear your definition.

11 A My definition of diversity is varied
12 backgrounds, socioeconomic circumstances, languages,
13 culture, skill sets.

14 Q Can that include racial and ethnic
15 diversity as one factor in the overall diversity?

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: I think that that would
18 be coincidental at best.

19 BY MR. ROBINSON:

20 Q With that definition of diversity that
21 you use yourself, is its only value providing
22 comfort to senior leaders in --

1 MR. CONNOLLY: Objection.

2 BY MR. ROBINSON:

3 Q -- the organization?

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: So if -- so if it's
6 solely based on race and ethnic, then, yes, it's --
7 it's providing political comfort.

8 BY MR. ROBINSON:

9 Q So my question was applying your
10 definition.

11 A Uh-huh.

12 Q Which I understood did not mean just
13 racial and ethnic diversity. You listed a variety
14 of characteristics.

15 A Uh-huh.

16 Q And you said that race and ethnicity
17 could be part of that, coincidentally.

18 Under that definition, is the only
19 value it provides comfort to senior leaders?

20 MR. CONNOLLY: Objection, form.

21 THE WITNESS: And I would say, under
22 my definition of diversity, diversity can be a

1 strategic asset.

2 BY MR. ROBINSON:

3 Q Okay. Explain why that is.

4 MR. CONNOLLY: Object to the form.

5 THE WITNESS: Because in different
6 situations you're having different points of view to
7 get to a certain solution. With any military unit,
8 the mission and the mission objective is the thing
9 that everybody ought to be seeking.

10 Some people will have -- through their
11 background see one way of getting there, and some
12 people from another background will see maybe a
13 faster way, a cheaper way of getting there, based on
14 things that they've done in their life.

15 The same things holds true right now,
16 and many commanders, and I'm talking about combatant
17 commanders and combat commanders, remark that having
18 the National Guard or the Reserves there adds
19 synergy to the mission because some of them, in
20 their civilian capacity, have expertise that the
21 rest of the people in the unit didn't have.

22 BY MR. ROBINSON:

1 Q Could your definition of diversity,
2 again, help the military with issues of recruitment?

3 MR. CONNOLLY: Objection, form.

4 THE WITNESS: No.

5 BY MR. ROBINSON:

6 Q Okay. Why do you think that is?

7 MR. CONNOLLY: Objection, form.

8 THE WITNESS: My definition of
9 diversity, the benefits start when you go
10 operational. For recruitment, youngsters won't know
11 who is who. They -- they are not going to know what
12 somebody's background is. They're not going to know
13 how many languages that person knows. They're not
14 going to know if that person came up rich or poor.
15 So these are things that will be irrelevant to
16 recruits. They don't know who they're going in with

17 BY MR. ROBINSON:

18 Q When you were serving either at DoD or
19 anytime in your career, did you ever go to high
20 schools to recruit young men and women?

21 A I -- I went to high schools to speak
22 to them and inspire them, yes.

1 Q You talked about your experiences?

2 A I talked about my experiences.

3 Q You don't think that your unique
4 experiences were helpful in persuading those young
5 men and women to decide whether to enlist or not?

6 MR. CONNOLLY: Objection, form.

7 THE WITNESS: Well, that would all
8 depend on what those kids really want to do. If --
9 if they want -- if they want to fly and go around
10 the world, then yes. If that -- if they're not
11 interested in that, then no. Each person who goes
12 to talk will reach a certain segment of the audience
13 based on what those kids want to do.

14 BY MR. ROBINSON:

15 Q Back to your expert report, I'm at
16 page 3 now, still in the first paragraph. First
17 full sentence, you say: "I was also tasked with
18 reviewing Air Force policies to identify barriers
19 and other practices that may have an unfair effect
20 upon under represented airmen and guardians,
21 assessing the air reserve component implications of
22 the Independent Racial Disparity Review conducted by

1 the Department of the Air Force Inspector General,
2 and managing the ARC's development and
3 implementation of the GO Inspire Diversity
4 Recruiting Program initiated in January 2021.

5 A ARC means Air Reserve Component.

6 Q Thank you. So aside from any
7 initiatives or policies we've already discussed, are
8 there any other policies to identify barriers and
9 other practices that you worked on in this position?

10 MR. CONNOLLY: Objection, form.

11 THE WITNESS: I think we've talked
12 about all of those ones that -- that I drew opinions
13 of.

14 BY MR. ROBINSON:

15 Q Okay. You mentioned in this sentence
16 specifically identifying barriers?

17 A Barriers.

18 Q Barriers. What barriers did you
19 identify?

20 A To give one example, there used to be
21 certain regulations that prohibited airmen of a
22 certain height from being on air crews. And once

1 upon a time, certain aircraft that we had in the
2 inventory weren't built for everyone. But now most
3 of our aircraft, if not all, there are adjustments
4 that could be made. And so certain height limits
5 that they gave, we'd go, "Why?" And we said,
6 "Let -- let -- prove to us that that is actually
7 necessary for that particular height."

8 And they went out and did tests with
9 mainly women, because they were mostly the people
10 affected by this, and, "Can you reach that?" "Yes."
11 "Okay. Can you reach this? Can your -- can your
12 feet hit the pedals here?" "Yes." They said, "Then
13 why do we have those -- why do we have that height
14 restriction?" They go, "Uh, uh," and then they
15 changed it. So that -- that was a barrier.

16 Q Aside from that barrier, any other
17 barriers that you identified?

18 A There was one -- so bear in mind that
19 I'm in the military. And even if I don't agree, if
20 I'm given a task, I'm given a task. And so here's
21 another thing: If they said they wanted to get more
22 outreach into underserved areas -- that's the

1 terminology being used -- say, "Okay, fine. That's
2 actually good because, again, that's reaching out
3 and inspiring everybody." Except what -- the
4 restriction before was we could land an airplane
5 there, like maybe a cargo plane, tanker aircraft,
6 and the kids can go on the aircraft and look around
7 and go, "ooh, ah." And I said, "That's -- that's
8 not really inspiring." I -- I would go, "Mmm", if I
9 were a kid. "Fly them, then that's really going
10 to -- then that might inspire them." But there was
11 a restriction on doing those kinds of flights with
12 what they call unaffiliated youth. "Unaffiliated"
13 meaning they were not part of civil air patrol or
14 not part of any Junior ROTC.

15 So I -- I assisted in changing that
16 regulation so that they could actually fly kids on
17 certain missions. And I said, "Hey, it's -- it's --
18 especially if it's a training -- they're not going
19 to do it on a low level combat training mission, but
20 just to fly them around on the kind of training that
21 our air crews do regularly and not the combat kind,
22 there's no reason not to have some of those kids on

1 as passengers to see what that's about. And that
2 will inspire them to want to -- to -- to be part of
3 the Air Force."

4 Q Did you study or identify any barriers
5 that may have had an unfair effect on racial and
6 ethnic minorities, specifically?

7 MR. CONNOLLY: Objection, form.

8 THE WITNESS: I did not. They have --
9 so the Air Force has, as with the other services,
10 affiliation groups now. And their affiliation group
11 for black airmen looked into those kinds of things,
12 but quite honestly they didn't find -- they didn't
13 find anything that was data provable.

14 BY MR. ROBINSON:

15 Q You also say that you assessed the air
16 reserve component implications of the Independent
17 Racial Disparity Review?

18 A Uh-huh.

19 Q What specifically did you do?

20 A So what -- after they had that Racial
21 Disparity Review, it was a big uproar. Apparently
22 there is a disparity on the way minorities,

1 specifically blacks, are treated when it comes to
2 getting written up, court marshal, any other kind of
3 punishment. And -- and so after that we were tasked
4 to say, "How are we going to fix that?" And said,
5 all right, one way to fix it -- and we'd had various
6 meetings about this. But various different ways
7 like, okay, have better leadership, one, because
8 we -- we could say we can assume that black people
9 are more prone to get in trouble, or maybe they're
10 not, so we've got to really, really delve into this.
11 And they're still looking into this.

12 I don't think black people are more
13 prone to getting in trouble, so -- so maybe there's
14 something else. And then they said, "Okay, well,
15 maybe with certain folks" -- some people speculated
16 maybe black people coming out of their neighborhoods
17 don't like to be yelled at or have any kind of
18 orders barked at them. I said, "There's a whole lot
19 of white people from -- from rough neighborhoods who
20 are the same way. I -- I don't think you can keep
21 putting it race way that way. There are -- there
22 are other things going on." And I said, "They --

1 they really haven't been able to come up with any
2 data on how to truly fix it." I said, "But some of
3 the things that we suggested were, okay, if there --
4 we need to start putting body cams on any of our
5 security forces in case they are -- in case they are
6 hemming up airmen, all airmen, but particularly
7 black airmen, at least we can see what really
8 happened. And -- and -- and that -- and that will
9 give them more data to figure out what's going on."
10 But those are the kinds of things.

11 And then when it comes to the Air
12 Reserve component, shockingly, a lot of senior Air
13 Force -- a lot of senior DoD people, so Air Force,
14 Army, Navy and Marines, don't really think about how
15 it's going to affect the Reservist or the Guard
16 because a lot of them are thinking always Title 10
17 and UCMJ.

18 With the Reserves it's always Title
19 10, yes. If they are on the -- with the National
20 Guard, they have to think in terms of Title 32
21 unless the guardsmen are called to active duty on
22 Title 10 orders. And a lot of them don't -- don't

1 understand the nuances of that and what sort of
2 options a commander has for punishment; as if it's
3 something that happened off duty, in most cases in
4 the Guard, they'll say that's up to the police.

5 Now once they're on duty, then we can
6 do an investigation. Now, if it's something really
7 heinous, the commander could still do a
8 investigation and recommend that that person be
9 discharged. But -- but with Title 10, it's a lot
10 more simple and cut and dried with UCMJ and
11 everything

12 So I -- so I tried to at least educate
13 some of the people on the nuances of that.

14 Q Okay. And you worked specifically on
15 a GO Inspire --

16 A Yes.

17 Q -- program? What was that?

18 A So another one of those things is
19 trying to get out into every community and talk with
20 youngsters in high schools or even junior highs.
21 And our thing was we wanted to get more pilots.
22 Okay, so send pilots out there; and but,

1 specifically, generals who are pilots and get them
2 to go out in their flight suits and talk to these
3 kids and regal them with tales.

4 And the problem with that is,
5 especially the active duty generals, to get them
6 into every corner of the United States is very, very
7 difficult. Their schedules are pretty tight. If --
8 if these communities are near a major Air Force
9 base, then fine. But trying to get it elsewhere, I
10 said it's not going to work. You need the guard and
11 reserves in on this because then they have generals
12 who live everywhere in the United States and can go
13 in and talk to the people who live near them and
14 also to neighborhoods.

15 And so I was tasked ~~of~~ sort of like
16 what the whip does in Congress. I was tasked with
17 whipping up generals to go to these events all
18 across the United States.

19 Q And to go and GO Inspire, General
20 Officer.

21 A General Officer.

22 Q You were in charge of, recruiting,

1 general officers to go to these schools and do
2 recruitment.

3 A Yes.

4 Q And the goal of this program was to
5 increase the diversity of the Air Force?

6 A Yes.

7 Q Specifically racial and ethnic
8 diversity?

9 A Specifically racial and ethnic.

10 Q And do you agree with that goal?

11 MR. CONNOLLY: Objection, form.

12 THE WITNESS: I, again, do as I was
13 ordered. Now, the goal of just racial, I say it's
14 nice, but -- but for the purposes that they say it's
15 for, I say that's not true, stop saying that.
16 Because when people call you out on the data you're
17 not going to look good.

18 BY MR. ROBINSON:

19 Q I understand. I understand you were
20 asked to do this, but let's set aside for a moment
21 the fact that you were asked to do this. Did you
22 think this was an important program?

1 MR. CONNOLLY: Objection, form.

2 Objection, vague.

3 THE WITNESS: My -- again, with --
4 with anybody in the military when they're tasked
5 with a mission, what their personal feelings are are
6 irrelevant. I said, "Well, if this is -- if -- if
7 this particular mission objective is what you want,
8 here's how to get it." And that's how I gave my
9 advice.

10 BY MR. ROBINSON:

11 Q Do you know why the Air Force told you
12 to conduct this program?

13 A Mainly because I was the senior
14 military advisor, the only one.

15 Two, in that entire office, there were
16 no rated people except for me. And which forced me
17 sometimes to actually do task work that -- that --
18 that majors and lieutenant colonels should be doing.
19 But because no one in that office had any idea about
20 the rated community.

21 And then thirdly, because I have a
22 vast Rolodex of generals in the Guard and the

1 Reserves.

2 Q To put it a different way, this GO
3 Inspire Program that you worked on, did you support
4 the program.

5 MR. CONNOLLY: Objection, form. And
6 objection, asked and answered.

7 THE WITNESS: So I did what I had to
8 do to achieve my -- my ordered objectives.

9 BY MR. ROBINSON:

10 Q You're not testifying in this case on
11 behalf of the Department of Defense, right?

12 A Correct.

13 Q You're offering your personal
14 opinions --

15 A Yes.

16 Q -- personal experiences.

17 A Yes.

18 Q If it were up to you, would you have
19 implemented a program such as the GO Inspire
20 Program?

21 MR. CONNOLLY: Objection, form.

22 THE WITNESS: So you're asking if I

1 were -- if I was the one making all the rules.

2 No.

3 BY MR. ROBINSON:

4 Q Why not?

5 A I -- I would still be of the mind that
6 diversity the way I described it can help, and that
7 we have to do it the way that other professional
8 organizations do it. Like the NFL, NBA, and Major
9 League Baseball. And that way we can get the best
10 and brightest from everywhere. I -- I would
11 speculate and I would probably even put money down
12 that it would get natural diversity because there
13 are -- there are stars everywhere. And but -- but
14 any other thing that tries to force -- force a
15 number, that is a fool's folly.

16 Q You -- you believe the program was
17 trying to force a number?

18 A Yes.

19 Q Why?

20 A Because they said so.

21 Q You were going out and talking to
22 students about the value and pride of a military

1 career.

2 A Yes.

3 Q Right, okay. Okay.

4 Let's look at page 22 of your report.

5 You say here -- this is in the first
6 full paragraph toward the bottom of the page. You
7 mention that you were assigned to multiple diversity
8 and inclusion departments within the Pentagon.

9 I know we discussed some of those
10 departments earlier.

11 A Page 22, okay.

12 Q So which specific departments did you
13 work in?

14 A Oh, so I -- when I say "assigned to,"
15 that means that working with various diversity and
16 inclusion departments on -- on issues to -- to bring
17 the Air Force perspective into what the DoD wants.

18 As a matter of fact, in -- in some of
19 those particular meetings of one of your witnesses,
20 Jeannette Haynie was there, and we'd talk about,
21 okay, how it could benefit Navy, Marines, and Air
22 Force because we're all in a dearth for pilots

1 period. But if the DoD wants more racial diversity,
2 what is the best way of doing that.

3 Q Understood. So just so I'm clear, you
4 worked in the Office of the Secretary of the Air
5 Force's Office of Diversity and Inclusion, correct?

6 A Correct.

7 Q You didn't work in any other office at
8 the Pentagon at any period in time.

9 A No, I worked in the SAF/MR.

10 Q Oh, right. Right.

11 A And then long ago in the A8 in the
12 Pentagon and also the National Guard Bureau's J8 in
13 the Pentagon.

14 Q Were any of those other positions
15 involved in diversity and inclusion issues?

16 A SAF/MR only peripherally because that
17 is going to fall under personnel. And any policy
18 that comes up, whether it be for diversity or
19 anything else, the SAF/MR, the Assistant Secretary
20 will have to sign on it.

21 Q Okay. Could we turn to page 58 of
22 your report. This is your curriculum vitae,

1 correct?

2 A Yes.

3 Q And under Experience, it lists this
4 position as Senior Military Advisor to Secretary of
5 the Air Force. It says --

6 A There's a typo there. There's
7 "Present," and it should have been October 1st of
8 2023.

9 Q No problem.

10 MR. CONNOLLY: I'm sorry, did you say
11 page 57?

12 MR. ROBINSON: Yes.

13 BY MR. ROBINSON:

14 Q That was going to be my next question.

15 A Uh-huh.

16 Q You mention on page 58 that you served
17 as Chief of Staff of the West Virginia Air National
18 Guard.

19 A Uh-huh.

20 Q From December 2016 to February 2019.

21 A Uh-huh.

22 Q And you say that you assisted in areas

1 of diversity, force development, force management,
2 total force, and airmen family readiness.

3 A Yes.

4 Q What specifically did you do to assist
5 in areas of diversity?

6 A I was assigned by the **adjuvant**
7 ~~general~~, James A. Hoyer, ~~major~~ **general**, to represent
8 West Virginia on the National Guard Bureau's Joint
9 Diversity Executive Council.

10 Q Did you do anything else to assist in
11 areas of diversity in that role?

12 A No.

13 Q Okay. What did that entail?

14 MR. CONNOLLY: Objection, form.

15 THE WITNESS: Meetings. So regional
16 meetings. West Virginia is in the Mid-Atlantic
17 region. And then national meetings in DC. They are
18 in the Pentagon or at the Army **readiness** Center in
19 Arlington. And go there and discuss what the Chief
20 of the National Guard Bureau is seeking. And then
21 we would report on what is being done in our various
22 states or regions to achieve the Chief of the

1 National Guard -- National Guard Bureau's
2 objectives.

3 BY MR. ROBINSON:

4 Q Aside from the positions we've
5 discussed, have you held any other job where you
6 assisted in areas of diversity and inclusion?

7 MR. CONNOLLY: Objection, form.

8 THE WITNESS: SAF DI and JDEC, that's
9 it.

10 BY MR. ROBINSON:

11 Q Okay.

12 MR. CONNOLLY: If you're turning to
13 another exhibit, we've been going for an hour,
14 should we take a break?

15 MR. ROBINSON: Sure.

16 (A recess was taken)

17 BY MR. ROBINSON:

18 Q General Walker, if we could go back to
19 your curriculum vitae.

20 A Yeah.

21 Q This is page 57 of your report. We
22 talked about that typo, first bullet under

1 experience.

2 Were there any other typos or things
3 you wanted to correct in your curriculum vitae?

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: No.

6 BY MR. ROBINSON:

7 Q Okay. And you said that you reviewed
8 your report and your rebuttal report in anticipation
9 for the deposition today?

10 A Yes.

11 Q When you did that, did you notice any
12 mistakes or things you wanted to correct?

13 A There was one, yeah. I'm a stickler
14 for grammar and spelling, and there was one
15 particular sentence where "to," T-O, should have
16 been added, and I said (indicating). So -- because
17 I'm particularly harsh on when my subordinates send
18 some sort of report to me and then I have to do
19 editing again, and so I said don't go that. Sorry
20 about that.

21 Q Aside from that typo, any other
22 mistakes or things you wanted to correct in the

1 report?

2 A I think I might have found one other
3 typo somewhere, but I -- after a while, I said, "Eh,
4 what's done is done." So I cannot remember where
5 that one was, either. I'd have to just read the
6 whole thing again again, so...

7 Q No substantive errors --

8 A No.

9 Q -- or mistakes?

10 A No.

11 Q Okay. And just going back to
12 something you said at the beginning of the
13 deposition, you said that you had provided testimony
14 in a -- was it a 1-5 -- 1565?

15 A So --

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: 15-6 is the Army's
18 version of Command Directed Investigation.

19 I've also been the investigator for
20 15-6. And I've also been the investigator of CDI's,
21 commander-directed investigations, and I've also
22 been questioned on them. I've been questioned by IG

1 when certain complaints come up about people whom I
2 have contact with or work for or work with.

3 Q The 15-6 where you provide testimony,
4 what was the nature of that proceeding?

5 MR. CONNOLLY: Objection, form.

6 THE WITNESS: From what I remember, it
7 was whether I had ever seen a certain person coming
8 into work every day.

9 BY MR. ROBINSON:

10 Q Okay. So you were not the subject of
11 that investigation?

12 A No. No.

13 Q You were asked to provide factual
14 testimony?

15 A Correct.

16 Q Someone else was the subject.

17 A Yes.

18 Q Okay. For any of those proceedings
19 that you just mentioned, were you ever the subject
20 of the investigation?

21 A No.

22 Q Okay.

1 A (indiscernible).

2 Q Okay. And we also discussed I think
3 in the context of the GO Inspire Program you had
4 mentioned that you had been directed to assist that
5 program by the Air Force, correct?

6 A Correct.

7 Q And you said that the Air Force told
8 you that they wanted to increase the racial and
9 ethnic diversity of the Air Force, correct?

10 A Ye- --

11 MR. CONNOLLY: Objection, form.

12 THE WITNESS: Yes. As a matter of
13 fact, they'll -- they'll tell you right now if you
14 ask them.

15 BY MR. ROBINSON:

16 Q Why did they tell you that they wanted
17 to increase the racial and ethnic diversity of the
18 Air Force?

19 A So before the current directives came
20 down from the current ~~Seet AF~~, the Chief of Staff of
21 the Air Force at the time, Dave Goldfein, call sign
22 "Fingers," ~~direct~~ this is -- this is something we

1 should be trying to achieve. And when the Chief of
2 Staff of the Air Force says it, you go, "Yes, sir,
3 okay," and you do it.

4 Q I understand he told you this is
5 something we want to achieve, but did he tell you
6 why they wanted to achieve it?

7 MR. CONNOLLY: Objection, form.

8 THE WITNESS: You know, I -- for --
9 for -- from what I can remember back when General
10 Goldfein was the Chief of Staff of the Air Force, he
11 saw that there's a dearth of minority pilots, and
12 that's going to affect the -- what the senior
13 members of the Air Force look like one of these days
14 as -- as people go on in rank. Because again,
15 mostly pilot -- mostly pilots. General officers are
16 mostly pilots and navigators and air battle
17 managers.

18 And from what I remember, he just
19 said, "Hey" -- there was one time, it might have
20 been during an Air Crew Summit or during some other
21 meeting, he just said, "Look around the room.
22 What's wrong with this?" And -- and he -- because

1 he was trying to note the lack of black generals in
2 the room.

3 BY MR. ROBINSON:

4 Q Did you --

5 A So we can apply what he was saying.

6 Q Did you disagree with the Air Force
7 Chief of Staff's view?

8 MR. CONNOLLY: Objection, form.

9 THE WITNESS: I can't say that I
10 disagreed. I -- I -- I -- my main thought was,
11 "Okay, if that's what you want."

12 BY MR. ROBINSON:

13 Q I just want to make sure I understand.
14 You say you didn't disagree. So you agreed with his
15 view that the Air Force should increase the racial
16 diversity of the Officer Corps?

17 MR. CONNOLLY: Objection, form.

18 THE WITNESS: In my opinion, I figured
19 he was trying to do that to give a political win to
20 the Air Force. And at that -- at that level, that's
21 what some senior DoD members do. And so I said --
22 so I -- I -- I didn't say, "This is BS." I -- what

1 I did say was, "Okay, okay, I'll salute smartly and
2 march forward."

3 BY MR. ROBINSON:

4 Q So it sounds like you did disagree
5 with the Chief of Staff of the Air Force's goal.

6 MR. CONNOLLY: Objection, form.

7 Objection, asked and answered.

8 THE WITNESS: I -- so not being
9 excited about it and -- and -- and cheering for it
10 doesn't necessarily mean I disagree. It just means
11 that he and I took different tacks on this.

12 BY MR. ROBINSON:

13 Q Sitting here today again not speaking
14 for the Department of Defense, speaking for
15 yourself, do you agree with the Chief of Staff of
16 the Air Force that they should try to increase the
17 racial diversity of the Officer Corps?

18 MR. CONNOLLY: Objection, form.

19 Objection, asked and answered.

20 THE WITNESS: No.

21 BY MR. ROBINSON:

22 Q When the Air Force told you that they

1 wanted to increase the racial diversity of the
2 Officer Corps, did they tell you by how much they
3 wanted to increase the diversity?

4 A They were very careful not to do
5 numbers. And until recently the Secretary of the
6 Air Force put down a stated goal for -- I think for
7 at least the service academy. But -- but they were
8 very careful not to use numbers because they knew
9 that it could be brought up against them in court
10 that they are trying to do quotas.

11 Q Did anyone ever tell you that?

12 A Yes.

13 Q Who told you that?

14 A Plethora of people. It was a
15 discussion during meetings saying, "Hey, can --
16 cannot use numbers here."

17 Q Okay. Let's look at Exhibit 2. I
18 will mark it.

19 (Deposition Exhibit 2 marked)

20 THE WITNESS: Uh-huh.

21 BY MR. ROBINSON:

22 Q On your --

1 MR. CONNOLLY: If you wouldn't mind,
2 may I have a chance to read this?

3 MR. ROBINSON: You may. Let me know
4 when you're ready.

5 THE WITNESS: I would do it with a
6 lull about it.

7 MR. CONNOLLY: Okay.

8 BY MR. ROBINSON:

9 Q While you're reading, just going back
10 to the last question, you said that people told you
11 not to use quotas. Do you -- who specifically told
12 you that?

13 A Trying to think of all the different
14 names. Various persons within SAF/MR. John
15 Fedrigo, maybe at the time Christy Nolta, various
16 generals. As a matter of fact, I -- I do recall
17 hearing C.Q. Brown say it as well during a couple of
18 meetings.

19 Q Which --

20 A And then when the Secretary of the Air
21 Force did put down some numbers in the last couple
22 years, there was discussion going, "Ooo, we've got

1 to be careful about this."

2 Also, yes, it's obvious -- it should
3 be obvious. It should have been the first thing I
4 said, but the -- the JAGs and the general counsels
5 who were in those meetings were -- were saying that
6 as well.

7 Q Which generals told you not to use
8 quotas?

9 A So when you say tell me, do you mean
10 just mentioned it or came to me and said to me?

11 Q I mean said in your presence --

12 A In my presence.

13 Q -- "We are not using quotas."

14 MR. CONNOLLY: Objection, form.

15 THE WITNESS: I couldn't safely say.

16 Chief of staff of the Air Force, C.Q. Brown was
17 currently the chairman of the joint chiefs of staff.
18 The current C-staff, Dave Allvin, who was Vice Chief
19 of Staff at the time. Even the current Assistant
20 Secretary of the Air Force Manpower and Reserve
21 Affairs, Alex Wagner. Just about everybody in the
22 meeting was saying, "Hey, let's be careful about

1 this."

2 Q Okay. Okay. Let's turn back to
3 Exhibit 2.

4 MR. CONNOLLY: Do you need any time to
5 review this document?

6 THE WITNESS: I don't.

7 MR. CONNOLLY: Okay.

8 BY MR. ROBINSON:

9 Q So you say in your CV that you
10 attended an executive leadership program in managing
11 for inclusion at Georgetown University, correct?

12 A Correct.

13 Q Is this a description for that course?

14 A Yes.

15 Q Okay.

16 A And -- yes.

17 MR. CONNOLLY: Counsel, where are you
18 referring from his report?

19 MR. ROBINSON: That was page 59 under
20 "Education."

21 BY MR. ROBINSON:

22 Q And I'll represent to you and your

1 counsel that I just pulled this from the internet.

2 I Googled the course. Okay.

3 A I was in the first -- I was in the
4 pilot of that particular course.

5 Q Oh, okay. How many people were in it?

6 A Probably 12 of us.

7 Q And do you know if they've been doing
8 it reg- -- on a regular basis since you did the
9 pilot program?

10 A Up until when I left.

11 Q Okay. Every year?

12 A No, I -- from what I remember it was
13 maybe twice -- two or three times a year.

14 Q Who were the other attendees of the
15 program?

16 A When I went through, Marianne Malizia,
17 John Fedrigo. Who -- what was her name? She was
18 the A2 at the time. O'Brien, Mary O'Brien. And I'd
19 have to really dig to think of all the other people
20 who were in that course.

21 Q That's fine. So --

22 A But they were all general officers and

1 senior executive --

2 Q In the Air Force specifically or
3 throughout the military?

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: In at least the pilot,
6 Air Force.

7 BY MR. ROBINSON:

8 Q Understood. Why did you attend this
9 program?

10 A Because my boss said, "Hey, we need
11 to -- we need to see if this program is worthwhile."

12 Q Okay. Can you describe generally what
13 the program entailed?

14 A It -- it -- it was similar to
15 briefings on inclusion that some of the service
16 members are getting now, but they tried to put it on
17 a higher level. And -- and in all honesty, it was
18 propaganda. They were trying to -- they were
19 actually trying to convince us that -- that white
20 people should be thought of as the oppressors and
21 everybody else as the oppressed. Thus, matter of
22 fact, got into a little argument with -- when they

1 were trying to say -- when they -- when one of
2 their -- one of their professors claimed that black
3 people can't be racist, and I was like, "Oh, Jesus."
4 And I -- and I remember so somebody, two other
5 people who I -- whom I do, Brigadier General Tracy
6 Smith and Brigadier General David Cochran attended
7 the course later, and they came to me and said, "Can
8 you believe that shit they were saying, that 'ish'
9 they were saying?" I said, "Hey" -- I said -- I
10 told -- I -- in my critique, I said, "Okay, this
11 program is going to cause problems because there are
12 going to be people who -- who argue back." And that
13 particular professor didn't like arguing back. Say,
14 "Hey, you know, this is the way it is." And we were
15 supposed to take it as gospel. And most folks at
16 our level know that that's not true or don't -- or
17 just don't agree with that, and we're not going to
18 walk away going, "Yeah, Boss."

19 Q I want to ask you some questions about
20 what the course covered. So -- well, first of all,
21 how long was the course?

22 A Couple weeks. And it was -- and it

1 was at that time truly virtual. Now they -- now I
2 think they do it in person, but back then it was
3 still with the old COVID stuff.

4 Q Was it all day every day?

5 A No. You know, maybe it was only a
6 week, but -- but it was -- but it was, yeah, almost
7 all day every day.

8 Q The --

9 A With homework assignments.

10 Q The first bullet under the Course
11 Description says: "Upon successful completion of
12 this program, participants should be able to explain
13 the foundational underpinnings of the field of
14 diversity and inclusion management; i.e, social
15 identity theory, implicit bias, microaggressions,
16 intent versus impact, power and privilege inclusion
17 theory, et cetera."

18 Do you remember covering those topics
19 in the program?

20 A Oh, yes.

21 Q What is social identity theory?

22 A So in their mind, people who want to

1 identify as whatever they want, they were trying to
2 tell us as military leaders we should just go along
3 with it. And we said, "Okay, well, if that's the
4 law, then fine. But don't ask us to cheer it." But
5 they weren't actually trying to get us to cheer it,
6 but, again, that is -- that is -- that is part of
7 it.

8 And then they got into pronouns and
9 they -- and they tried to tell us that as senior
10 leaders, every person we meet, we should ask us what
11 their pronouns are. And some of us said, "No,
12 that's not going to happen."

13 Q When you say "they" were trying to get
14 you to cheer, you're referring to your instructors
15 in the course?

16 A No, no -- yeah, the instructors in the
17 course, yes, yes.

18 Q Okay. And when they were telling you
19 what social identity theory says, were they relying
20 on studies and research that they used?

21 A Yes. Yes.

22 Q Okay. Did you review that research

1 and studies for the homework assignments?

2 A Well, it was during their slides that
3 they would show us these things.

4 Q Okay. Have you ever used or applied
5 social identity theory in your work in the Air
6 Force?

7 A No.

8 MR. CONNOLLY: Objection, form.

9 BY MR. ROBINSON:

10 Q What is implicit bias?

11 MR. CONNOLLY: Objection, form.

12 THE WITNESS: So according to them,
13 implicit bias is I walk into this room and the first
14 thing you see is a black man and not a -- and not a
15 man.

16 BY MR. ROBINSON:

17 Q And again, when you say "they," you're
18 referring to --

19 A To the instructors.

20 Q The instructors.

21 A That's an example.

22 Q Okay.

1 A But -- but they did go into other
2 things that I said, "Yeah, that's reasonable." For
3 instance, everyone has implicit biases. If they see
4 somebody dressed very well, they're going to
5 think -- they're going to think differently than if
6 they see somebody dressed bummy. And but these are
7 common sense things.

8 But then they started trying to bring
9 it into the racial thing, and I said, "Okay, that's
10 a stretch. Maybe some people, but not everybody."
11 But in their mind everybody, every white person
12 thinks this way. And I go -- I even brought up a
13 couple times, I said, "You know what? I've -- I've
14 been in combat and -- and shed blood and tears with
15 a lot of folks, and I can guarantee you that's not
16 what they -- what they are thinking about me when I
17 walk in the room. But if you want to think that,
18 fine, but I'm not going to think that."

19 Q So it sounds like you agree with some
20 aspects --

21 A Uh-huh.

22 Q -- of implicit bias theory and

1 disagree with other aspects of it. Is that fair?

2 MR. CONNOLLY: Objection, form.

3 THE WITNESS: That is fair. When they
4 start trying to bring it into critical race theory,
5 then I -- that's when they lose me.

6 BY MR. ROBINSON:

7 Q Is it fair to say that you disagree
8 with implicit bias theory as it relates to race?

9 MR. CONNOLLY: Objection, form.

10 THE WITNESS: I will give them that
11 some people think that way, but not all. And they
12 were trying to say it's all.

13 BY MR. ROBINSON:

14 Q Have you yourself done any academic
15 research on diversity and inclusion?

16 A No.

17 Q Have you authored any peer reviewed
18 publications on diversity and inclusion issues?

19 A No.

20 Q Have you authored any publications
21 about diversity and inclusion generally, even if not
22 peer reviewed?

1 MR. CONNOLLY: Objection, form.

2 THE WITNESS: No.

3 BY MR. ROBINSON:

4 Q Have you authored any opinion
5 editorials about diversity and inclusion issues?

6 A No.

7 Q Have you authored any blog posts about
8 diversity and inclusion issues?

9 A No.

10 Q Have you worked with any academic
11 institutions on diversity and inclusion issues?

12 A There -- there was an initiative also
13 by the secretary -- well, I think it started with
14 Secretary of the Air Force but got support by the
15 Secretary of Defense to -- to form a UARC,
16 **Universally** Affiliated Research Center, with an
17 HBCU, Historically Black ~~and colored~~ university
18 [sic]. And I was tasked to be in those meetings to
19 see, all right, how best to do this. And that
20 required -- well, it didn't require, but they
21 suggested visits to certain HBCUs just to see what
22 sort of programs they already have and, if they are

1 going to set this up, set it up for success, because
2 being a UARC is more than -- well, first of all,
3 there are things where -- categories that
4 universities have to be in in order to -- to be a
5 UARC. They are R2, R1, meaning that the amount of
6 research that that -- that particular institution
7 does.

8 And secondly, there are other things
9 that people might not think about like the security
10 issues. If they are going to be working with the
11 Air Force, there are certain things that will --
12 most things will at least be CUI, **as** you know what
13 that is, all the way up to secret. And in some
14 UARCs, they might even get into top secret. And so
15 we have to say, all right, so how is this
16 institution first of all going to vet -- the
17 government will vet. But then where are they going
18 to store any of this research they are doing for us?
19 And so we'd have to make sure they are set up for
20 success.

21 Eventually, and you-all probably saw
22 it in the news, the Howard University was chosen as

1 that HBCU UARC.

2 Q Okay. So what was your involvement in
3 working on that?

4 A In -- in meetings seeing how they are
5 progressing, what -- trying to help suggest things
6 we need to look out for in order to make it a
7 success. And -- and also visiting some of the
8 universities. Visited Alabama State, Tuskegee,
9 Howard, but just to see what sort of programs that
10 they had. Because a lot of them were -- were
11 competing to be in this program.

12 Q You've never been employed by a
13 university, have you?

14 A No.

15 Q Okay. Have you ever presented at a
16 conference on diversity and inclusion issues?

17 A No.

18 Q Have you done any other public basing
19 publications or presentations that address diversity
20 and inclusion issues that we haven't talked about?

21 MR. CONNOLLY: Objection, form.

22 THE WITNESS: I've done speeches

1 promoting the -- the athlete -- the Aviation
2 Professional Athlete Model, but all of my
3 presentations were -- were pointedly to find the
4 best and the brightest from everywhere.

5 BY MR. ROBINSON:

6 Q When did you give a speech on that?

7 A During one of the -- and it was to a
8 bunch of other general officers, but it was during
9 one of the Air Crew Summits. So it could have been
10 an Air Crew Summit. And -- and so it could have
11 been before I was with SAF DI and while I was with
12 SAF/MR, but I've been to a lot of those Air Crew
13 Summits. I can't remember which one I presented.

14 Q Do you know if your remarks are
15 publicly available?

16 A Publicly, maybe not. But within the
17 Air Force they are.

18 Q Do you have a rough estimate of a
19 year? Was it within the last five years?

20 A Yes.

21 Q Within the last three years?

22 A This is '24. Maybe.

1 Q Okay.

2 A I -- I -- I've been pushing APAM for a
3 long time.

4 Q Ask you then: When did you come up
5 with that idea?

6 A Actually, it wasn't me who came up
7 with that idea. I was introduced to a retired naval
8 officer, Flack Maguire, and he talked to me about
9 it. As he was saying, "Hey, look, the Air Force" --
10 and he said and the Navy. And it's true. The Navy
11 was looking toward get are more black pilots. And
12 he said to me, "I think they're doing it wrong.
13 If -- if they -- if they just go for inspire in
14 every corner of the United States, what they're
15 seeking will happen naturally. Right now what
16 they're doing is setting themself up for court
17 cases."

18 Q He said if they go about inspire it
19 will happen --

20 A Inspiring youngsters.

21 Q Not the GO Inspire Program,
22 specifically.

1 A No, no, no, no, no. He had no idea
2 about that.

3 Q When was this?

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: It had to be maybe
6 2020.

7 BY MR. ROBINSON:

8 Q Is this idea based on any research
9 that you've reviewed?

10 A Research. Not per se. I saw a
11 presentation talking about how China is doing it
12 right now -- has been doing it and the results that
13 they are getting. So I -- so I've seen some of
14 that -- so I saw some of that presented.

15 And then we -- then during the
16 presentation there was also a graph of showing how
17 the military does things and waiting until age 20 --
18 age 22 to try and put out world class pilots,
19 whereas China is starting them at age 12. So by the
20 time they get to age 22 they are Olympic quality
21 already.

22 Q Where did you see this presentation?

1 A In the Pentagon.

2 Q Who gave it?

3 A Flack and/or Deacon Ruffin. That's
4 his call sign, but his name is Kenyatta Ruffin.
5 He's a -- he should be a colonel by now. He was a
6 lieutenant colonel at the time.

7 Q And aside from this presentation, have
8 you done anything to research this idea?

9 MR. CONNOLLY: Objection, form.

10 THE WITNESS: Research the idea? No,
11 I was -- I was sold immediately. As I said, the
12 only reason I was sold immediately is because I
13 know, again, as I've said before, that the NFL, NBA
14 and Major League Baseball do it. We can replicate
15 it, meaning DoD. And DoD has more resource --
16 resources than they do.

17 BY MR. ROBINSON:

18 Q You didn't look at any hard data
19 showing that this model would yield better results
20 than some other model?

21 MR. CONNOLLY: Objection, form.

22 THE WITNESS: The only thing that I --

1 that I looked at and read in that regard were the
2 reports coming out of China. One by -- one that
3 needed to be translated because it was all Chinese.
4 And then one that was from some newspaper that
5 covers Asia, and China in particular. Newspaper or
6 magazine.

7 BY MR. ROBINSON:

8 Q Was this about how China was
9 increasing the racial and ethnic diversity up there?

10 A No, it was how they were making better
11 pilots to be able to beat our ass in the -- to be
12 able to defeat the United States some day.

13 Q Could you talk about your experience
14 being deployed.

15 A All right. Well, then there's an
16 awful lot to that, so shall we go with the fi- -- so
17 my first deployments were actually not too bad
18 because that's when I was with the Hurricane Hunters
19 and we were deployed different places waiting for
20 hurricanes to come in and then to fly into them.
21 And then also during the Hurricane Hunters we had
22 another mission that used to be classified, but now

1 it's out there, called the Pony Express where we do
2 air sampling and we -- I'd be either deployed for a
3 couple of months at Midway Island or a couple months
4 at Kwajalein Island. And we would be on standby
5 waiting for Russia to test their missiles. And
6 after the -- after the missile test and the low
7 yield explosions, God help us, we were supposed to
8 fly through it in order to sample the **edge** to
9 determine exactly what kind of materials that they
10 were using in their warheads.

11 Q You had other deployments during your
12 career?

13 A Yes.

14 Q Could you say briefly where they were?

15 A Okay. Saudi Arabia, Oman, Kenya,
16 Germany, Italy, Korea, Philippines, Iraq.
17 Afghanistan we were just flying in and out so I -- I
18 did not -- I was not at Bagram or Kandahar. But
19 we'd fly in there all the time, and I -- but even
20 before those bases were established, we were flying
21 in there when there was nothing and at night with
22 the night vision goggles. But we were based out of

1 Oman flying there.

2 Q For those deployments, were you
3 stationed at air bases?

4 A Yeah, except for Kenya.

5 Q Okay, where were you stationed in
6 Kenya?

7 A They had us at a hotel, the Whitesands
8 Hotel in Mombasa.

9 Q Were you ever deployed on a Navy ship?

10 A No.

11 Q Ever deployed on a Marine Corps
12 vessel?

13 A Vessel, no.

14 Q Ship?

15 A No.

16 Q Have you ever been on a Navy ship?

17 A Yes.

18 Q When?

19 A When I was doing my advanced joint
20 professional military education at Norfolk, they --
21 they would take all of us and -- and -- on the ships
22 and submarines and show us how the crew operates,

1 what the important things are. At that time we had
2 the clearance and they'd show us -- they'd show us
3 things that they wouldn't normally show other
4 people.

5 Q You've never been on a submarine?

6 A Yes.

7 Q You have been on a submarine.

8 A Yes.

9 Q Was that in the same context?

10 A Yes.

11 Q Okay. Never served on a submarine.

12 A No.

13 Q Never served on an aircraft carrier.

14 MR. CONNOLLY: Objection, form.

15 THE WITNESS: No.

16 BY MR. ROBINSON:

17 Q And sorry, did you want to add
18 something to your prior answer?

19 A No, no, but I -- but I've worked
20 closely with people who were submariners and carrier
21 surface warfare officers and even **terror** task group
22 commanders.

1 Q General Walker, you ran for Congress
2 recently --

3 A I did.

4 Q -- correct? Why did you run for
5 Congress?

6 A Several reasons. But the first was I
7 had a lot of folks within the Guard, National Guard,
8 and -- and in active duty saying, "Man, we need you
9 up there after you retire." And I go, "Up there?
10 What do you mean 'up there'?" "Congress." I said,
11 "You-all must be crazy." But they rode me more and
12 more, and I go, "Okay, I will look into it."

13 And then come the time when I was
14 retiring, I -- I saw what was happening across our
15 DoD. My main issue not -- was not the race and
16 diversity. My main issue was our lack of
17 preparedness and the fact that I -- in my opinion
18 and a lot of other senior officers' opinion we're
19 not taking the China threat seriously.

20 And in considering the -- and I know
21 because I've -- I've been there in exercises where
22 we -- we fight it out and I see what happens. I

1 said, "We don't have enough munitions," and we're
2 using up -- we're giving away our 155 millimeter
3 shells to Ukraine right now. They need at least
4 100,000 per month, but they prefer to have 300,000
5 per month. And at the time our national capability
6 to produce was 28,000 a month. I said, "Okay, where
7 are these going to come from if the balloon goes up
8 with China?"

9 The same thing with all sorts of
10 munitions. So Mark 48 torpedoes, Tomahawks. The
11 **ceasefire** missiles that we're wasting right now that
12 cost 1.2 million each to shoot down \$20,000 drones
13 with the Houthis. I -- I see all of that and I go,
14 "Okay, in Congress at least if I'm on the HASC I can
15 start demanding that we -- through the NDAA, the
16 National Defense Authorization Act, that we -- we
17 can get our industrial base up in order to produce
18 these weapons and -- and -- and truly be ready for
19 China." Because something you may or may not know,
20 but in a China scenario, the Navy is going to be
21 king.

22 The problem is with all the -- if we

1 got all the ships out there, we don't have enough
2 sailors to man all of those ships properly. But
3 let's say we were. They can only get so close
4 before China starts raining down missiles. And
5 China has thought about this for a long time. And
6 they producing enough missiles that they know that
7 we on our ships will run out of the stores. Our
8 magazine will be empty to shoot down those incoming
9 missiles. And so --

10 And to top it off, there is no ability
11 right now for us to rearm those ships at sea. So
12 they'll have to turn around and sail all the way
13 back to Pearl Harbor, or maybe Guam. But it ha- --
14 and it has to be a certified port to rearm them,
15 otherwise it could blow them up. And so I said,
16 "There's no -- we're in trouble if we're -- if we go
17 against China." And China knows this. And so I
18 said, "It's time to get us serious," because we have
19 people in the HASC right now who are sort of
20 concerned with it, but I wanted to be one who was
21 banging the table about it.

22 Q So you ran for Congress. You ran for

1 the Republican primary nomination, correct?

2 A Yes.

3 Q You were not successful?

4 A I was not successful.

5 Q Do you plan to run again one day,
6 perhaps?

7 A Maybe. I **still** see -- we'll see
8 what -- what sort of seriousness our DoD turns
9 toward. But if -- if not, then I'll probably go
10 again in order to try and help with that.

11 Q You said that diversity and inclusion
12 was not one of your main issues during the campaign.
13 But did you ever address that issue either in
14 debates or in interviews or on your website?

15 MR. CONNOLLY: Objection, form.

16 THE WITNESS: I -- I did respond
17 because my opponent, his campaign used the fact that
18 I worked for the Secretary of the Air Force Office
19 of Diversity and Inclusion and said that -- and
20 claimed that I was a DEI guy.

21 BY MR. ROBINSON:

22 Q And so you respond today that?

1 A I responded to that.

2 Q How did you respond to it?

3 A I said in the -- my opponent has never
4 served, so he may not know that in the military we
5 take orders and we don't -- we don't pick and choose
6 our orders.

7 Q Was this in a debate or an interview
8 or how did you respond to him?

9 MR. CONNOLLY: Objection, form.

10 THE WITNESS: It was -- it was when
11 asked by certain radio hosts who interviewed me
12 and -- and brought it up saying, "Hey, Riley Moore
13 says that you..." And -- and that -- so that was my
14 response.

15 BY MR. ROBINSON:

16 Q Did you address racial and ethnic
17 diversity issues in any other context during your
18 campaign?

19 A No.

20 Q You have a Twitter account or X
21 account, correct?

22 A Yes.

1 Q Is it @chriswalkerWV?

2 A So that one is my -- that one was for
3 the campaign, yes. Yes.

4 Q You have a personal one as well?

5 A Yes, I -- but I don't really put a lot
6 on there. I might reTweet something I see on there,
7 but really I don't put a lot of original content on
8 that.

9 Q What's the handle for the personal
10 Twitter?

11 A Good question. Try -- try @mwuagi. I
12 have nothing to hide.

13 Q Are you on any other social media
14 besides --

15 A Facebook.

16 Q Anything else?

17 A I think I did Instagram years ago, but
18 I have no idea how to log -- I wouldn't even know
19 what I would put to log into it, so...

20 Q Very good, okay.

21 A Ah, LinkedIn.

22 Q LinkedIn, of course.

1 Now I would like to turn to this case,
2 and I'd like to ask you how you first heard about
3 this case.

4 A It was mid May, and I received a phone
5 call from James and -- and -- and then an email from
6 James asking me if I would be interested in being an
7 expert witness.

8 Q Which you agreed to be an expert
9 witness in this case?

10 A I did.

11 Q Why did you agree to be an expert
12 witness in this case?

13 A I'll -- I'll confess by saying when --
14 when he told me that it's paid, I said, "Oh,"
15 because I was going to do it for free. But I --
16 because I think it -- this is an important topic,
17 and, again, the -- in my opinion the DoD is doing it
18 wrong and -- and doing it in a potentially harmful
19 way. And if that's what they truly want, it can be
20 done in a way that actually provides good results
21 all around.

22 Q Was the monetary compensation part of

1 it or was that irrelevant?

2 A It was irrelevant because I told -- I
3 told James, "I would have done it for me, but, okay,
4 if you're going to pay me, fine."

5 Q So you said that James reached out in
6 mid May. Is that around when you believe you were
7 retained as an expert?

8 A I think I was retained maybe third
9 week of May.

10 Q Okay.

11 A Around 19th, 20, 21st, thereabouts.

12 Q Okay. And before you agreed to
13 participate in this case, did you talk with anyone
14 at the Air Force about testifying in this case?

15 A No.

16 Q Did you talk to anyone at the
17 Department of Defense about participating in this
18 case?

19 A No.

20 Q Since that time, have you talked to
21 anyone at the Air Force or the Department of Defense
22 about your participation in this case?

1 A No.

2 Q Okay. Let's go back to your first
3 report, which we've marked as Exhibit 1.

4 A Uh-huh.

5 Q And I'd like to ask how you went about
6 preparing this report.

7 MR. CONNOLLY: Objection, vague.

8 Objection, form.

9 BY MR. ROBINSON:

10 Q Can you just describe at a high level
11 the process you underwent to prepare this report?

12 A I went over what the United States
13 Naval Academy was claiming as -- as their reasons
14 for doing this. And then I just went into breaking
15 each of those down and -- and through -- either
16 through my experience or sometimes pulling up
17 documents that the Naval Academy provided, I'd read
18 through and -- and I -- I formulated in my mind my
19 rebuttal.

20 Q Did you prepare the report yourself?

21 MR. CONNOLLY: Objection. You --
22 you -- objection. You may -- you may answer the

1 question, but do not reveal any communications
2 with -- with counsel.

3 THE WITNESS: You got it.

4 So yes, except for the format because
5 I didn't know what kind of format they wanted. So I
6 provided the raw text and the sources. And they
7 said they'll put it in the format that the court
8 likes. I says, "Good, because, you know, it's been
9 a while since I've been in school having to do those
10 kinds of things." That made it -- that would have
11 made it an extra pain.

12 BY MR. ROBINSON:

13 Q Did anyone assist you in preparing the
14 report?

15 A No.

16 Q In preparing these reports, did
17 counsel for the plaintiff provide you with any facts
18 or data that you considered in forming your
19 opinions?

20 MR. CONNOLLY: Objection. You may
21 answer the question. Please do not reveal any
22 communications that -- that you had with counsel.

1 THE WITNESS: Really, the only thing
2 that I needed from them besides the materials
3 that -- that the United States Naval Academy gave
4 was something that I theorized. And based on what
5 I had seen with the Air Force, on some briefings
6 that I had seen in the Air Force, base on a dearth
7 of -- well, a dramatic change in pers- -- in
8 percentage of cadets at the Air Force Academy who
9 choose to go to pilot training. And I'd seen over a
10 course of years where white cadets, 50 percent of
11 them want to go to flight pilot training. Hispanic,
12 50 percent. Asian, 50 percent. Native American,
13 American Indian, 50 percent. Black, 25 percent.
14 And I go, "What's going on here?"

15 And so I -- and part of that goes
16 toward when Air Force was trying to get racial --
17 rated diversity initiative. I saw that as a problem
18 right there because you've got to get them to want
19 to do it. And -- and so I said, "I wonder if the
20 same thing is happening at the Naval Academy." And
21 so I asked for that data.

22 BY MR. ROBINSON:

1 Q What data specifically did you ask
2 for?

3 MR. CONNOLLY: Objection. I'm going
4 to instruct the witness not to answer the question.
5 Per the protective order, communications between
6 counsel are privileged.

7 MR. ROBINSON: So I believe there's an
8 exception in the expert protocol and in Rule 26 for
9 facts or data provided by counsel to the witness
10 that the witness considered in forming his opinions.

11 My understanding based on the
12 witness's answer is that he relied on this data that
13 you provided in forming his opinions, so I think
14 we're entitled to ask what that data was.

15 MR. CONNOLLY: You -- your question,
16 if I remember it, was what data did you request from
17 your attorneys. Those are communications between --
18 between counsel and attorney that are protected by
19 the protective order.

20 MR. ROBINSON: Okay. Well, I disagree
21 that that question is improper, but I will rephrase
22 it, and maybe we can get to it another way.

1 MR. CONNOLLY: Okay.

2 BY MR. ROBINSON:

3 Q Did counsel for the plaintiff provide
4 you with data that you considered in forming your
5 opinions?

6 MR. CONNOLLY: Objection per the
7 protective order. This is a yes or no question, so
8 please answer the question yes or no.

9 THE WITNESS: Yes.

10 BY MR. ROBINSON:

11 Q What was that data?

12 MR. CONNOLLY: You -- you may answer.

13 THE WITNESS: I specifically asked for
14 demographics at the Naval Academy of what their
15 midshipmen were choosing career-wise to go into upon
16 graduation and commissioning.

17 BY MR. ROBINSON:

18 Q And did you receive that data?

19 A Yes.

20 Q You considered it in forming your
21 opinions?

22 A Yes.

1 Q Is there any other facts or data that
2 counsel provided you that you considered in forming
3 your opinions?

4 MR. CONNOLLY: Again, that is a --
5 sorry, objection. You may answer the question, and
6 that is a yes-or-no question.

7 THE WITNESS: No.

8 BY MR. ROBINSON:

9 Q Could you turn to page 61 of your
10 report. This is Appendix B.

11 This says: "In addition to the
12 documents referenced in my report, I relied upon
13 and/or considered the following documents."

14 A Uh-huh.

15 Q And it's a list of documents. Do you
16 see that?

17 A Yes.

18 Q Did you consider or rely on any other
19 documents not listed on this list or in your report?

20 A Not that I can remember.

21 Q Did counsel from the plaintiff ask you
22 to make any assumptions in forming your opinions?

1 A No.

2 Q Okay.

3 A I would have considered that improper
4 myself.

5 Q Well, I don't necessarily mean
6 anything improper. For example, if they told you,
7 "Assume for the sake of this exercise that the Naval
8 Academy considers race as a factor in the admissions
9 process, that could be an assumption."

10 Did they tell you anything like that?

11 A No.

12 MR. CONNOLLY: Objection, form.

13 THE WITNESS: No.

14 BY MR. ROBINSON:

15 Q Okay. And counsel -- I'll represent
16 to you that counsel informed us that you spent 57.5
17 hours preparation the report; is that correct?

18 A More or less. Yes.

19 Q Can you break down roughly how that
20 time was spent?

21 A Reading, writing, and rereading, and
22 then finding other things that might inform or

1 change what I was going to say, and then being --
2 and then more writing. And then in writing
3 remembering something else that I need to look up to
4 support what I was saying, and more reading and
5 then -- and then more writing.

6 MR. ROBINSON: This might be a good
7 time for our second break.

8 MR. CONNOLLY: Sure, okay.

9 MR. ROBINSON: Five minutes.

10 (A recess was taken)

11 BY MR. ROBINSON:

12 Q Okay, General Walker, welcome back.

13 A Many thanks.

14 Q And I'd ask you some more questions
15 about your report.

16 A Okay.

17 Q If we could look at pages 14 and 15 of
18 the report.

19 A Okay.

20 Q You provide a summary of your
21 conclusions here; is that correct?

22 A Yes.

1 Q I think we covered this before, but I
2 just want to be clear. You're not offering any
3 conclusions in this case on behalf of the United
4 States Government, correct?

5 A Correct.

6 Q Not offering any opinions on --

7 A Because they -- they think the
8 opposite of me, what I think, so...

9 Q Not offering any opinions on behalf of
10 the Department of Defense.

11 MR. CONNOLLY: Objection, form.

12 THE WITNESS: I'm not speaking for the
13 Department of Defense in any way, manner, shape or
14 form.

15 BY MR. ROBINSON:

16 Q You're speaking as a private citizen.

17 A I'm speaking as a private citizen.

18 Q And on page 14, Summary of
19 Conclusions, first sentence, you say: "I do not
20 believe that diversity of any type is harmful or
21 something to be resisted." And then you go on, but
22 I just want to ask you about that first sentence.

1 So do you think that diversity can be
2 helpful to an organization?

3 MR. CONNOLLY: Objection, form.
4 Objection, vague.

5 THE WITNESS: So I will specify by
6 saying my definition of diversity, yes.

7 BY MR. ROBINSON:

8 Q How can diversity in your definition
9 be helpful to an organization, in your view?

10 MR. CONNOLLY: Objection, form.
11 Objection, vague.

12 THE WITNESS: So I will give
13 circumstances where it has benefitted commanders in
14 the field in combat, in humanitarian aid situations
15 and -- and others. And on a broad scale, commanders
16 everywhere will -- will testify that having reserve
17 component people who have other jobs besides their
18 military do help the situation by -- by bringing in
19 some skill sets that the rest of the people in the
20 unit didn't have.

21 BY MR. ROBINSON:

22 Q Aside from that example, can you

1 explain, maybe more generally, how diversity in your
2 definition can be helpful to an organization?

3 MR. CONNOLLY: Objection, form.

4 THE WITNESS: People who have
5 experience in particular countries might be able to
6 help. I've -- I've found that actually in Japan
7 there's this -- one of our pilots was a Latter-Day
8 **Saints,** and he -- he did his mission in Japan. And
9 it helped having him around when we were doing any
10 kind of exercises with the Japanese Self-Defense
11 Force because he -- he would break the ice pretty
12 well and they would be going, "Oh, my God. How is
13 your Japanese so good?" I'd go, "Okay, he's got
14 them." And it would help the situation.

15 BY MR. ROBINSON:

16 Q Do you think that racial and ethnic
17 diversity can be helpful to an organization in some
18 circumstances?

19 MR. CONNOLLY: Objection, form.

20 Objection, vague.

21 THE WITNESS: I would have to dig to
22 find a circumstance where someone's skin color or

1 ethnicity, without having the cultural expertise to
2 back that up, would help anything.

3 BY MR. ROBINSON:

4 Q Sitting here today, you can't think of
5 any reason why racial or ethnic diversity could be
6 helpful to an organization?

7 MR. CONNOLLY: Objection, form.

8 THE WITNESS: No.

9 BY MR. ROBINSON:

10 Q Okay. Suppose that the Air Force had
11 no women. Do you think the Air Force would be worse
12 off as an institution if it had no women?

13 MR. CONNOLLY: Objection, form.

14 THE WITNESS: Quite honestly,
15 throughout history the -- the Air Force had, even
16 when it was Army Air Corps, did pretty doggone well
17 without women, but I -- but I would say right now
18 having women will maybe -- well, it -- it definitely
19 helps because now we have more to pick from. And so
20 having more, that means we cast a wider net and we
21 can find the best and brightest from men and women.

22 BY MR. ROBINSON:

1 Q Setting aside that aspect of it, that
2 it could increase the total number --

3 A And total number of --

4 Q -- of service members --

5 A -- of -- of stars as well. Again, by
6 casting a wider net, you're going to -- you're going
7 to catch the -- the star players.

8 Q Understood. So setting aside that
9 aspect of it, can you think of any problems that
10 would arise if the Air Force were consisted only of
11 men?

12 MR. CONNOLLY: Objection, form.
13 Objection, vague.

14 THE WITNESS: I will say this: The
15 only problems that would arise, in all seriousness,
16 would be political.

17 BY MR. ROBINSON:

18 Q Is it your same answer with respect to
19 racial diversity, do you believe that if the Air
20 Force were all white that it could be just as
21 effective as it is today?

22 MR. CONNOLLY: Objection, form.

1 Objection, calls for speculation.

2 THE WITNESS: That -- that -- that's
3 almost ridiculous to even imagine on its face,
4 unless we were back in segregation days, okay,
5 because there are plenty of black people who want to
6 fight for the country.

7 And so -- so in order for that to
8 happen, we would have -- we would have to be
9 blocking them from -- from -- and of course that
10 would cause serious -- serious political
11 repercussions, just like it did in the 1940s.

12 BY MR. ROBINSON:

13 Q So setting aside whether it would
14 plausibly happen and setting aside the political
15 repercussions, if you had an all white Officer
16 Corps, for example, but the enlisted corps were the
17 same racial and ethic makeup that it were today,
18 could you imagine that being a problem?

19 MR. CONNOLLY: Objection, form.
20 Objection, asked and answered.

21 THE WITNESS: You would end up with
22 people -- not only enlisted people, but everybody in

1 the United States going, "Why are you prohibiting
2 black people from being officers," which would mean
3 segregation.

4 But since we don't have segregation,
5 we -- we have the 1964 Civil Rights Act, that would
6 never happen. That would be -- that would be
7 something that would maybe be in a movie or -- or --
8 or a fiction book, but that would never happen in
9 reality.

10 BY MR. ROBINSON:

11 Q Okay. Let's suppose it's not
12 segregation, it's not prohibited. For whatever
13 reason, the enlisted -- the Officer Corps over time
14 becomes significantly less diverse, approaching an
15 all white Officer Corps.

16 Can you imagine how that could present
17 problems for the military if the enlisted ranks
18 continued to be racially and ethnically diverse?

19 MR. CONNOLLY: Objection, form.
20 Objection, calls for speculation. Objection, asked
21 and answered.

22 THE WITNESS: It would only matter if

1 you have bad leadership.

2 BY MR. ROBINSON:

3 Q Can I ask you, General Walker, if you
4 ever witnessed an example of racial prejudice in
5 your time in the military?

6 A In the military, no.

7 Q Have you ever witnessed it outside of
8 military?

9 A Oh, yes.

10 Q Okay. Can you think of a specific
11 example to share?

12 A Growing up in New York City, my
13 friends would ride bikes in the wrong neighborhood.
14 They would chase us out, "Get outta here, niggas."

15 Q Okay. What about in your adult life?
16 In your adult life as a black man in the United
17 States, have you witnessed racial prejudice either
18 directed towards you or toward others?

19 MR. CONNOLLY: Objection, form.

20 THE WITNESS: Only one I can remember
21 is down in -- when I was stationed at Biloxi Air
22 Force Base. I had worked at some outdoor festival,

1 or concert, and -- and -- and some guy made some
2 remark to me, racist remark to me, and said I
3 shouldn't even be walking in front of him. And I
4 said, "Mmm, okay, it still exists," but -- but --
5 but -- but other than that, no.

6 BY MR. ROBINSON:

7 Q You would agree with me that this
8 country has had a history of problems with racial
9 prejudice.

10 MR. CONNOLLY: Objection, form.

11 THE WITNESS: Yes, it's -- it's fully
12 documented.

13 BY MR. ROBINSON:

14 Q The military specifically has had
15 problems with racial prejudice, correct?

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: And that again has been
18 widely documented.

19 BY MR. ROBINSON:

20 Q One of the instances that's been
21 documented is race riots that occurred in the
22 military during the Vietnam war, correct?

1 MR. CONNOLLY: Objection, form.

2 THE WITNESS: Correct.

3 BY MR. ROBINSON:

4 Q Do you have a view as to why those
5 race riots took place?

6 MR. CONNOLLY: Objection, form.

7 THE WITNESS: I do.

8 BY MR. ROBINSON:

9 Q What is it?

10 A Back then the whole civil rights
11 movement was still in its -- in its -- in its
12 forming stages, and the United States was much
13 different then. I even -- I even grew up during
14 that time. I was like five to seven years old
15 when -- when these kinds of things were going on.
16 And -- and it was just a different country back
17 then.

18 Q The Officer Corps was more racially
19 homogenous, ethnically homogenous, than it is today
20 back then, correct?

21 MR. CONNOLLY: Objection, form.

22 Objection, lack of foundation.

1 THE WITNESS: That -- that is
2 well-documented as well.

3 BY MR. ROBINSON:

4 Q And do you think that could have
5 played a part in the racial unrest in the '60s
6 and '70s in the military?

7 MR. CONNOLLY: Objection, form.

8 THE WITNESS: I suspect it -- it was a
9 combination of things. For instance, socioeconomics
10 and people who were able to either defer and go to
11 college and then become officers or go into the
12 Guard were mainly those with means, and there were a
13 lot more white people with means.

14 Then I also suspect that maybe --
15 well, definitely were some people who would
16 outwardly be racist and not even -- not subtly,
17 but they would -- they would actually throw their
18 racism in your face back then. That would --
19 nowadays that would get somebody out -- that would
20 be somebody kicked out court-marshaled in 30
21 seconds, whereas back then it was tolerated.

22 And so -- and if in certain areas,

1 those who were in combat, especially fighting
2 side-by-side and having bullets coming at them and
3 then returning fire together, that wasn't happening.
4 It was happening in places where -- where they
5 weren't in the crap together. And -- and -- and
6 it -- it -- I suspect that after a while there's,
7 without being able to fight together, no cohesion
8 builds up and it's easier for people to become
9 tribal and take sides.

10 BY MR. ROBINSON:

11 Q You mentioned that in your report,
12 too, that you believed there was a relative lack of
13 racial tensions in combat areas, specifically. And
14 I wanted to ask you what your basis for that was.

15 MR. CONNOLLY: Objection, form.

16 THE WITNESS: From talking to people
17 who fought in the Vietnam conflict.

18 BY MR. ROBINSON:

19 Q Okay.

20 A And -- and it also documented, you
21 might want to read about -- he eventually made
22 Brigadier General, but Brigadier General Robin Olds,

1 and back then he was a Colonel. And then Chappie
2 James back then was a Colonel, but he eventually
3 became a 4-star. But they -- they worked together
4 and -- and everyone respected them because they
5 worked together as such a team. And they were able
6 to do some spectacular things in Vietnam with their
7 fighters.

8 Q Okay. So you -- you said you talked
9 to people. You -- did you read books by these
10 individuals or -- or --

11 A These are -- this is something as an
12 officer, a professional officer in the United
13 States, should be aware of history and know what --
14 at least have an idea of what caused certain wars,
15 what caused certain friction within the war, where
16 things went right, where things went wrong at.
17 Because without studying that -- because our enemies
18 are. And if we don't study that, the enemies
19 will -- will use some of those same things to defeat
20 us.

21 That being said, throughout my --
22 throughout my military career, just talking with

1 people who were old-timers, either retired or still
2 serving but served during Vietnam, out of curiosity,
3 professional curiosity, you have to ask, okay, what
4 was happening back then.

5 Q Take your point about officers should
6 know the history of this country --

7 A Uh-huh.

8 Q -- and the causes, but you yourself
9 are not a historian, right?

10 A No. No.

11 MR. CONNOLLY: Objection, form.

12 BY MR. ROBINSON:

13 Q And did you -- you did review the
14 expert reports prepared by Beth Bailey and John
15 Sherwood in this case, correct?

16 A Bailey and Sherwood, I did a skim.

17 Q Okay. Do you recall anything sitting
18 here today that you disagreed with in their reports?

19 A With them -- doing data stuff, I need
20 to -- I need to do -- I need to respond to things
21 where I am actually an expert, and so I -- I -- I
22 did a brief skim and left those alone.

1 Q You view your approach as more
2 data-driven as opposed to qualitative or historical?

3 A Both. All of the above.

4 Q Okay. Would you agree with me that
5 racial prejudice exists in the military today?

6 A Oh, yes.

7 MR. ROBINSON: I'm going to mark an
8 exhibit, Exhibit 3.

9 (Deposition Exhibit 3 marked)

10 BY MR. ROBINSON:

11 Q This is a Report of Inquiry,
12 Independent Racial Disparity Review done by the
13 Inspector General of the Department of the Air Force
14 dated December 2020.

15 I believe you referenced it in your
16 report, correct?

17 A Yeah, and during this deposition.

18 Q Yes.

19 MR. CONNOLLY: One moment. Do you
20 need to review this document or --

21 THE WITNESS: Oh, no. Believe me, I
22 have spent a lot of time in the Pentagon with this

1 document, so...

2 BY MR. ROBINSON:

3 Q I will represent to you -- you
4 probably would have noticed -- this is not the full
5 report.

6 A Oh, no, no.

7 Q So the full report is I think 150
8 pages. This is just an excerpted portion of the
9 section that I wanted to --

10 A Okay.

11 Q -- discuss with you.

12 MR. CONNOLLY: And Counsel, may I --
13 may I ask: I see highlighted portions on page, you
14 know, 92 and 93. Is that the original or is that
15 new?

16 MR. ROBINSON: That is in the
17 original. I did not add that highlighting.

18 MR. CONNOLLY: Okay, thank you.

19 BY MR. ROBINSON:

20 Q Okay. Would you turn to page 91 of
21 this report, please.

22 MR. CONNOLLY: And I believe you said

1 this already. This document appears to be an
2 excerpt of a larger report, correct?

3 MR. ROBINSON: That's correct. It's
4 an excerpt of I believe the introduction and the
5 section -- the part of section 2 called The Voice of
6 the Airman and Space Professionals.

7 MR. CONNOLLY: Okay.

8 BY MR. ROBINSON:

9 Q All right. This was a survey question
10 that was asked airmen, and the question was, "Do you
11 agree or disagree" with this statement: I trust my
12 chain of command to address racism, bias, and
13 unequal opportunities regarding all enlisted
14 officers and civilians.

15 And 40 percent of black enlisted
16 airmen said they disagree with that statement,
17 correct?

18 A 40 percent, yes.

19 Q And 40 percent of black officers said
20 that they disagree with that statement, correct?

21 A Correct.

22 Q Would you have agreed with this

1 statement when you were in the military?

2 A No.

3 Q Why do you disagree with this
4 statement?

5 MR. CONNOLLY: Ob- -- sorry.
6 Objection. Objection, vague. When you say
7 statement, you mean the "I trust my chain"?

8 Thank you.

9 THE WITNESS: Because answering
10 that -- that statement, I've always had good
11 commanders.

12 BY MR. ROBINSON:

13 Q Just -- yeah, I'll clarify. I think
14 it might be a little confusing.

15 So the statement is: I trust my chain
16 of command to address racism and bias and unequal
17 opportunities regarding all enlisted officers and
18 civilians.

19 Do you agree or disagree?

20 A I agree.

21 Q You agree. 40 percent of black
22 officers disagreed, correct?

1 A And -- and again, that's a perception
2 thing. And maybe they've run across bad leadership.

3 Q Okay. Do you think that's a problem,
4 that 40 percent of black officers feel that way?

5 A I do.

6 Q Could we turn to page 99.

7 A Uh-huh.

8 Q The statement here is: I believe
9 black service members are less likely to receive the
10 benefit of the doubt in Air Force discipline.

11 And you see 59 percent of black
12 enlisted airmen agree with that statement, correct?

13 A Correct.

14 Q And do you see 64 of black officers
15 agree with that statement, correct?

16 A Correct.

17 Q Do you agree or disagree with that
18 statement?

19 MR. CONNOLLY: Objection, form.

20 THE WITNESS: Based on the units that
21 I have been in, I would have said no.

22 BY MR. ROBINSON:

1 Q Okay. But you can understand that
2 different officers enlisted with different
3 experiences.

4 A Oh, yes.

5 Q Page 101. Here this statement is: I
6 have seen bias as it relates to career development
7 opportunities for enlisted civilian and officer
8 black airmen and space professionals.

9 41 percent of black enlisted airmen
10 say that agree, correct?

11 A Correct.

12 Q 50 percent of black officers say they
13 agree, correct?

14 A Correct.

15 Q Would you agree or disagree with this
16 statement?

17 A Again, from my career I would
18 disagree.

19 Q Okay. But it's possible that it
20 exists because 50 percent of black officers, for
21 example, are saying they've seen it.

22 MR. CONNOLLY: Objection, form.

1 THE WITNESS: It's possible that it
2 exists.

3 BY MR. ROBINSON:

4 Q And page 102. This is a question:
5 Have you ever been discriminated against by a member
6 of the Department of the Air Force because of your
7 race or ethnicity?

8 50 percent of black airmen said yes.
9 48 percent of black officers said yes.

10 Is that accurate?

11 A That's what it shows.

12 Q And you would answer that question
13 how?

14 A No.

15 And now I will also say this: This is
16 a perception. If 50 percent of them in today's Air
17 Force actually did get discriminated against because
18 of their race or ethnicity, those commanders would
19 be relieved and maybe even prosecuted.

20 Q Have you ever heard of a commander
21 being relieved or prosecuted for racial
22 discrimination?

1 MR. CONNOLLY: Objection, form.

2 THE WITNESS: No.

3 BY MR. ROBINSON:

4 Q So do you doubt the honesty of those
5 respondents who said they have been a victim of
6 discrimination?

7 MR. CONNOLLY: Objection, form.

8 THE WITNESS: I don't doubt. It's
9 their perception. I cannot know what's going on
10 inside their head, and in those particular
11 circumstances I wasn't there.

12 BY MR. ROBINSON:

13 Q Can we turn to page 20 of your report,
14 please.

15 I think we are done with this exhibit
16 at least for now, so we can go back to Exhibit 1,
17 which is your report.

18 A Which page?

19 Q Page 20.

20 A Gotcha.

21 Q So here you include a -- a relatively
22 lengthy quote from General Colin Powell talking

1 about the essence of leadership in military
2 settings, correct?

3 A Correct.

4 Q And you say that you quoted General
5 Powell at length because every word of his
6 explanation has been true in your experience,
7 correct?

8 A Correct.

9 Q Okay. You and General Powell are both
10 sons of Jamaican immigrants, correct?

11 A Yes.

12 Q You both grew up in New York City --

13 A Yep.

14 Q -- correct?

15 A I even met him one time and talked
16 about that, and we -- we both reverted to our
17 Jamaican patois to talk to each other.

18 Q That was my next question, was whether
19 you had met him. So you did meet him.

20 A Yes.

21 Q When was this?

22 A It was 20 -- summer of 2018 when I was

1 going through what the Air Force calls the Senior
2 Leader Orientation Course. It's sort of the
3 introduction to being a general officer, and all
4 generals have to go through it.

5 Q And you talked about your upbringings
6 in New York, did you say?

7 A Did.

8 Q Okay. Did you talk about diversity
9 issues at all --

10 A No.

11 Q -- with him? Okay.

12 What's your opinion of General Powell?

13 A I think he's a great leader. He knows
14 how to talk to his troops. He knows how to -- to --
15 to get them to trust him. He -- he knows how to --
16 he knows how to listen and how to reach people.

17 MR. ROBINSON: I am marking Exhibit 4.

18 (Deposition Exhibit 4 marked)

19 MR. ROBINSON: Sorry for the delay.

20 THE WITNESS: Thank you so kindly.

21 BY MR. ROBINSON:

22 Q Represent to you these are remarks

1 that General Powell gave at a dinner in November of
2 2021.

3 MR. CONNOLLY: If you've never seen
4 these remarks before --

5 THE WITNESS: I'll -- I'll need some
6 time to read this.

7 BY MR. ROBINSON:

8 Q Take your time.

9 Have you had an opportunity to review
10 this document?

11 MR. CONNOLLY: He's still reading.

12 THE WITNESS: I'm still reading.

13 BY MR. ROBINSON:

14 Q Take your time.

15 A Ready for you.

16 Q And I'll just direct your attention to
17 a couple passages.

18 A Uh-huh.

19 Q So first, the fourth paragraph of his
20 remarks --

21 A Uh-huh.

22 Q -- he says, "America is a nation of

1 nations made up of people from every land, of every
2 race, and practicing everything faith. Our
3 diversity is not a source of weakness, it is a
4 source of strength. It is a source of our success.
5 We are a country of countries drawing from every
6 country in the world and contributing to every
7 country in the world."

8 My question is just do you agree with
9 that statement.

10 MR. CONNOLLY: Objection, form.
11 Objection.

12 THE WITNESS: I agree with what he's
13 trying to say with diversity defined my way. I
14 don't think he's -- even though he's talking to
15 mostly Muslims in that audience, as the Secretary of
16 State in order to quell unrest throughout the
17 country, a lot of people blaming every Muslim for --
18 for terrorism acts, he's trying to bring the country
19 together in these remarks. And so in that -- that
20 context, yes, I agree.

21 BY MR. ROBINSON:

22 Q Is there any aspect of this statement

1 that you disagree with?

2 MR. CONNOLLY: Objection, form.

3 THE WITNESS: With diversity defined
4 my way, then the answer is no, there's no part that
5 I disagree with.

6 BY MR. ROBINSON:

7 Q Okay. What about diversity defined as
8 any of the characteristics that can describe an
9 individual including their demographic
10 characteristics such as race and ethnicity, as well
11 as other characteristics such as their religion,
12 their political identity, et cetera?

13 MR. CONNOLLY: Objection, form.

14 Objection, vague.

15 THE WITNESS: And I will say that that
16 really doesn't enter into it, because in my travels
17 around the world I have met Muslims of every type,
18 of every skin color, of every race. And so you'll
19 find Muslims in China, you'll find Muslims in
20 Chechnya, you'll find Muslim -- you'll find people
21 in the Middle East who have a complexion as dark as
22 mine but they won't call themselves black. But

1 again, all of that goes back to diversity. If it
2 means you understand the culture and understand the
3 language and -- and familiar with the practices and
4 culture that -- of that religion, then fine. But by
5 skin color, not so much.

6 BY MR. ROBINSON:

7 Q You think skin color is irrelevant.

8 MR. CONNOLLY: Objection, form.

9 THE WITNESS: I -- as far as the --
10 the sentence of source of weakness, source --
11 it's -- so it's irrelevant. It's neither a source
12 of weakness, it's neither -- or a source of
13 strength.

14 BY MR. ROBINSON:

15 Q If you turn to the third page of his
16 remarks. This is the fifth sentence down the page,
17 starts with: "I was very moved."

18 A Yes.

19 Q He says --

20 MR. CONNOLLY: Sorry, where -- oh,
21 fifth paragraph?

22 MR. ROBINSON: Yes.

1 BY MR. ROBINSON:

2 Q He says: "I was very moved by some of
3 the conversations that we had at our table as we
4 talked about discrimination, we talked about
5 profiling, as we talked about how we have to be
6 sensitive to each other and to be sensitive to the
7 diversity that we all represent. This touched me
8 deeply because I am a minority. I have been
9 profiled. I will never forget my background. I
10 will never forget those who came before me; did so
11 so that I can be in this position today."

12 Do you agree with the sentiment in
13 this paragraph?

14 MR. CONNOLLY: Objection, form.
15 Objection, vague.

16 THE WITNESS: So let me break it down
17 a little -- little bit here.

18 You have to remember that this
19 occurred less than two months after the 9/11
20 attacks. And he is -- he is talking to them as
21 Secretary of State. And thus, he has been given a
22 job. Now -- but that's one.

1 Two, what he said about him being
2 profiled, I'm -- I'm not surprised. He's -- he's
3 older than me, so -- so he saw some things that I
4 didn't see.

5 And so -- but even still, as a
6 youngster, like I said, in New York City, I've gone
7 through some racial incidents and profiling, but,
8 again, not in the military, so --

9 So to answer all that, based on his
10 background and what he was trying to do to meld the
11 friction that was happening, not just in New York
12 but around the nation with people blaming Muslims,
13 all Muslims for 9/11, he was doing his job, and I --
14 there's nothing I disagree with in that.

15 BY MR. ROBINSON:

16 Q Okay. I think you said he was -- he
17 was given a job? Were you suggesting that he might
18 not actually believe what he was saying here?

19 MR. CONNOLLY: Objection, form.

20 THE WITNESS: No, no, I -- I believe
21 he believes it, but he was given the job. He made
22 sure to mention President Bush, and he was sent

1 there to quell things.

2 I don't believe he would say anything
3 he doesn't mean, from what I know of him.

4 MR. ROBINSON: Mark the next exhibit
5 as Exhibit 5.

6 (Deposition Exhibit 5 marked)

7 BY MR. ROBINSON:

8 Q These are remarks that Secretary Esper
9 gave in June of 2020. Feel free to take a look at
10 them. As before, I will direct you to particular
11 portions of this document.

12 MR. CONNOLLY: So again, take your
13 time to review, read, until you're comfortable with
14 this document.

15 THE WITNESS: You got it.

16 I was in the Pentagon when all of this
17 was going on, so I -- I'm really just skimming it
18 because I -- I know what he was saying.

19 BY MR. ROBINSON:

20 Q You had met -- have you met Secretary
21 Esper before?

22 A I -- I -- I was in the room with him

1 maybe once, but -- but not like I went up and shook
2 hands. As a 1-star, you know, you've got to be
3 invited to come up and talk to him.

4 Q So on the second page, second full
5 paragraph, he's talking about the excellence of the
6 military.

7 A Uh-huh.

8 Q And he says: "Our military has also
9 reached this level of excellence because we attract
10 the best America has to offer. Young men and women
11 across the land and beyond our shores who not only
12 love our country and share these values, but who
13 also represent a wide range -- creeds, religions,
14 races, ethnicities, sexual orientations, and other
15 attributes -- that not only distinguish us as
16 individuals but also make us stronger when combined
17 together."

18 Do you agree or disagree with
19 Secretary Esper's judgment reflected in this
20 paragraph?

21 MR. CONNOLLY: Objection, form.

22 THE WITNESS: I would agree

1 wholeheartedly if he had used the word "and" instead
2 of "but."

3 BY MR. ROBINSON:

4 Q Why do you disagree with the "but"?

5 MR. CONNOLLY: Objection, form.

6 THE WITNESS: Because in my
7 interpretation of that sentence, the "but," he's
8 trying to say, "that means what I say after this
9 'but' is what really makes that diversity
10 important." And I -- and quite honestly, races and
11 sexual orientations, I don't see how that's
12 relevant, okay? Ethnicities, maybe because you can
13 maybe understand the -- the -- the culture of some
14 of our allies. Their religion, same thing. The
15 creeds. But -- but the other two, I go no.

16 BY MR. ROBINSON:

17 Q And how can ethnicity help you
18 understand a different culture?

19 A It only can if you actually came up in
20 that culture or -- or at least your parents raised
21 you up with a good rich understanding of that
22 culture. There are plenty of people who are certain

1 ethnicity and cannot speak that language but don't
2 know anything about it. Sometimes because their
3 parents wanted them to just be American, and then
4 there are others who said, no, we're not going to
5 forget the old country. But different people are
6 different.

7 Q Could I direct your attention to the
8 third page of his remarks.

9 A Uh-huh.

10 Q The third and fourth paragraphs. He
11 says: "A diverse and inclusive DoD draws out and
12 builds upon the best in each of us. It builds
13 esprit de corps, forges teamwork, brings out the
14 best between us. In short, it brings out the best
15 in America. Over the past week, I have had the
16 opportunity to speak with the senior civilian and
17 military leadership, both officer and enlisted, on
18 the topic of racial diversity. We all agree that it
19 is time to lead once again on this issue as
20 America's most respected institution and a globally
21 recognized leader when it comes to building diverse
22 winning teams and creating opportunity for all."

1 Do you agree with those statements?

2 MR. CONNOLLY: Objection, form.

3 THE WITNESS: So --

4 MR. CONNOLLY: Objection, vague.

5 THE WITNESS: So first paragraph, to
6 me, I agree with it using my definition of diverse.

7 And inclusive means good leadership. And so there's
8 nothing wrong with that.

9 Now, inclusion the way that the DoD as
10 well as a lot of other organizations that try to do
11 it, they're trying to say it means more -- more of a
12 certain race.

13 Inclusion, in my opinion, means that
14 if you're a good leader then all of the people on
15 your team matter and they -- and they feel as if
16 they matter.

17 So that being said, that's -- that's
18 the first paragraph.

19 Second paragraph --

20 BY MR. ROBINSON:

21 Q Let me stop you there on the first, if
22 that's okay.

1 A Uh-huh.

2 Q And I'll definitely give you an
3 opportunity to answer the second paragraph.

4 A Yes.

5 Q But just on the first paragraph, are
6 you familiar with the Department of Defense's
7 definition of diversity?

8 A I -- I have read it, but -- but --
9 yes.

10 Q Okay.

11 A But in -- I'm in the meetings, and
12 really all they are talking about is color of skin,
13 sexual orientation and/or sex.

14 Q And I won't -- I won't hold you to the
15 precise wording --

16 A Right.

17 Q -- but you at least understand, I
18 believe you said, that their definition of diversity
19 includes racial diversity, for example.

20 A Yes.

21 Q Includes ethnic diversity.

22 A Uh-huh.

1 Q Okay. Includes other characteristics
2 as well.

3 A Yes.

4 Q And you mentioned some of them.

5 A Uh-huh.

6 Q With that definition of diversity, do
7 you agree with Secretary Esper's statement that "A
8 diverse and inclusive DoD draws out and builds upon
9 the best of each of us. It builds esprit de corps,
10 forges teamwork, brings out the best between us, it
11 brings out the best in America"?

12 MR. CONNOLLY: Objection, form.
13 Objection, vague.

14 THE WITNESS: I will say that I
15 partially agree. If they weren't including race,
16 sex, sexual orientation.

17 BY MR. ROBINSON:

18 Q So you disagree that racial and ethnic
19 diversity and inclusivity forges teamwork, brings
20 out the best between us?

21 MR. CONNOLLY: Objection, form.
22 Objection, vague.

1 THE WITNESS: Yes, I disagree.

2 BY MR. ROBINSON:

3 Q Okay. Next paragraph, I won't read it
4 again, but I want to give you an opportunity to
5 explain what you agree with and what you disagree
6 with.

7 A So I look at it in the context of the
8 Sec Def and he's talking to his senior people. And
9 for a topic like this, I don't see any of them
10 having the guts to go and to say, no, I don't think
11 so.

12 And so -- so if he says that he's
13 talked to and all agree, maybe, but were there any
14 of them who, if he said, "Hey, look, Chatham House
15 Rules, just tell me what you really think," they
16 might have said something different.

17 Q Do you have any basis to believe that
18 Secretary Esper did not mean what he was saying in
19 this paragraph?

20 A Well, I believe he means what he said.

21 Q Okay. But you disagree with it,
22 correct?

1 A I do.

2 MR. CONNOLLY: Objection, form.

3 THE WITNESS: A topic --

4 MR. CONNOLLY: Objection, vague.

5 THE WITNESS: -- of racial diversity,
6 that's -- that's the part I disagree with.

7 BY MR. ROBINSON:

8 Q You disagree that the Department of
9 Defense should be a globally recognized leader when
10 it comes to building racially diverse, winning
11 teams, and creating opportunity for all?

12 MR. CONNOLLY: Objection, form.
13 Objection, misstates testimony.

14 THE WITNESS: I -- again, I don't
15 think, unless it's for political reasons, that the
16 Department of Defense has to lead on increasing
17 certain racial proportions.

18 BY MR. ROBINSON:

19 Q Let me do one more exhibit, and then
20 maybe we can break for lunch.

21 A The one that's read from page -- the
22 second page, it says, "We attract the best America

1 has to offer," and that goes back to what I've been
2 trying to say with the professional athlete model,
3 we're looking for the best.

4 MR. ROBINSON: This will be Exhibit
5 6.

6 (Deposition Exhibit 6 marked)

7 THE WITNESS: Thank you so kindly.

8 BY MR. ROBINSON:

9 Q This is a brief that General Julius
10 Becton and others submitted in connection with a
11 Supreme Court, Fisher v. University of Texas at
12 Austin.

13 A Uh-huh.

14 Q Have you seen this brief before?

15 A I have not.

16 MR. CONNOLLY: Objection. Oh, sorry.
17 If he's going to be asking you questions about this,
18 take your time, review the document, and let us know
19 when you're ready to talk about it.

20 THE WITNESS: All right. Take a look
21 at that.

22 MR. CONNOLLY: It's a long document.

1 BY MR. ROBINSON:

2 Q I don't mean to cut you off, but --

3 A Actually, I -- I -- I've read through
4 the parts where I -- I get what they're trying to
5 say.

6 Q And I'll --

7 MR. CONNOLLY: You -- just for the
8 record, you skimmed through the Summary of Argument?

9 THE WITNESS: Yes.

10 MR. CONNOLLY: Okay.

11 THE WITNESS: I pretty much went
12 straight to that because I said that will tell me
13 what they're trying to say.

14 BY MR. ROBINSON:

15 Q And I'll direct you to some portions
16 of this.

17 A Okay.

18 Q And if you'd like some more time to
19 read the context, just let me know.

20 A Okay.

21 Q But first some introductory questions.
22 So you said you had never seen this

1 brief before.

2 A Correct.

3 Q Do you know General Becton?

4 A I do not.

5 Q Okay. What about the other
6 individuals listed on the first page or the second
7 page? These are all the signatories to the brief.
8 Do you recognize any of these individuals?

9 A I recognize -- so I've met General
10 Abizaid once while I was a captain. I know of
11 Admiral Blair. I know of Clark. And I'm very, very
12 familiar with General Fogleman, who was the Former
13 Chief of Staff of the Air Force and I guess the last
14 general officer that threw his stars on the table
15 when he disagreed with what the senior leadership
16 wanted.

17 MR. CONNOLLY: Are you asking him
18 about the --

19 BY MR. ROBINSON:

20 Q Yeah, let's turn --

21 MR. CONNOLLY: -- second page here?

22 BY MR. ROBINSON:

1 Q Let's turn to the second page. And
2 same question.

3 A Okay.

4 Q Are you familiar with these officers?

5 A I know of General Keen, I know of
6 Senator Kerry, I know of and met General Lester
7 Lyles, I know of Admiral Mike Mullen, of General
8 Mundy, Colin Powell, General Shelton, General Johnny
9 Wilson, and General (indiscernible), yes.

10 Q You mentioned General Fogleman. I
11 think you mentioned some special involvement with
12 him. What was --

13 A No, not --

14 MR. CONNOLLY: Objection, form.

15 THE WITNESS: No special involvement
16 with him. We -- we -- we just cheered, many of us
17 cheered him when he -- he chose to leave the job of
18 Chief of Staff of the Air Force and retire early
19 rather than go along with -- he felt so strongly
20 about something that he -- he did what any honorable
21 general would do.

22 BY MR. ROBINSON:

1 Q Do you know why specifically he
2 retired?

3 A There -- there were policies that the
4 Sec Def and the Sec Def of the Air Force were
5 pushing that he disagreed with, and -- and in his
6 mind he couldn't morally continue to go forward in
7 that position.

8 Q Which policies were those?

9 A It will -- it will come to me in a
10 little bit.

11 Q Do you recall whether it was diversity
12 and inclusion?

13 A No. It wasn't that, no.

14 Q Okay.

15 A It was -- it was involving combat
16 power.

17 Q Okay. He signed this brief --

18 A Uh-huh.

19 Q -- in 2012.

20 MR. CONNOLLY: Objection, form.

21 Objection, lack of foundation.

22 BY MR. ROBINSON:

1 Q Do you know?

2 A I don't know. If -- if that's what
3 it's dated, then, yeah, fine.

4 Q Would you turn to page 1 of this
5 brief. And again, I'm talking to -- I'm talking
6 about actual number 1, not the Roman numeral.

7 A Got it, number 1. Got it.

8 Q Right after a summary of the argument,
9 first sentence: "For the United States Military, a
10 highly qualified and racially diverse Officer Corps
11 is not a lofty ideal. It's a mission critical
12 national security interest."

13 Do you agree or disagree with that
14 judgment?

15 MR. CONNOLLY: Objection, form.
16 Objection, vague.

17 THE WITNESS: Again, as I've stated
18 earlier, racially diverse is not -- is not the
19 important thing. It's important politically, but
20 it's not for combat power, so -- so that's my
21 answer.

22 BY MR. ROBINSON:

1 Q So just to be clear, yes, you disagree
2 that a racially diverse Officer Corps is a mission
3 critical national security interest.

4 MR. CONNOLLY: Objection, form.
5 Objection, asked and answered.

6 THE WITNESS: Yeah, I disagree.

7 BY MR. ROBINSON:

8 Q Same paragraph, later on, the brief
9 says: "Based on decades of experience, the modern
10 United States military regards a highly qualified
11 and racially and ethnically diverse Officer Corps as
12 vital to military effectiveness."

13 You disagree with that statement,
14 correct?

15 MR. CONNOLLY: Objection, form.

16 THE WITNESS: Correct.

17 BY MR. ROBINSON:

18 Q You disagree with the judgment of the
19 officers who signed this brief --

20 MR. CONNOLLY: Objection.

21 BY MR. ROBINSON:

22 Q -- correct?

1 MR. CONNOLLY: Sorry. Objection,
2 form. Objection, asked and answered.

3 THE WITNESS: Correct.

4 BY MR. ROBINSON:

5 Q Okay. I think we'll take a break now.
6 We can take a lunch break if that works.

7 A Okay, that will work.

8 MR. ROBINSON: Go off the record.

9 (A luncheon recess was taken)

10 BY MR. ROBINSON:

11 Q Welcome back, General Walker.

12 A Nice to be back. Thank you so kindly.

13 Q During the lunch break, did you talk
14 about your testimony at all with counsel?

15 A We -- we made sure not to. We had to
16 keep it on sports, House of the Dragon, and
17 vacations.

18 Q Very good. General Mark Milley, have
19 you met him before?

20 A No.

21 Q Do you have an opinion of him?

22 A Yes.

1 Q What is it?

2 A I don't like -- I think he's very
3 political. I mean, he's really, really political.
4 And the very first time that he said that he -- he
5 kept close contact with his equivalent in the PRC to
6 give them warning if anything was coming, I said,
7 "And he said that out loud? And why is he still the
8 chairman? Okay."

9 Then afterwards with that disastrous
10 pullout in Afghanistan that they had to scramble at
11 the end to kind of salvage and still -- and still
12 stayed, now that he's retired, he went on the record
13 with the media and said, "Yeah, I tried to tell them
14 not to do that."

15 I go, "Then -- then why didn't you
16 throw your stars down on the table?" Because that
17 would have made a statement that probably would have
18 changed what happened and we could have done it a
19 lot better.

20 But again -- so yeah. So my opinion
21 of him is not high.

22 Q Okay. Well, I'll show you an article

1 about something he said.

2 A Uh-huh.

3 Q This is from the Association of the
4 United States Army.

5 MR. ROBINSON: This will be Exhibit 7.

6 (Deposition Exhibit 7 marked)

7 THE WITNESS: Many thanks.

8 BY MR. ROBINSON:

9 Q And General Milley, he was chairman of
10 the Joint Chiefs, correct?

11 A Correct.

12 Q Okay.

13 MR. CONNOLLY: Take your time to look
14 through this document, and when you're ready to talk
15 about it --

16 THE WITNESS: Got it.

17 MR. CONNOLLY: Let us know.

18 THE COURT: This is one that I haven't
19 read before. I'm usually pretty up to speed on...

20 All right.

21 MR. CONNOLLY: And real quick, I'd
22 just like to note for the record that it's unclear

1 to me from looking at the document where -- where
2 this was pulled from or -- or who wrote it.

3 MR. ROBINSON: Sure. If you --

4 MR. CONNOLLY: I just want to make
5 that clear.

6 MR. ROBINSON: Sure. If you look at
7 the last page.

8 THE WITNESS: For this, from the AUSA
9 website where they keep a lot of their -- that's
10 what I figured because this is where I see the stuff
11 like this.

12 MR. ROBINSON: That's correct. I
13 pulled it from that website.

14 THE WITNESS: Uh-huh.

15 MR. CONNOLLY: Okay.

16 BY MR. ROBINSON:

17 Q Just going to read the first few
18 lines.

19 A Yes.

20 Q "The military's diversity and
21 inclusion efforts are not just for diversity's sake
22 but are critical to the readiness and capability of

1 the joint force, the military's top general said.
2 It's diversity to improve the system, improve the
3 military, improve our problem solving capabilities,
4 and improve our work body and readiness in order to
5 protect and defend the constitution, Joint Chiefs
6 Chairman, General Mark Milley, said September 24th
7 during a virtual town hall. That's why it's so
8 important, so fundamental, that we have this as one
9 of our elements as we move forward to continue to
10 develop the joint force, he said."

11 Do you agree with that statement by
12 then Joint Chiefs Chairman, General Milley?

13 MR. CONNOLLY: Objection, form.
14 Objection, vague.

15 THE WITNESS: I will say using
16 diversity in my definition, yes.

17 BY MR. ROBINSON:

18 Q What about using diversity to include
19 racial and ethnic diversity? Do you agree with his
20 statement then?

21 MR. CONNOLLY: Objection, form.
22 Objection, vague.

1 THE WITNESS: I would say that's his
2 opinion and race or color of skin and things like
3 that in it, then it doesn't make sense to me.

4 BY MR. ROBINSON:

5 Q You would disagree.

6 A I would disagree.

7 Q And he was speaking as the Joint
8 Chiefs Chairman.

9 A Correct.

10 MR. ROBINSON: This will be Exhibit 8.

11 (Deposition Exhibit 8 marked)

12 THE WITNESS: Thank you so kindly.

13 BY MR. ROBINSON:

14 Q This is an amicus brief submitted in
15 this case, the case against the Naval Academy, on
16 December 6, 2023.

17 As you'll see on the first page, it
18 says it's the brief of the National Association of
19 Black Military Women, the American Civil Liberties
20 Union of Maryland, and the NAACP Legal Defense Fund.

21 Do you see where it says that?

22 A I do.

1 Q I'm sorry, can we switch copies? That
2 one is marked up.

3 A All right, excellent.

4 I said, "How nice of you to have the
5 tabs for me." All right.

6 Q And I'll give you an opportunity to
7 review this document, but first initial question,
8 have you seen this before?

9 A I don't remember reading this one.

10 Q Fair enough. So feel free to take a
11 moment to review it, and let me know when you're
12 ready.

13 MR. CONNOLLY: As he said, review the
14 document, take your time. When you are ready to
15 talk about it, let us know.

16 BY MR. ROBINSON:

17 Q As before, I'll direct you to
18 particular portions and provide you an opportunity
19 to review context if you would like.

20 With that, would you like to continue
21 reading or are you --

22 A Yes, I -- I am going through just

1 their main arguments here. This is stuff that I've
2 seen before, other people arguing, so...

3 Q Ready?

4 A Like Freddie.

5 Q I think you said that you had seen
6 some of this before. Did I hear that correct?

7 A No, some of the statements that they
8 make, they are sometimes word for word, sometimes
9 slightly changed, but the same sentiments through
10 other arguments I've seen or other things going
11 through the Pentagon, so...

12 Q Which statements specifically do you
13 recall seeing before?

14 A So statements about saying that the
15 lack of leadership is -- is -- is causing rampant
16 racial discrimination. I don't know if it's
17 rampant, but like, okay. I -- I -- I can agree,
18 poor leadership, so --

19 And other things where they are
20 saying, hey, they -- the repeat the -- the
21 percentage of officers and percentage of enlisted
22 of -- of white and minority. And so it's the same

1 sort of arguments they use.

2 Q So you've seen that point before
3 that -- at the Pentagon that the lack of a diverse
4 Officer Corps can contribute to the racial
5 discrimination?

6 MR. CONNOLLY: Objection, form.

7 THE WITNESS: No.

8 BY MR. ROBINSON:

9 Q Okay, then maybe I misunderstood.
10 What statement had you seen --

11 A Poor leadership.

12 Q -- before?

13 A Them saying that leadership is
14 allowing this sort of thing to happen, it's going to
15 affect our -- our service members.

16 Q Okay.

17 A Thus, you'll see in -- at least in
18 most of these cases when they did the investigation
19 they cashiered the people who were doing that.

20 But again, I will say that, you know,
21 it shouldn't have happened in the first place, but
22 that's again a matter of poor leadership.

1 Q Just so I understand, I think we may
2 be talking past each other.

3 I understand that your view is that
4 issues of discrimination can result from poor
5 leadership.

6 A Yes.

7 Q Correct?

8 A Correct.

9 Q Okay. And but the Penti- -- some at
10 the Pentagon, perhaps some that you disagree with,
11 have stated the view that discrimination can result
12 from a lack of racial and ethnic diversity in the
13 Officer Corps?

14 A No.

15 MR. CONNOLLY: Objection, form.

16 BY MR. ROBINSON:

17 Q You've never seen that before.

18 A No.

19 Q Okay. So what statements in this
20 brief did you say that you had seen before at the
21 Pentagon?

22 A The -- the ratio or -- or the

1 percentages of white and nonwhite enlisted at the
2 Corps and then comparing it to the percentages in
3 the Officer Corps and them saying that we have to
4 bring those together.

5 Q Understood. You've heard that at the
6 Pentagon before?

7 A Oh, yes.

8 MR. CONNOLLY: Objection, form.

9 THE WITNESS: Yes.

10 BY MR. ROBINSON:

11 Q Okay. And you disagree with that
12 goal, correct?

13 MR. CONNOLLY: Objection, form.

14 THE WITNESS: Again, with that --

15 MR. CONNOLLY: Objection, asked and
16 answered.

17 THE WITNESS: Yeah. With that goal,
18 if that's -- if that's what the senior leadership
19 wants, fine, but I -- I don't see that it is going
20 to positively affect war-fighting capability.

21 BY MR. ROBINSON:

22 Q Just to be clear, you disagree with

1 that judgment that the Officer Corps should better
2 resemble the population in terms of racial and
3 ethnic diversity.

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: I just don't agree with
6 it. But so I guess you can say I disagree.

7 BY MR. ROBINSON:

8 Q Going to ask you some questions about
9 the document, but before I do I think it might be
10 helpful for both of us if I provide you DoD's
11 definition of diversity.

12 So I'll mark this as Exhibit 9.

13 A Okay.

14 (Deposition Exhibit 9 marked)

15 BY MR. ROBINSON:

16 Q And just so you know, the only portion
17 of this document that I'll be referring you to is
18 page 23 that provides the definition of diversity.

19 A Got it.

20 Q So you see that there?

21 A I do.

22 Q I'll just read it.

1 MR. CONNOLLY: One second. Do you
2 need any time to review this document?

3 THE WITNESS: I've seen --
4 I -- I -- I -- I've seen these definitions. I know
5 these definitions.

6 MR. CONNOLLY: Okay.

7 BY MR. ROBINSON:

8 Q So this definition says that
9 "Diversity is all the different characteristics and
10 attributes of individuals from varying demographics
11 that are consistent with the DoD's core values,
12 integral to overall readiness and mission
13 accomplishment, and reflection of the nation we
14 serve."

15 Did I read that correctly?

16 A Yes.

17 Q You've seen this definition before.

18 A Yes.

19 Q And is it your understanding that this
20 definition of diversity includes racial and ethnic
21 diversity?

22 A One can assume that by -- by saying

1 what do they mean by demographics. So that's -- so
2 that's an assumption.

3 Q Is it your understanding that this
4 definition of diversity includes racial and ethnic
5 diversity?

6 A From the meetings that I've been in,
7 then yes.

8 Q So now I'll turn your attention to
9 page 5 of the brief, which is now Exhibit 8.

10 A Yes, got it. Page 5.

11 Q Do you see the first argument heading
12 there says: "Developing a diverse Officer Corps is
13 imperative to confronting discrimination and
14 ensuring equal opportunity in today's military."

15 Using the Department of Defense's
16 definition of diversity, do you agree with that
17 statement?

18 MR. CONNOLLY: Objection, form.
19 Objection, vague.

20 THE WITNESS: I disagree with
21 "imperative." I think it could help, but you can
22 bring in black people who are bad leaders, too,

1 so...

2 BY MR. ROBINSON:

3 Q Why do you think it can help?

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: Maybe -- maybe some of
6 the -- with what they are trying to accomplish in
7 this particular document and the arguments that they
8 are making, maybe a black officer might not treat a
9 black enlistee in the same way. Maybe. But I've
10 seen A-hole black officers, too, so -- so -- so
11 in -- in the mind that people are assuming that,
12 okay, because he's black he's going to let him off
13 or not be as harsh, and I go maybe, maybe not.

14 BY MR. ROBINSON:

15 Q Okay. So just so I understand,
16 separate from what this group is arguing here, you
17 think that having a black officer, example you gave,
18 in the Air Force, for example, could potentially be
19 helpful in terms of how that officer treats,
20 interacts with, black enlisted members.

21 A Yes.

22 MR. CONNOLLY: Objection, form.

1 BY MR. ROBINSON:

2 Q That was a yes.

3 A Yes.

4 Q Could you turn to page 11 of this
5 document, please.

6 Turn your attention to the first full
7 paragraph.

8 A Gotcha.

9 Q "Research shows that effective
10 mentorship of people of color requires an intimate
11 understanding of the challenges race can play in a
12 protege's career progression."

13 Do you agree with that statement?

14 MR. CONNOLLY: Objection, form.

15 Objection, vague.

16 THE WITNESS: Let me look and see if
17 they said -- yes, they said "require." So I
18 absolutely disagree.

19 BY MR. ROBINSON:

20 Q Can you turn to page 14. First full
21 paragraph: "In a 2013 Pentagon survey, 39 percent
22 of service members of color reported experiences of

1 discrimination prohibited by military policy, and 30
2 percent said they considered leaving the military."

3 Does that surprise you?

4 MR. CONNOLLY: Objection, form.

5 Objection, Vague.

6 THE WITNESS: That is surprising.

7 BY MR. ROBINSON:

8 Q Why is it surprising to you?

9 A Because perhaps I've been the --
10 amongst the lucky ones to always be in units with
11 good leadership. And so -- so I don't see that.

12 Q Does it concern you?

13 MR. CONNOLLY: Objection, form.

14 Objection, vague.

15 THE WITNESS: My --

16 MR. CONNOLLY: Objection, lack of
17 foundation.

18 THE WITNESS: My concern would be why
19 are they thinking this? Is it bad leadership? Is
20 it that somebody is particularly strict and they
21 perceive it as racism or what? Because I've
22 seen -- I've seen all of that.

1 BY MR. ROBINSON:

2 Q Going back to page 11, you said that
3 you disagree with this statement --

4 A Uh-huh.

5 Q -- that "Research shows that effective
6 mentor ship of people of color requires an intimate
7 understanding of the challenges race can play in a
8 protege's career progression."

9 You said you disagree. Do you
10 disagree that the research shows that, or do you
11 disagree that effective mentorship requires an
12 understanding of race?

13 MR. CONNOLLY: Objection, form.

14 THE WITNESS: Okay. So I'll clarify.

15 I've seen research and in various
16 topics where people conclude at the end of that
17 research something and other people conclude
18 something different. So maybe there in their
19 statement which it came from race matters, maybe
20 that's what he concluded in his research. So I'm --
21 so I'm not arguing with what he -- what he thinks
22 from his research. I'd have to read his research

1 and -- and then see what I think of then.

2 BY MR. ROBINSON:

3 Q Okay. So just so I understand, let's
4 break it up.

5 A Uh-huh.

6 Q So first question: Do you disagree
7 that the research shows that effective mentorship
8 can require an understanding of the challenges race
9 can play in a person's career?

10 MR. CONNOLLY: Objection, form.

11 THE WITNESS: So I cannot agree or
12 disagree with what that author came up with until I
13 read his -- his book or -- or whatever it is that he
14 wrote, okay?

15 All -- but I'm saying that the --
16 the -- the statement that it requires an intimate
17 understanding of the challenges race can play in a
18 protege career progression is utter bunk, because
19 none of my mentors were black.

20 BY MR. ROBINSON:

21 Q I understand. So you haven't
22 conducted a survey of the research on this issue.

1 A No.

2 MR. CONNOLLY: Objection, form.

3 BY MR. ROBINSON:

4 Q And your opinion that this statement
5 is untrue is based on your personal experiences.

6 A Correct.

7 Q Okay. Could we turn to page 14 again.

8 I'm going to read a passage beginning
9 on the bottom of page 14. It goes on to page 15
10 about Retired Colonel Dr. Annette Tucker Osborne.
11 It says --

12 A Say one -- page one more time.

13 Q 14.

14 A 14.

15 Q Bottom of 14.

16 A Yes.

17 Q "When Retired Colonel Dr. Annette
18 Tucker Osborne entered basic training in 1984, she
19 recalls being told 'you are not different,' which as
20 a woman was actually refreshing to hear because it
21 was the opposite of degrading. We are equals in
22 that camp. As important as these experiences were,

1 Dr. Tucker Osborne also came to understand that
2 prejudice does exist in the military."

3 Okay. I'm going to skip a few
4 sentences.

5 A That she -- look, she's Army, right?
6 Or is she -- it doesn't really say. But
7 nevertheless, it doesn't matter.

8 Q I'm just going to skip a few sentences
9 down the page.

10 A Uh-huh.

11 Q And then it says: "For the six months
12 of her tour, Dr. Tucker Osborne was the only
13 African-American woman colonel on the base."

14 A "Soldier," so Army. Got it.

15 Q "Young white soldiers wouldn't salute
16 her. 'I cannot tell you how many times I would have
17 to stop soldiers reminding them of my rank,' she
18 recalls. It became exhausting."

19 You have no reason to doubt that
20 account, correct?

21 MR. CONNOLLY: Objection, form.

22 Objection, vague. Objection, lack of foundation.

1 THE WITNESS: I wasn't there, so if
2 she says it, I -- I will assume that she's telling
3 what happened.

4 BY MR. ROBINSON:

5 Q Does it surprise you that that --
6 something like that could happen?

7 MR. CONNOLLY: Objection, form.
8 Objection, vague.

9 THE WITNESS: So she -- she came in in
10 1984 right out at basic training, so we can assume
11 this is about 20 years later. So, yeah, I would --
12 so I'd be -- so it's maybe 2004 to 2010 if she's
13 chief nurse in a medical brigade and a colonel '06,
14 so that would surprise me because --

15 So someone like me, not only would
16 those soldiers or airmen or sailors be standing at
17 attention, but then I'd be saying, "Let's -- let's
18 go visit the base commander." And -- and I would
19 make it so that their life was utter hell and no one
20 would ever do it again. But it all depends on how
21 you react to these things.

22 BY MR. ROBINSON:

1 Q You never witnessed anything like this
2 in your experience in the Air Force?

3 MR. CONNOLLY: Objection, form.
4 Objection, vague.

5 THE WITNESS: What I have seen had
6 nothing to do with race. It's young airmen of all
7 races sometimes want to avoid saluting so they'll --
8 they'll kind of pretend they don't see you. And
9 even then, it doesn't matter what they look like,
10 they need to be corrected on the spot.

11 BY MR. ROBINSON:

12 Q Can you just say a little bit more
13 about -- about that, about what you observed?

14 MR. CONNOLLY: Objection, form.
15 Objection, vague.

16 THE WITNESS: Sometimes -- let's go --
17 let's say going through the parking lot of the
18 Pentagon people pretend because they just don't --
19 don't want to salute and sometimes you have to --
20 and it could be white person, it could be black
21 person. And again, it's a matter of military
22 laziness and -- and not adhering to the military

1 customs and courtesies. And there's some people who
2 blow it off and there's certain people who don't.
3 And those who don't correct it on the spot.

4 BY MR. ROBINSON:

5 Q But you said this was surprising to
6 you. And is that because you have not experienced
7 this kind of discrimination in your career?

8 MR. CONNOLLY: Objection, form.

9 THE WITNESS: I -- I would be -- I'm
10 surprised because she says "I cannot tell you how
11 many times," which -- which means it's happening
12 over and over again. And I -- I'm wondering why she
13 didn't take the appropriate measures to cut -- to
14 stop that crap out totally. And so that -- that's
15 what really surprises me.

16 BY MR. ROBINSON:

17 Q Okay. It's possible that she did take
18 those measures, right?

19 MR. CONNOLLY: Objection, form.
20 Objection, lack of foundation.

21 THE WITNESS: It's always a
22 possibility.

1 BY MR. ROBINSON:

2 Q Okay. And you haven't had this
3 experience, but it's fair to say that other black
4 service members in the Air Force and other services
5 may have had experiences like this, right?

6 MR. CONNOLLY: Objection, form.

7 Objection, vague.

8 THE WITNESS: That -- that's a lot of
9 speculation there, but -- but anything is
10 possible.

11 BY MR. ROBINSON:

12 Q Well, I won't bring them out again,
13 but we looked at those survey results earlier today,
14 right?

15 A Yes.

16 Q And if I recall correctly -- correct
17 me if your recollection is different -- something
18 like 40 percent of African-American service members
19 said that they had experienced discrimination,
20 correct?

21 MR. CONNOLLY: Objection, form.

22 THE WITNESS: Whatever it said there,

1 it said that. But here we're talking about white
2 soldiers refusing to salute, and -- and that's a
3 very specific thing. And that is something that --
4 now -- now in that other survey that you told me, it
5 didn't say whether it was overt or subtle or what.
6 It just -- it just said they'd experienced
7 discrimination.

8 Something like this is pretty -- if --
9 if it was only white soldiers doing it, then
10 something like this would be pretty startling in
11 today's -- in today's military. And swift action
12 be -- should come down from the top on it.

13 BY MR. ROBINSON:

14 Q Turn to the next paragraph. This
15 recounts the experience of Retired Commander Flight
16 Medicine Stephanie Davis.

17 A Uh-huh.

18 Q And I'll just read this again.

19 "Stephanie Davis, who retired as a commander of
20 flight medicine recounted similar experiences over
21 the course of her career. During residency, white
22 colleagues gave her the call sign ofAWB' [sic] for

1 angry black woman insisting it was a joke.
2 Subordinates refused to salute her and patients
3 refused to call her by her proper rank. Davis
4 recalled that after being taught to believe that the
5 military is the one place where everybody has a
6 level playing field, initial experiences of racism
7 and discrimination can leave people feeling
8 blindsided."

9 Does that vignette surprise you?

10 MR. CONNOLLY: Objection, form.

11 Objection, vague. Objection, lack of foundation.

12 Objection, hearsay.

13 THE WITNESS: I would be surprised
14 if -- and so for -- especially for context, when --
15 what timeframe did this happen? Because I was
16 trying to look in on the ~~56~~ there, and it doesn't
17 really say what decade this is in.

18 BY MR. ROBINSON:

19 Q Yeah, I -- I --

20 A Now, if that was happening in the '60s
21 or even the '70s, not surprising. Today I'd be
22 flabbergasted that, especially what she's saying,

1 subordinates refused to salute her. And so I'd say,
2 "Oh, really, okay." And so I'd be really surprised.

3 Q Okay. Turn to page 17, please.

4 First full paragraph. "When officers
5 in leadership are not adequately attentive to
6 discrimination, service members do not have an
7 external source of recourse."

8 Do you agree with that statement?

9 MR. CONNOLLY: Objection, form.

10 Objection, vague.

11 THE WITNESS: I would agree to that.

12 BY MR. ROBINSON:

13 Q Okay. A few times today we have
14 talked about statements by senior military leaders
15 about the value of racial and ethnic diversity. And
16 at times I believe you said that you thought that
17 their statements were political or doing what the
18 Department of Defense wanted them to do or say.

19 Is it your view that every senior
20 military officer that's spoken about the importance
21 of racial and ethnic diversity is just being
22 political when they speak on that issue?

1 MR. CONNOLLY: Objection, form.

2 Objection, vague.

3 THE WITNESS: No.

4 BY MR. ROBINSON:

5 Q What -- go ahead, explain.

6 A The ones who are not being political I
7 think are just in their mind they think that it's
8 that way because in their mind black people, the
9 whole Mullen ducks -- ducks thing, that went around
10 the Pentagon, and I looked at it much differently
11 than other people. I said, "No, so what you're
12 trying to say is -- what you're trying to imply is
13 white people look at black people as a different
14 species. Ducks pick ducks, humans pick humans." And
15 so again, that implication is sort of insulting.
16 And so again, in some of these cases the people who
17 say this **believe** in their head that, oh, yeah, black
18 people are going to take care of black people
19 better. I go, "Where do you even get that from?"
20 But again, it's just something that -- that they
21 have a feeling about, but they -- but they -- but
22 they're not really examining it down to the **Corps.**

1 Q So your testimony is you believe that
2 some of those military leaders genuinely believe
3 that racial and ethnic diversity is important to the
4 effectiveness of the military.

5 MR. CONNOLLY: Objection, form.

6 THE WITNESS: I think some of them are
7 true believers.

8 BY MR. ROBINSON:

9 Q But you believe that that opinion is
10 flawed, correct?

11 A Correct.

12 Q And that's based on your personal
13 experiences, correct?

14 MR. CONNOLLY: Objection, form.

15 THE WITNESS: Correct.

16 BY MR. ROBINSON:

17 Q They could have had different personal
18 experiences that you didn't have that could be
19 driving their opinions, correct?

20 MR. CONNOLLY: Objection, form.

21 Objection, speculative.

22 THE WITNESS: Yeah, they -- they

1 could.

2 BY MR. ROBINSON:

3 Q You don't know what those experiences
4 were that formed that judgment that they arrived at,
5 right?

6 MR. CONNOLLY: Objection, form.

7 Objection, vague.

8 THE WITNESS: I cannot know anyone's
9 reason for coming up with these -- with these
10 opinions that they have.

11 BY MR. ROBINSON:

12 Q If we can turn back to Exhibit 1, this
13 is your expert report.

14 A Uh-huh. Oh, got it.

15 Q Direct your attention to page 21.

16 Go to the very bottom of the page.

17 You say: "I know firsthand that there are many
18 general officers inside and outside the Pentagon,
19 including those still in active service, who
20 disagree." And then I will paraphrase, but let me
21 know if paraphrase is not accurate, that a diverse
22 Officer Corps is important for military readiness.

1 Is that fair?

2 MR. CONNOLLY: Objection, form.

3 Objection, mis -- misreads the report.

4 THE WITNESS: I would say I agree with
5 my statement that -- that the -- they disagree with
6 the racial reductionism that underlies the DoD's
7 assertions. And -- and the primary thing that the
8 DoD in my experience, that the Pentagon has been
9 going after immutable characteristics.

10 BY MR. ROBINSON:

11 Q Okay. So we'll go with your
12 statement.

13 A Uh-huh.

14 Q Who do you know at the Pentagon who
15 disagrees with -- with this statement?

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: You're asking me to give
18 people's names?

19 MR. CONNOLLY: One second. Can we go
20 ~~for~~ the record for a second?

21 MR. ROBINSON: It's fine.

22 (Off the record)

1 BY MR. ROBINSON:

2 Q Okay. Welcome back, General.

3 A Many thanks.

4 Q Going to ask you some questions about
5 page 22 of your expert report.

6 A Uh-huh.

7 Q On this page you suggest to the
8 general officers who support diversity and inclusion
9 are following directives and subordinating their
10 will to that to the institution even when they
11 disagree; is that correct?

12 A Correct.

13 Q And you say at the bottom of the
14 second -- of the first full paragraph: "I know this
15 because until last year I was one of them even while
16 assigned to multiple diversity and inclusion
17 departments within the Pentagon," correct?

18 A Correct.

19 Q Okay. So what positions or policies
20 at the Pentagon did you remain silent about even
21 though you disagreed with them?

22 MR. CONNOLLY: Objection, form.

1 THE WITNESS: Okay. Well, one, I --
2 when they would -- when they would start saying,
3 okay, we need to get this number of blacks and
4 women, I would say "uh," and but the reason they're
5 saying it is because they -- they wanted to find
6 measures that are beyond merit to increase. And so
7 I -- and that's where I disagree.

8 If they -- in my opinion, and I was
9 vocal about this that I'm about to say. I said,
10 "Hey, we need to widen the net and we need to go out
11 and find the best and brightest from all
12 neighborhoods and this will happen naturally." And
13 so but -- but after a while I just said, okay,
14 whatever.

15 BY MR. ROBINSON:

16 Q What other -- are there any other
17 policies that are positions that you were asked to
18 take that you disagreed with while you were working
19 at the Pentagon?

20 MR. CONNOLLY: Objection, form.

21 THE WITNESS: The pronoun issue. And
22 at first I objected but then I just -- I just

1 stopped because they were going in a certain
2 direction and -- but in the end they didn't go as
3 hard as -- as they were heading in the beginning.
4 And the end -- the end result was fairly benign,
5 allowing service -- allowing Air Force members on
6 the signature blocks in their emails to put their
7 pronouns. And I said, "eh, okay," and so -- but --
8 but they were heading down the direction of, hey,
9 punish any service member who doesn't use proper
10 pronouns. And I said, "Oof, that's not going to
11 work."

12 BY MR. ROBINSON:

13 Q Were there any other policies or
14 positions that you disagreed with while you were at
15 the Pentagon?

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: Mainly just desired
18 numbers and -- and sort of radical things. Okay,
19 yes, there was another one. Discussion on drag
20 shows on military bases, and I -- I made my initial
21 objection clear, but I saw where it was going. But
22 eventually they -- they -- they backed down on their

1 own.

2 BY MR. ROBINSON:

3 Q Okay. So notwithstanding your
4 disagreement with these policies, you continued to
5 work at the Pentagon, correct?

6 A Correct.

7 Q You continued to work in the diversity
8 and inclusion office.

9 A Correct.

10 Q You did not resign.

11 A I did not.

12 Q Earlier we talked about General
13 Fogleman, I think. We talked about Milley. And you
14 said that if they disagreed they should resign, and
15 in General Fogleman's case they did, right?

16 MR. CONNOLLY: Objection. Objection,
17 form.

18 THE WITNESS: Yes, and so that is a
19 sort of broad vague sense of what I was saying. In
20 Milley's case, when he knew that it would cost lives
21 that didn't need to be cost, and it would -- and it
22 would turn into a -- a major, major snafu, he should

1 have said that, okay? That is operational. That is
2 the lives of our service members.

3 And then afterwards he goes media and
4 says, "Yeah, I -- I disagree. I told them it -- it
5 would be bad" and -- and so he -- and so that's
6 something I feel one should fall on one's sword
7 for.

8 BY MR. ROBINSON:

9 Q Well, when the Pentagon was asking you
10 to work on these initiatives that you didn't agree
11 with, why did you continue to work on them as
12 opposed to resign?

13 A No, so -- so --

14 MR. CONNOLLY: Sorry, one second.
15 Objection, form.

16 THE WITNESS: So you're asking me
17 things that I was tasked to work on. So those
18 things I -- I was not a decision maker, one. I'm an
19 advisor. And so -- and so secondly because as an
20 advisor I -- I give my opinion and say "This is how
21 it can go, this is how it probably will go." And
22 thus, if -- if I had left they'd put in somebody who

1 wouldn't make any -- any objections at all.

2 BY MR. ROBINSON:

3 Q One of your opinions in this case is
4 that the Naval Academy's consideration of race in
5 the admissions process is counterproductive,
6 correct?

7 MR. CONNOLLY: Objection, form.

8 THE WITNESS: Say the question one
9 more time.

10 BY MR. ROBINSON:

11 Q Is one of your opinions in this case
12 that the Naval Academy's consideration of race in
13 the adminis- -- in the admissions process is
14 counterproductive?

15 A Yes.

16 MR. CONNOLLY: Objection, form.

17 BY MR. ROBINSON:

18 Q You believe it's unconstitutional.

19 MR. CONNOLLY: Objection, form.

20 Objection to the extent you're asking the witness
21 for a legal conclusion.

22 BY MR. ROBINSON:

1 Q You can answer if you have a view.

2 A Okay. I view it as unconstitutional.

3 Q You believe it is unlawful racial
4 discrimination.

5 MR. CONNOLLY: Objection, form.
6 Objection to the extent you're asking the witness
7 for a legal conclusion.

8 THE WITNESS: In my opinion, my
9 nonlegal opinion, I believe that it -- it goes
10 counter to the constitution.

11 BY MR. ROBINSON:

12 Q And were you aware of the nature --

13 A And the Civil Rights Act of 1964.

14 Q And were you aware of the Naval
15 Academy's consideration of race in the admissions
16 process when you were working at the Pentagon?

17 MR. CONNOLLY: Objection, form.

18 THE WITNESS: I really didn't delve
19 into what the Naval Academy was doing. I was -- I
20 was -- I was busy enough with what the Air Force
21 Academy has brought.

22 BY MR. ROBINSON:

1 Q Were you aware generally what the
2 general academies considered race in the admissions
3 process?

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: I assumed so.

6 BY MR. ROBINSON:

7 Q But you never raised concerns about
8 that while you were at the Pentagon.

9 MR. CONNOLLY: Objection, form.

10 THE WITNESS: For Air Force Academy I
11 said that's not the way to do it, because what's
12 going to end up happening is if you're trying to
13 force the numbers with people who, first of
14 all -- I'll start by saying the military is not for
15 everybody. But if you're just trying to get faces
16 you're going to end up with a bad situation. If you
17 really want that, you've got to, again, put in the
18 work and start earlier and make sure that their K
19 through 12 education and their -- and put out there
20 programs where they can be involved in that will
21 make them enthusiastic and -- and educated enough to
22 make it through the rigorous Air Force Academy

1 program.

2 BY MR. ROBINSON:

3 Q And when you raised those
4 objections -- first of all, who did you raise those
5 objections to at the Pentagon?

6 MR. CONNOLLY: Objection, vague.

7 THE WITNESS: Just -- just about
8 anybody who would listen.

9 BY MR. ROBINSON:

10 Q Okay.

11 A I -- I didn't really get direct access
12 to the Chief of Staff of the Air Force or the
13 Secretary. And by the time things were being
14 briefed to them, as a 1-star in there, unless they
15 turned and asked me a question, I don't -- I don't
16 get to interrupt and say something.

17 Q So you were not yourself a decision
18 maker at the Pentagon.

19 A No.

20 Q And --

21 A Not in that capacity, no.

22 Q In what capacity were you a decision

1 maker?

2 A Certain projects while I worked with
3 SAF/MR.

4 Q When was that again?

5 A That was 2018 through 2020.

6 Q Okay.

7 A So summer of 2018 through the summer
8 of 2020, I believe, yeah.

9 Q Okay. But in your role as senior
10 military advisor to the Secretary of the Air Force's
11 Office of Diversity and Inclusion, you were not the
12 policy maker.

13 MR. CONNOLLY: Objection, form.

14 THE WITNESS: It's all in the title,
15 "senior advisor."

16 BY MR. ROBINSON:

17 Q Remind me the name of your direct
18 supervisor in that role.

19 A Marianne Malizia.

20 Q And did you raise your concerns about
21 the Air Force's consideration of race in the
22 admissions process to her?

1 MR. CONNOLLY: Objection, form. Or
2 ob- -- yeah, objection, form.

3 THE WITNESS: Yes.

4 BY MR. ROBINSON:

5 Q Okay. And what did she tell you?

6 A She -- she disagreed with me, but,
7 again, it's a -- it's a conversation. It's -- it's
8 not an argument.

9 Q Okay. When she told you that the Air
10 Force was going to continue to consider race in the
11 admissions process, you didn't resign, right?

12 MR. CONNOLLY: Objection, form.

13 THE WITNESS: I did my job in giving
14 my best advice.

15 BY MR. ROBINSON:

16 Q You were following the chain of
17 command at the military, right?

18 MR. CONNOLLY: Objection, form.

19 THE WITNESS: And so my -- me giving
20 advice to her, I don't get to override her and then
21 go to the secretary and say, "Hey, I disagree with
22 what she said." I -- I -- I don't get to do that.

1 BY MR. ROBINSON:

2 Q Did it ever occur to you while you
3 were working on these issues at the Pentagon that I
4 just, you know, disagree with so much about what
5 this office is doing that I think it would be more
6 appropriate for me to step aside?

7 MR. CONNOLLY: Objection, form.

8 THE WITNESS: I actually thought about
9 it, but I said, "If I'm gone, is anybody they bring
10 in afterwards going to raise any objection at all.
11 So I better be here to be the one to least be the
12 Cassandra in the room.

13 BY MR. ROBINSON:

14 Q I'd like to ask you some questions
15 about your opinions regarding unit cohesion. If you
16 could turn to page 24 of your report.

17 General Walker, is it your opinion
18 that racial and ethnic diversity are irrelevant to
19 unit cohesion?

20 MR. CONNOLLY: Objection, form.

21 THE WITNESS: That is my opinion.

22 BY MR. ROBINSON:

1 Q What is the basis of that opinion?

2 A The basis of that opinion is not only
3 my experiences but watching other units as well.
4 When a unit is operating at top level, it's because
5 of the training and leadership. And I've seen units
6 that have very -- very few, if any, black senior
7 leaders and some who -- who have senior black
8 leaders. But -- but the -- the common thread in
9 achieving top level performance was realistic
10 training and good -- and great leadership. Not just
11 good leadership.

12 Q Aside from your own experiences and
13 observing other units, as you said, is there any
14 other basis for your opinion that racial and ethnic
15 diversity are irrelevant to unit cohesion?

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: Those are -- those are
18 my reasons.

19 BY MR. ROBINSON:

20 Q You have not done any studies yourself
21 on this issue, correct?

22 A Correct.

1 Q You have not authored any publications
2 on this issue, correct?

3 A Correct.

4 Q You're not a sociologist?

5 A I am not.

6 Q You're not a political scientist?

7 A I am not.

8 Q Turning to page 24. You're already
9 there.

10 A Uh-huh.

11 Q You say -- this is in bold italics:
12 "Service members are primarily concerned about the
13 competence of those around them rather than race or
14 ethnicity." And this is consistent with what you
15 were just saying.

16 Do you think that some service members
17 care about the racial and ethnic diversity of the
18 Officer Corps?

19 A I believe that fresh new recruits
20 might, but once they -- once they are fully trained
21 and either in combat or in realistic training, it
22 quickly turns to, all right, who is -- who is going

1 to keep me alive and who is not going to keep me
2 alive.

3 Q And why do you think fresh recruits
4 might care about the racial and ethnic diversity of
5 the Officer Corps?

6 A Some of them may be attracted to -- to
7 seeing someone who looks like them. And but I liken
8 it to attraction in a bar, a guy and a girl,
9 guy-guy, whoever. But two people who have that
10 initial look. But then when they start talking,
11 either it goes well or they part ways. ~~But so~~ it's
12 the same thing in -- in the military.

13 Q And when you say that service members
14 are, quote, "primarily concerned about the
15 competence of those around them rather than race or
16 ethnicity," you of course can't know what's going on
17 inside the head of any particular service member,
18 right?

19 A That is correct.

20 Q It's possible that there are service
21 members out there for whom it's more important or
22 less important, correct?

1 MR. CONNOLLY: Objection, form.

2 THE WITNESS: It's -- it's possible.

3 BY MR. ROBINSON:

4 Q You haven't surveyed service members
5 on this issue, correct?

6 A Correct.

7 MR. CONNOLLY: Objection, form.

8 BY MR. ROBINSON:

9 Q And you talk in your report about
10 bonding with your fellow soldiers and airmen based
11 on your experience regardless of race. I think
12 there's an example on page 4. You can turn to it if
13 you would like to.

14 You say that you start it off with
15 four black officers. "We ended with two. One other
16 black officer and me. The other two chose to only
17 associate with other black officers regardless of
18 those officers' talent and commitment," right?

19 A Correct.

20 Q For some service members, do you think
21 that race can play a role in bonding with their
22 fellow soldiers?

1 MR. CONNOLLY: Objection, form.

2 THE WITNESS: In -- let's talk about
3 this case in particular. They -- they -- they
4 wanted to bond with the people who would go out
5 partying in the same places they wanted to go
6 partying, which turned out being other black
7 officers.

8 BY MR. ROBINSON:

9 Q Okay.

10 A But they timed the studies. One of
11 those individuals who didn't make it through was
12 actually my roommate during navigater training, and
13 I kept saying, "Dude, you need to -- you need to
14 step it up. Get with the studies. Stop going out
15 every night."

16 Q But just turn -- turn back to my
17 question. Do you think that race can play a role
18 for some service members to help them bond?

19 MR. CONNOLLY: Objection, form.
20 Objection, calls for speculation.

21 THE WITNESS: That calls for
22 speculation, but -- but I'll say this: It's

1 possible. It's possible for not just service
2 members but people in general, you know, so but --

3 But again, the bond, bonding as a --
4 as a unit or bonding for partying? So -- so which
5 one are you talking about?

6 BY MR. ROBINSON:

7 Q Well --

8 A I mean, bonding as a -- to help them
9 bond as a -- as a well-functioning unit? I don't
10 think so.

11 Q Well, I want to start with the
12 speculation point. You're an expert witness in this
13 case.

14 A Yes.

15 Q You were a General in the United
16 States Air Force.

17 A Correct.

18 Q You led units of young men and women.

19 A Yes.

20 Q You could have led them into battle if
21 there were.

22 A There were some.

1 Q You did lead them in battle.

2 A Yeah.

3 Q So this isn't an issue of speculation
4 for you, right?

5 A Correct.

6 Q You worked with these people. And my
7 question is: Do you think that for some of those
8 people you led race could have played a role in
9 helping them to bond with their fellow service
10 members?

11 MR. CONNOLLY: Objection, form.

12 THE WITNESS: At that point of their
13 level of training and the things we were going to,
14 no.

15 BY MR. ROBINSON:

16 Q You thought it was irrelevant to
17 bonding for purposes of -- of unit cohesion.

18 MR. CONNOLLY: Objection, form.
19 Objection, asked and answered.

20 THE WITNESS: So irrelevant, yes.

21 BY MR. ROBINSON:

22 Q And you think you can say that to

1 every -- for every service member that you led.

2 MR. CONNOLLY: Objection, form.

3 Objection --

4 THE WITNESS: The ones that I led?

5 Yes, because most cases the people I were leading

6 were mostly white. And they would all follow me,

7 and they'll tell you to this day that they'll follow

8 me to the end of the earth.

9 BY MR. ROBINSON:

10 Q If I could direct your attention to
11 page 30 of your expert report. We're still talking
12 about unit cohesion.

13 A Uh-huh.

14 Q You say here: "USNA similarly claims
15 that racially diverse officers are better able to
16 lead racially diverse troops."

17 So I'd like you to assume for the
18 purposes of this question that that is not our
19 argument. And assume for the purposes of this
20 question that our position is that a diverse Officer
21 Corps as a group is better able to lead a racially
22 diverse enlisted Corps.

1 Assuming that that's our position, do
2 you agree with that position?

3 A No.

4 MR. CONNOLLY: Objection. Objection,
5 form. Sorry.

6 BY MR. ROBINSON:

7 Q Why not?

8 A Because it is not based on the way
9 people look. It's based on the way -- on the way
10 they perform.

11 Q Turning to page 31. You say: "There
12 is no evidence to suggest that racially balanced
13 units are more effective at their missions, and my
14 experience suggests this is not the case."

15 What have you done to study this
16 issue?

17 MR. CONNOLLY: Objection, form.
18 Objection, vague.

19 THE WITNESS: As it say -- as it says
20 for just the evidence part, I've asked for -- I
21 think my lawyers have probably asked for it,
22 everybody has asked for it and no one has come up

1 with it. So if it were there, it wouldn't be
2 secret. So that's -- that's my basis for that first
3 part of the sentence.

4 The -- then my experience suggests
5 it's not the case based on my experience.

6 BY MR. ROBINSON:

7 Q Are you aware of any data showing that
8 racially homogenous units are more effective at
9 their mission?

10 A No. Because again, race is
11 irrelevant. It's leadership and training.

12 Q Also on page 31 -- this is the second
13 sentence after the section heading.

14 A Uh-huh.

15 Q You say: "I have never seen any data
16 that supports this conclusion, nor have I ever heard
17 of any unit attempting to leverage this so-called
18 advantage in an operational setting."

19 Are you familiar with how the Navy
20 organizes promotion boards?

21 A No. As a matter of fact, it was only
22 in the last two years where I was able to penetrate

1 the secret vault of how Air Force performs their
2 promotion boards.

3 Q And when you penetrated that vault,
4 what did you find?

5 A I found that -- especially when it
6 came to promotions at O-6 and above, I -- I found
7 that major command, MAJCOM commanders -- well,
8 actually, they are -- they are MAJCOM deputy
9 commanders, had in my opinion a little too much
10 power in -- in the process.

11 Q Did you learn anything about whether
12 Air Force tries to get a cross section of race,
13 gender, geography, when they organize promotion
14 boards?

15 MR. CONNOLLY: Objection, form.

16 THE WITNESS: Are you asking whether
17 the Air Force says, okay, let's make sure that we
18 have a certain number of different demographics? Is
19 that what you're asking?

20 BY MR. ROBINSON:

21 Q In -- in composing the promotion board
22 itself --

1 A Yes.

2 Q -- do you know whether the Air Force
3 strives to have a cross section of race, gender,
4 geography, et cetera?

5 A Yes.

6 Q They do.

7 A They do.

8 Q Okay. So that would be an example of
9 the military trying to leverage racial and ethnic
10 diversity in an operational setting, correct?

11 MR. CONNOLLY: Objection, form.

12 THE WITNESS: That's not an
13 operational setting.

14 BY MR. ROBINSON:

15 Q Okay. But promotion boards are very
16 important, right?

17 MR. CONNOLLY: Objection, form.

18 THE WITNESS: They are -- they are
19 important, but then you're saying they're trying to
20 leverage it. What have been the results? Have we
21 gotten more minority promotions? I don't know.

22 So again, I would have to see if

1 you're asking me to use that example you're going to
2 have to also give me what the results of those
3 promotion boards, and did it affect the
4 proportions.

5 BY MR. ROBINSON:

6 Q And you said you don't know what the
7 Navy does.

8 A I do not. I suspect that they do
9 that, but I have -- I have no idea.

10 Okay. So I will... It's not a unit.
11 It was the U.S. Army, or the Marines, but they were
12 in World War II, did leverage Navajo for that
13 specific mission. So okay, so I am aware of one.

14 Q Thank you. If I could direct your
15 attention to page 36, please.

16 You say: "USNA argues that race is an
17 effective proxy for diversity of viewpoints and
18 backgrounds. In particular, USNA argues that people
19 from different backgrounds, groups, regions and
20 cultures experience security and conflict
21 differently, particularly those for minority or
22 underrepresented groups. They may have a point, but

1 I think race is more likely correlated than causal.

2 So my first question is: What do you
3 mean by they may have a point?

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: What I meant by that
6 statement was I -- I'm sure they'll be able to come
7 up with some examples, like I think it was Jeannette
8 Haney came up with the example about the **Haitian**
9 officer. But in my opinion that was not because of
10 the color of his skin, it's because he actually grew
11 up in Haiti and knows **Creele.** Because if I went
12 down there, I'd be just as lost.

13 Q But you at least agree that people
14 from different backgrounds, groups, regions and
15 cultures, experience security and conflict
16 differently.

17 A Yes.

18 MR. CONNOLLY: Objection, form.

19 THE WITNESS: Yes.

20 BY MR. ROBINSON:

21 Q And you say race is not an effective
22 proxy for viewpoints or life experiences. Do you

1 think race can have some impact on one's per- -- on
2 a person's viewpoints or life experiences?

3 MR. CONNOLLY: Objection, form.
4 Objection, vague.

5 THE WITNESS: Each person is
6 individual. And what I'm saying there is the U.S.
7 Navy and/or the DoD's assertion that black people
8 have a certain viewpoint is not correct.

9 BY MR. ROBINSON:

10 Q I will again ask you to assume for
11 purposes of this question --

12 A Uh-huh.

13 Q -- that is not our position.

14 And my question is just: For those
15 individuals, do you think that for some of them,
16 some of whom you led, race and ethnicity can have
17 some impact on their viewpoints or experiences?

18 MR. CONNOLLY: Objection, form.
19 Objection, vague. Objection, calls for
20 speculation.

21 THE WITNESS: Again, there are almost
22 limitless things that go into people's viewpoints

1 and experiences. So -- so what I hear you saying is
2 that though -- but race is the thing that would --
3 would cause certain viewpoints. And so again, race
4 can be a contributor, but so can what climate they
5 grew up in. Talking about weather. So can their
6 socioeconomic association. So can the region they
7 grew up in. People from Boston, way different from
8 people from Louisiana. So -- so -- so trying to
9 di- -- distill it to race is -- is not the way to do
10 it.

11 BY MR. ROBINSON:

12 Q I understand. And all I'm asking at
13 this point is whether race can be one factor that
14 could affect someone's life experiences and
15 viewpoints.

16 A Yes.

17 MR. CONNOLLY: Objection, form.

18 Objection, vague. Objection, calls for speculation.

19 BY MR. ROBINSON:

20 Q And why do you think that is?

21 MR. CONNOLLY: Objection, form.

22 Objection, vague.

1 THE WITNESS: Because for basic common
2 sense is, again, anything can -- the -- what they --
3 someone got stung by a bee would affect their whole
4 life. Anything can be a contributor to their
5 viewpoint. And so for me to say that their race
6 wasn't is -- is ridiculous. Anything can.

7 BY MR. ROBINSON:

8 Q As a white guy from New Jersey, I'm
9 less likely to have experienced racial prejudice,
10 for example, than a black man from Mississippi,
11 right?

12 MR. CONNOLLY: Objection, form.
13 Objection, lack of foundation.

14 THE WITNESS: It all depends. Which
15 part of are you --

16 BY MR. ROBINSON:

17 Q The shore.

18 A Okay, see, there's a -- if you were in
19 Newark, then black people would be casting
20 aspersions to you. So -- so again, by saying from
21 New Jersey, I've never been to the shore, so I don't
22 know what it's like out there. And someone in

1 Mississippi, and a black person in Mississippi,
2 that's assuming that all of Mississippi is like
3 that. They could have come up in a black
4 neighborhood there and not seen it as well. And so
5 your -- your -- that question is just too vague.

6 Q Well, but it's all -- it's all
7 relevant. It's all part of the mix, isn't it, the
8 fact that I am a white man -- it's nothing about me,
9 but, you know, a white man is less likely to be a
10 victim of -- of racial prejudice than a black man.
11 It's just -- it's just a fact of -- of our society,
12 isn't it?

13 MR. CONNOLLY: Objection, form.
14 Objection, vague. Objection, lack of foundation.

15 THE WITNESS: My answer would be,
16 well, I'm sure the Georgetown instructors would
17 agree with you there, but their -- their assertion
18 is that black people can't be racist. And so -- so
19 you make -- now, if -- if you -- if you specified --
20 if you are less likely to be, you know, people even
21 thinking something racist about you, even then I
22 could go, well, how would we know? There are --

1 there are many times I can walk into a room, and I
2 have no idea what the people are thinking unless
3 they say something. And the same thing goes with
4 you. And so to assume that -- that you are less
5 likely to be racially -- people have racist thoughts
6 about you, I -- I -- again, that -- that just
7 doesn't make sense. Everybody can have racist
8 thoughts.

9 BY MR. ROBINSON:

10 Q Do you think someone who has
11 experienced racial prejudice, that that could affect
12 their thoughts and life experiences?

13 MR. CONNOLLY: Objection, form.
14 Objection, calls for speculation.

15 THE WITNESS: Yes. Again, any --
16 anything can affect people's life experiences.

17 BY MR. ROBINSON:

18 Q You testified earlier that your
19 opinion is that racial and ethnic diversity is
20 irrelevant for unit cohesion. Do you also believe
21 that geographic diversity is irrelevant to unit
22 cohesion?

1 MR. CONNOLLY: Objection, form.

2 THE WITNESS: No.

3 BY MR. ROBINSON:

4 Q Why do you think geographic diversity
5 can be relevant to unit cohesion?

6 A There are some people who grew up in
7 certain climates, ~~may be anywhere~~ from ~~human~~ jungle,
8 are probably going to be better in certain
9 situations around the world in that environment than
10 people who grew up in Vermont or Alaska, okay, and
11 vice versa. People who grew up in Alaska or in
12 northern tier states would probably have an
13 advantage over, if we do arctic warfare, probably
14 have advantage at least initially, ~~people~~ who grew
15 up in Miami, so yes.

16 Q Do you think that geographic diversity
17 can also contribute to diversity of viewpoints and
18 opinions?

19 A Let me -- let me quantify that by
20 saying it could, geographically, somebody from,
21 let's say, New York and somebody from Kansas, okay,
22 someone who is -- who is used to being in ~~n~~ urban

1 environment, okay, than somebody not -- not -- you
2 know, not breaking on Kansas, but someone who is not
3 used to being in an urban environment. And if we're
4 ever in a situation, operation in urban environment,
5 they'd probably have advantages over the people who
6 came up in Midwest farms.

7 Q Okay.

8 A And then vice versa. In a survival
9 situation, which I experienced ~~my several~~, there
10 were people who were quite ready for Siri and
11 others -- like me, coming out of New York City, I
12 was quite unready for it.

13 Q I can imagine. So is that -- that's a
14 yes, that you think geographic diversity can
15 contribute to diversity of thought and viewpoints?

16 A Yes.

17 Q That can lead to better decision
18 making?

19 MR. CONNOLLY: Objection, form.

20 THE WITNESS: So that's -- that's
21 going back to the urban warfare. Somebody who came
22 up in a really urban -- dense urban area and

1 knows -- and knows his or her way around that sort
2 of thing might pick up certain things, say, "Oh,
3 these dudes are following us." They ~~-- they -- they~~
4 might have -- they might have certain instincts that
5 people who weren't in that environment would have.

6 And then counter to that, get someone
7 out of the city whose spent their whole life in the
8 city and everything came to them through the
9 supermarket, if -- if -- if the brown stuff hits the
10 fan and we're -- we're having to find our own food,
11 people who live in the country are going to have a
12 greater advantage.

13 But again, yes, everyone brings those
14 sorts of skills to it.

15 BY MR. ROBINSON:

16 Q I appreciate that illustrative
17 example, but so that's -- that's a yes, it can
18 contribute to better decision making, geographic
19 diversity.

20 MR. CONNOLLY: Objection, form.
21 Objection, asked and answered.

22 THE WITNESS: Yes.

1 BY MR. ROBINSON:

2 Q All right. I'd like to turn to page
3 38 of your report and ask you some questions about
4 your opinions about recruitment and retention.

5 You say here that "Removing race-based
6 accessions will not harm recruiting," correct?

7 A Correct.

8 Q When you refer to race-based
9 accessions here, what are you referring to?

10 A I'm referring to giving a bump up on
11 scores and -- and accepting lower SAT scores based
12 on race.

13 Q What -- in what context? I think I
14 know the answer, but I'll ask you in what context
15 are you talking about?

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: So specifically what I
18 just said, service academy admission.

19 BY MR. ROBINSON:

20 Q Okay.

21 A But I'll also say that if it's not SAT
22 scores, then ASVAB scores as well. And Army --

1 Marines aren't going to do it. But the -- but the
2 Army has put together some programs to at least try
3 to bump up the ASVAB score, and I go, okay, more
4 power to you. At least we're going to get somebody
5 who -- who is more competent in combat. Navy I
6 think is considering it, but...

7 Q So going back to your opinion that
8 removing race-based accessions will not harm
9 recruiting, what methodology did you use to reach
10 that conclusion?

11 A I went to my experience saying, hey,
12 look, if you know how to go out and talk with people
13 and properly inspire them and motivate them, then
14 they will come. Again, I go back to the
15 professional athlete model. NFL, NBA, Major League
16 baseball all do this, and they have a line of people
17 waiting to -- to join them. So...

18 Q So side from that experience you spoke
19 about and the professional athletics model you spoke
20 about, any other basis for this conclusion that
21 removing race-based accessions will not harm
22 recruiting?

1 MR. CONNOLLY: Objection, form.

2 THE WITNESS: My -- my -- that
3 particular statement is sort of a -- is sort of a
4 backup or a support that race-based accessions
5 will -- may -- well, may or will harm the unit
6 cohesion because people will not know whether
7 people -- people brought in were brought in under
8 the same standards they were.

9 And in some cases, especially when
10 known, the people who were brought in in lower
11 standards and realize that they were brought in at
12 lower standards, it's going to -- it's going to
13 affect them mentally as well.

14 BY MR. ROBINSON:

15 Q So I understand your opinion as it
16 relates to unit cohesion.

17 A Uh-huh.

18 Q For this I'm just asking about your
19 opinion that race -- removing race-based accessions
20 will not harm recruiting. And I just want to know
21 if there's any other methodology or basis that --

22 A No.

1 Q -- you relied on.

2 A No.

3 Q And you say in this section that you
4 believe the Naval Academy should recruit from
5 schools like the Success Academy Charter Schools in
6 New York; is that correct?

7 A Correct.

8 Q What is your knowledge of the Naval
9 Academy's recruitment practices?

10 A Very little.

11 Q Do you know whether the Naval Academy
12 recruits from the Success Academy Charter Schools?

13 A I cannot say whether they do. I
14 cannot say whether they concentrate on it. I cannot
15 say whether they go and look at charter schools. I
16 cannot say whether they try to find the -- the
17 schools that have a diverse population and -- and
18 consistently high standardized test scores.

19 Q And this opinion that removing
20 race-based accessions will not harm recruitment, you
21 didn't conduct any study to arrive at that
22 conclusion, right?

1 A Correct.

2 Q You didn't conduct a survey of
3 enlisted service members, correct?

4 A Correct.

5 Q I'm going to ask you the same
6 questions about your opinion on page 45 that
7 removing race-based accessions will not harm
8 retention.

9 So again, what methodology did you use
10 to reach this conclusion?

11 A My experience.

12 Q Again, didn't do any studies, correct?

13 A Correct.

14 Q Didn't do a survey of enlisted service
15 members.

16 A Correct.

17 Q Correct. I just wanted to ask you,
18 and then maybe we can take a break.

19 On page 46, bottom of page 46, you
20 mentioned three pivotal experiences in your career
21 where a more experienced officer pulled you aside
22 and advised you to correct course.

1 A Uh-huh.

2 Q You note that they are all three
3 white, but you took their advice to heart. What
4 were those experiences?

5 A One was a, "Hey, get off your ass and
6 get your PME done because we're -- we're looking
7 to -- to groom you and advance you. And if -- if
8 you don't get off your ass, then it's your fault."

9 Q And forgive my ignorance, but PME
10 stands for?

11 A Oh, Professional Military Education.

12 Q Okay. And what were the other
13 experiences?

14 A One was as a CAT director, Crisis
15 Action Team director. The colonel above me -- I was
16 a lieutenant colonel at that time -- advised me,
17 Hey, I'm trying to have everybody like me, and I --
18 you don't need that. You need to actually get them
19 to do what they're supposed to be doing and -- and
20 get on them." And I said, "You know what? You're
21 right." And -- and I did.

22 Q Do you remember that third experience?

1 A Yes. A guy who -- Tick Pierce, or
2 Kirk Pierce, who is retired 3-star and First Air
3 Force Commander, and he's on the Board of Governors
4 for the Civil Air Patrol. I worked for him while I
5 was an A-3, the National Guard Bureau's Director of
6 Operations. And he gave me advice on -- on how to
7 better corral my people to get their -- get their
8 taskers in faster so -- so that all of A-3 looks
9 good. And so -- and I said -- and I took his
10 advice, and it worked.

11 MR. ROBINSON: Okay. Let's take a
12 break.

13 (A recess was taken)

14 MR. CONNOLLY: All right. Before we
15 get going, I just want to make something clear for
16 the record.

17 For the bottom of page 21 of General
18 Walker's report starting with the sentence --
19 referring to the sentence that starts: "I know
20 firsthand."

21 For that sentence we'll issue an
22 amended report to make clear that General Walker

1 does not intend to testify about individuals who are
2 currently in active service.

3 And for page 34, for the paragraph,
4 bottom paragraph that starts: "When I served in the
5 department." In this -- in our amended report, in
6 General Walker's amended report, he will also amend
7 this paragraph to make clear that General Walker
8 does not intend to testify about individuals
9 currently in active service in this paragraph.

10 BY MR. ROBINSON:

11 Q Thank you. I have a few clarifying
12 questions about that.

13 So first, on page 21, that sentence
14 that counsel referred to beginning with "I know
15 firsthand," General Walker wanted to confirm that
16 you are no longer relying on conversations you had
17 with those officers serving on active duty in
18 forming your opinion in this section of your report,
19 correct?

20 MR. CONNOLLY: Objection. In this
21 sentence of the report.

22 THE WITNESS: Correct.

1 BY MR. ROBINSON:

2 Q Okay. And now that you're no longer
3 relying on those conversations with officers serving
4 on active duty, how if at all does this affect your
5 opinion in this case?

6 A It doesn't.

7 Q Okay. And in terms of conversations
8 you had with officers who are no longer in active
9 service, who did you speak with?

10 A Lieutenant General Retired Rod Bishop,
11 Major General Retired Joe Arbuckle, and, quite
12 honestly, I can just tell you through meetings that
13 we have had on Zoom, any -- and I can say with a
14 fair amount of confidence any general officers and
15 colonels who are in STARRS, the Calvert Task Group
16 and the MacArthur Foundation.

17 Q When did you speak with -- is it
18 General Bishop?

19 A Yes. Lieutenant General, 3-star. My
20 first time possibly was, eh, late -- yeah, late
21 2021.

22 Q And you talked to him specifically

1 about -- well, what did you talk to him about?

2 A Talked to him about all sorts of
3 issues going on in the -- in the Air Force. And
4 then -- then he -- he -- he -- he -- I got to
5 him -- I -- I was introduced to him by --

6 Oh, so here's another one. Brigadier
7 General Tracey Siems, S-I-E-M-S. She's a classmate
8 of mine at the Academy. She introduced me to
9 General Bishop, and -- because she and I had
10 conversations about this as well. And she -- she
11 was in the Pentagon at the time when I was having
12 these sort of conversations with her. She's retired
13 now.

14 And, again, she introduced me to
15 General Bishop, and then General Bishop, we just
16 started talking about all sorts of issues,
17 readiness, wokeness, and -- and the things going on
18 at the Academy specifically, like lowering
19 standards, lowering -- being more lenient on the
20 honor code, not doing -- not performing training on
21 the fourth class cadets like we used to. And the
22 Purple Rope cadets.

1 Q Did you talk with General Bishop about
2 the Air Force's efforts to increase the racial and
3 ethnic diversity of the Officer Corps?

4 A Yes.

5 Q What did -- what did you -- what did
6 he say about that?

7 A He said, "Well, if that's what they
8 want to do, fine, but -- but you can't do it by
9 lowering the standards because everybody is going to
10 know."

11 Q And --

12 A And his general opinion was it would
13 cause disaster.

14 Q You also said you spoke with Joe
15 Arbuckle?

16 A Joe Arbuckle.

17 Q When was that?

18 A Well, around the same time, maybe just
19 a little bit after. And he's a member of STARRS.
20 And there's a time when I had gone out to one of the
21 football games out there, must have been
22 October/November of '21, and met with then -- I got

1 to meet them face-to-face. Met for dinner with
2 Lieutenant ~~Major~~ Bishop, Major General Arbuckle, and
3 Colonel Ron Scott.

4 Q You said that you also had Zoom
5 meetings with some officers?

6 A Yes.

7 Q Was this in connection with STARRS and
8 the Calvert Group?

9 A Yes.

10 Q So those -- so STARRS is a group,
11 correct?

12 A Correct.

13 Q How often do you meet with other
14 officers on Zoom meetings for STARRS?

15 A They have a meeting every Tuesday at
16 8:30 Cent- -- Mountain Time, 10:30 Eastern. And
17 sometimes I'm able to make it, sometimes I'm -- I
18 cannot, I'm busy. But I try to make it whenever I
19 can. And they will always -- well, there'll usually
20 be members of Calvert Task Group and MacArthur
21 Foundation on there talking about what's going on at
22 United States Naval Academy and West Point.

1 Q So they aren't separate meetings for
2 each group. They are one meeting that officers from
3 all three of these groups attend?

4 A Yes. The STARRS meeting is primarily
5 for STARRS, but we welcome any -- anybody who wants
6 to come on there. And -- and we talk about what's
7 going on. Sometimes have discussions, sometimes
8 have debate.

9 Q Is that called the STARRS meeting on
10 the Zoom invite, do you know?

11 A It -- now that I know it happens, let
12 me try and think about it. It's called the STARRS
13 Staff Meeting is what it's called.

14 And STARRS, it's Stand Together
15 against Racism and Radicalism in the Services.

16 Q And racism in that acronym, what do
17 you understand that to refer to?

18 A Racism in all kinds going both ways.

19 Q And have you talked in that group
20 about this case?

21 A No.

22 Q You said you talked about what's going

1 on at the Naval Academy and West Point. What did
2 you mean?

3 A Over the last few years, all -- all
4 sorts of issues going on at all of the service
5 academies. Both West Point and Annapolis, as well
6 as Air Force Academy having a whole lot more honor
7 cases, and -- and they are just letting them slide.
8 A lot of them --

9 There's one incident where 200 of them
10 should have been **wrong,** and they just tried to make
11 an example out of a few. I said, "Holy smokes,
12 things are -- when I was there, no. We had high
13 standards."

14 Talking about -- one of the other
15 things that we are concerned about is, when I went
16 through and when most of the senior officers went
17 through any of the service academies, the professors
18 were at least -- when I went through and graduated
19 in 1988, one out of all the professors was a
20 civilian. All the rest of them were **uniform.**
21 And -- and -- and these professors could be mostly
22 Air Force, but some of them were Navy, some were

1 Army. And one -- you know, one Marine. We had one
2 Marine air officer commanding.

3 But -- but -- but again, it's all --
4 all military people. Over the years now it's
5 somewhere between 50/50, 60/40 mix at all the
6 academies, and we're seeing a degradation in the
7 quality of output.

8 Q In these Zoom meetings, have you
9 mentioned your involvement as an expert witness in
10 this case at all?

11 A No.

12 Q All right. When you talk to other
13 officers about this issue on page 21 and 22 that
14 we're referring to, have you spoken to anyone who
15 disagrees with you?

16 A Oh, yes.

17 Q Who -- who is that? And just those
18 who are not on active duty.

19 A I am pretty sure I brought it up with
20 Mary O'Brien, but she's -- she's a true believer.
21 But again, just a difference of opinion, so we -- it
22 wasn't an argument, it was just...

1 And also certain officers, weren't
2 general officers, and -- and again, true believers.

3 So let's see, trying to think who is
4 off active duty now. Rich Clark, but, you know --

5 Q So it's fair to say you spoke with
6 some officers who -- did they express a opinion that
7 improving the racial and ethnic diversity of the
8 Officer Corps is a -- an important goal for the
9 military?

10 MR. CONNOLLY: Objection, form.

11 THE WITNESS: So when you say as an
12 important goal for the military, do you -- are we
13 specifying for operational and combat reasons or are
14 we just specifying because -- because it will maybe
15 politically make us look better? Which one are
16 you --

17 BY MR. ROBINSON:

18 Q So not politically make us look
19 better, but I also wouldn't restrict it to
20 operational reasons.

21 So let's use the term readiness," that
22 improving the racial and ethnic diversity of the

1 Officer Corps would improve military readiness. In
2 your conversations with these officers, did -- did
3 they ever express that view?

4 MR. CONNOLLY: Objection, form.

5 THE WITNESS: Some -- some did.

6 BY MR. ROBINSON:

7 Q So there's a difference of opinion,
8 and you disagree with them.

9 A Uh-huh.

10 Q Okay. Turning to page 34. This was
11 the second section that your counsel noted. You
12 would be providing a revised report. So I just
13 wanted to confirm, you are no longer relying on
14 conversations you had with those serving on active
15 duty for this sentence, correct?

16 A Correct.

17 Q And now that you're no longer relying
18 on those conversations, how if at all does that
19 affect your opinions in this case?

20 A Doesn't affect it at all.

21 Q And I'll just read again what you said
22 here for context.

1 You say: "When I served in the
2 Department of the Air Force Office of Diversity and
3 Inclusion, I always thought the military senior
4 leadership was pushing a narrative that few warriors
5 actually believed. I knew that to be true because I
6 talked to the troops inside and outside of the
7 Pentagon and asked for their opinions. Many were
8 initially afraid to tell me what they really felt,
9 probably because they assumed that, as a black
10 officer serving in that office, I was totally on
11 board with the narrative. But once I gained trust,
12 I heard how many in the military really felt about
13 the DEI program. They did not buy it."

14 So just as to senior military leaders
15 who are now retired or inactive, who did you speak
16 with who said that they did not buy the DEI program?

17 MR. CONNOLLY: Objection, form.

18 THE WITNESS: And on that I will start
19 with, again, the senior officers in STARRS, Calvert
20 Task Group, and MacArthur Foundation. But I can
21 also give names of -- of the -- of Colonel Mark
22 McDaniel. Senior Master Sergeant David Twigg.

1 Senior Master Sergeant Robert Gossard. Colonel
2 Johnnie Ryan, and it's -- it's not John. It's --
3 it's actually Johnnie. It's J-O-H-N-N-I-E Ryan.

4 Brigadier General Paige Hunter. The
5 "Hunter" name brings up somebody you can't -- you're
6 not going to be able to talk to him because he just
7 died recently, but Lieutenant Colonel Rick Hunter.

8 Let me make sure. People are retired.

9 Army Master Sergeant Ron Johnson.

10 Army Lieutenant Colonel Mac Warner. And it -- it
11 will take me a while to remember the names, but --

12 Q That's okay. Let me ask you this:
13 Those conversations you had with the individuals you
14 just listed, were those in the Zoom conversations or
15 were --

16 A No.

17 Q -- some of them --

18 A The -- all -- all -- all those other
19 names are people who I've talked to in -- in person.

20 Q And how did you come to have these
21 conversations with them?

22 A Well, at -- at the time when I was

1 assigned onto the JDEC, I -- I -- in talking with
2 certain people. And some of them I didn't even have
3 to coax. They'd say, "Okay, but you're really
4 buying all this?" I said, "Hey, what do you think
5 about it?" And they would let me know.

6 Q Okay. You've offered yourself as an
7 expert witness in this case, correct?

8 A Correct.

9 Q What is your area of expertise?

10 MR. CONNOLLY: Objection, form.

11 THE WITNESS: Military operations at
12 the tactical, operational, and strategic level.

13 BY MR. ROBINSON:

14 Q If I turn your attention to page 37 of
15 your report. Page 38, actually.

16 A Okay.

17 Q Let's try this again.

18 A Okay.

19 Q Page 47.

20 A Gotcha. Third time's a charm.

21 Q You offer an opinion here that
22 removing race-based accessions will not harm the

1 military's institutional legitimacy, correct?

2 A Correct.

3 Q What methodology did you use to reach
4 this conclusion?

5 A Common sense methodology.

6 Q When you say the common sense
7 methodology, what do you mean by that?

8 A Removing race-based accessions is not
9 ne- --

10 Well, having race-based accessions is
11 not necessary to get whatever it is that the DoD
12 wants. And if -- if they are claiming that -- that
13 not having proportional officers is -- is going to
14 defy, or is going to harm institutional legitimacy,
15 I say then -- then having race-based accessions,
16 removing that, that doesn't mean you can't use other
17 things like, again, propping up these particular
18 demographic groups in their -- in their particular
19 municipalities propping up their education. Getting
20 out there and having programs that -- that spur
21 competition and -- and inspire them.

22 And so you could do it without all of

1 that. And so ~~race-based accessions is not going to~~
2 ~~hurt the --~~ removing the race-based accessions is
3 not going to harm this -- this claim of -- of losing
4 legitimacy if we don't have the proper proportions.
5 So I -- I'm sorry, specifically zeroing in on
6 race-based accessions.

7 Now, if they claim that having that
8 proportion is going to do that, which, you know, I
9 haven't seen them prove that, I -- I -- I
10 assume -- I said, "Okay, let's say that is an
11 assumption that I would agree with. You don't have
12 to do it with race-based accessions." So that's the
13 point I was trying to make.

14 Q Got it. So I understand the point
15 you're trying to make.

16 A Uh-huh.

17 Q And I understand your opinion.

18 A Yes.

19 Q But just in terms of, like, the basis
20 for that opinion and the methodology --

21 A Uh-huh.

22 Q -- how did you arrive at that opinion?

1 Was it just -- was it thinking about
2 the issue?

3 A Yes.

4 Q Okay. Was it anything else?

5 A No.

6 Q Okay. And let's set aside for a
7 moment the race-based accessions aspect.

8 A Uh-huh.

9 Q And let's just focus on diversity in
10 the Officer Corps.

11 Do you think that if the race -- if
12 the Officer Corps were to get less racially and
13 ethnically diverse, that could harm the military's
14 institutional legitimacy?

15 MR. CONNOLLY: Objection, form.

16 THE WITNESS: Now, that I'd have to
17 ponder for a while, and that would all depend on if
18 our military is winning or not in my opinion. And
19 because, again, what I've seen of Americans,
20 Americans love a winner. And so there's -- I
21 suspect there would be some superficial people who
22 would take an affront to the -- to the slimming down

1 of racial proportions. That's -- but there's people
2 who get worked up about anything.

3 BY MR. ROBINSON:

4 Q You are not offering any opinion in
5 this case about whether, if the Officer Corps became
6 less racially and ethnically diverse, that could
7 harm the military's institutional legitimacy.

8 MR. CONNOLLY: Objection, form.
9 Objection, vague.

10 THE WITNESS: Yeah, I'd -- I'd have to
11 hear that question again, because even I was
12 wondering what are you asking me.

13 BY MR. ROBINSON:

14 Q So I think you said in the prior
15 answer that you would need to think about this
16 question. Setting aside race-based accessions --

17 A Uh-huh.

18 Q -- if the Officer Corps were to become
19 less racially and ethnically diverse, could that
20 harm the military's institutional legitimacy.

21 So based on that answer, I'm just
22 asking you: Are you offering an opinion in this

1 case as to how a less racially and ethnically
2 diverse Officer Corps could affect the military's
3 institutional legitimacy?

4 MR. CONNOLLY: Objection, form.
5 Objection, vague.

6 THE WITNESS: I will say this: It all
7 depends on how it's spun politically. If people
8 make a big deal out of it, it probably will catch
9 fire that way.

10 BY MR. ROBINSON:

11 Q So are you offering an opinion about
12 whether a less racially and ethnically diverse
13 Officer Corps to harm the military's institutional
14 legitimacy?

15 MR. CONNOLLY: Objection, form.
16 Objection, vague.

17 THE WITNESS: And so best way I can
18 answer that is I don't think that's what the
19 American people are looking for.

20 BY MR. ROBINSON:

21 Q The American people could react
22 negatively if the Officer Corps were to become less

1 diverse.

2 MR. CONNOLLY: Objection to form.

3 THE WITNESS: Lord knows how they
4 would react. I -- I think they -- they would be
5 more concerned about whether our military is capable
6 of defending the United States.

7 BY MR. ROBINSON:

8 Q And I just don't think I've heard a
9 yes or no to this question.

10 Are you offering an opinion on whether
11 a racially and ethnically diverse Officer Corps is
12 relevant to the military's institutional legitimacy?

13 MR. CONNOLLY: Objection, form.

14 Objection, vague.

15 THE WITNESS: So I don't think it is
16 relevant to the legitimacy.

17 BY MR. ROBINSON:

18 Q Okay. And you are offering that
19 opinion in this case.

20 A Yes.

21 Q What is the basis for that opinion?

22 A Based on experience and seeing what

1 the American people really, really want and say that
2 they want.

3 Q Okay. Anything -- is it based on
4 anything else?

5 A No surveys.

6 Q No studies?

7 A No studies.

8 Q Okay. And we were just talking about
9 domestic legitimacy I think because you referred to
10 the American people.

11 A Uh-huh.

12 Q Are you offering an opinion about how
13 a racially and ethnically diverse Officer Corps
14 could affect the international legitimacy of the
15 military?

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: I -- I will say my
18 opinion on that and with our allies they won't care,
19 as long as they know that we will keep them from --
20 from being beaten. And for enemies, our enemies
21 might use it propaganda-wise.

22 BY MR. ROBINSON:

1 Q And what's your basis for that
2 opinion?

3 A Seeing it happen.

4 Q Okay. You haven't -- again, haven't
5 done any studies, right?

6 A Correct, but I've worked with allies
7 in war, in actual war, and in exercises. Really
8 what they're concerned about is the ~~American is~~
9 going to keep us from having to speak another
10 language.

11 Q Have you reviewed any research on this
12 question?

13 MR. CONNOLLY: Objection, form.

14 Objection, vague.

15 THE WITNESS: No.

16 BY MR. ROBINSON:

17 Q Okay. On page 47 you note that "The
18 military in 2024 is an all volunteer force. The
19 individuals who comprise it are those who have
20 self-selected from among the broader population.
21 Accordingly, the demographics of the services are
22 the aggregate product of individual preferences

1 rather than the result of racial percentages
2 dictated from the top down."

3 You said that, right?

4 A Yes.

5 Q Excuse me. The service academies can
6 affect the demographic makeup of the Officer Corps
7 by deciding which applicants they choose to admit,
8 correct?

9 MR. CONNOLLY: Objection, form.

10 THE WITNESS: That question one more
11 time, sorry.

12 BY MR. ROBINSON:

13 Q The service academies can affect the
14 demographic makeup of the Officer Corps by deciding
15 which applicants they choose to admit.

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: Well, just based on the
18 numbers and the percentages of officers put out by
19 the service academy, I -- it wouldn't make a dent
20 whether they did or not.

21 BY MR. ROBINSON:

22 Q Would you agree that graduates of the

1 service academies disproportionately go on to senior
2 leadership positions in the military?

3 MR. CONNOLLY: Objection, form.

4 THE WITNESS: That used to be the
5 case. In the Air Force, it's fine. 50/50. As a
6 matter of fact, ROTC is overtaking us.

7 Navy, I'm not sure how that goes. But
8 I know once upon a time the -- you're a Naval
9 Academy grad; if you're not, you're not making it to
10 flag officer. I don't know that's the case anymore.
11 I don't -- but I just don't know what the proportion
12 is.

13 BY MR. ROBINSON:

14 Q Okay. You haven't look at the Naval
15 Academy data on that issue.

16 A Not an that issue.

17 Q You yourself are a graduate of the Air
18 Force Academy, correct?

19 A Yes.

20 Q It's certainly not unusual for flag
21 officers to be graduates from the service academies,
22 right?

1 A It's not --

2 MR. CONNOLLY: Objection, form.

3 THE WITNESS: It's not unusual.

4 BY MR. ROBINSON:

5 Q Okay. Ask you some questions about
6 the Naval Academy and their admissions process,
7 specifically.

8 General Walker, you've never served on
9 the U.S. Naval Academy Admissions Board, correct?

10 A Correct.

11 MR. CONNOLLY: Objection, form.

12 BY MR. ROBINSON:

13 Q You've never been a reader of Naval
14 Academy applications for admissions?

15 MR. CONNOLLY: Objection, form.

16 THE WITNESS: Correct.

17 BY MR. ROBINSON:

18 Q You were asked in this case to address
19 whether there are any harmful effects to using race
20 in admissions at the United States Naval Academy,
21 correct?

22 MR. CONNOLLY: Objection, form.

1 THE WITNESS: I believe so, yes.

2 BY MR. ROBINSON:

3 Q I think it's referenced in page 14 of
4 your report if you'd like to take a look.

5 What is your understanding of how the
6 Naval Academy uses race in the admissions process?

7 A My general understanding is that they
8 use racial preferences to -- to give additional
9 points, and -- and they will also accept lower SAT
10 scores from certain minorities.

11 Q Are you aware of any other way in
12 which the Naval Academy uses race in the admissions
13 process?

14 A No.

15 Q Are you aware that the Naval Academy
16 has no quotas for minority applicants?

17 MR. CONNOLLY: Objection, form.
18 Objection, lack of foundation.

19 THE WITNESS: I'm not aware, but,
20 again, "quota" is a word that the DoD tries to avoid
21 like the plague.

22 BY MR. ROBINSON:

1 Q You don't know one way or the other.

2 A I don't know what way or the other.

3 MR. CONNOLLY: Objection, form.

4 BY MR. ROBINSON:

5 Q Do you know whether the Naval Academy
6 uses race to determine whether an applicant is
7 qualified or not qualified?

8 MR. CONNOLLY: Objection, form.





9 THE WITNESS: No.

10 BY MR. ROBINSON:

11 Q Are you familiar with the concept of
12 the Whole Person Multiple?

13 A I am.

14 Q What's your understanding of that
15 concept?

16 A My understanding is across all of the
17 service academies, including    merchant
18 Marine  ~~cademy~~, and certain other military schools,
19 is that they're looking for leadership, academics,
20 athleticism, desire to serve based on their -- their
21 interviews and their essays, and -- and then
22 other -- other interesting things about them that --

1 that, oh, I grew up on a farm all my life and I was
2 homeschooled, but -- but I did manage to play on
3 this -- this high school let me play on their
4 football team.

5 They are looking for unusual
6 stories.

7 Q So your understanding of the Whole
8 Person Multiple is that the Naval Academy uses the
9 Whole Person Multiple to understand stories that
10 people are telling about their experiences?

11 MR. CONNOLLY: Objection, form.

12 THE WITNESS: My understand it is that
13 Naval Academy and all of the academies try to use
14 that whole person concept to try and determine
15 whether the -- that particular candidate will not
16 only be successful making it through the academy but
17 will become a career officer.

18 BY MR. ROBINSON:

19 Q So separate from a whole person
20 concept, are you familiar with a -- something called
21 the Whole Person Multiple?

22 A That one I haven't heard of.

1 Q Okay. So you don't know whether the
2 Whole Person Multiple considers an applicant's race,
3 correct?

4 A I do not know that.

5 Q Okay. You mentioned two ways in which
6 you believe the Naval Academy uses race in the
7 admissions process. I want to make sure I have them
8 down.

9 One, you think that they give extra
10 ray points to racial minorities, and, two, that they
11 accept lower SAT scores for minorities.

12 Did I understand that correctly?

13 MR. CONNOLLY: Objection, form.

14 THE WITNESS: Correct.

15 BY MR. ROBINSON:

16 Q If it were the case that in fact the
17 Naval Academy does not award extra points for racial
18 minorities, would that change your opinion in this
19 case about the harmful effects of the Naval
20 Academy's admissions process?

21 MR. CONNOLLY: Objection, form.

22 Objection to the extent you're asking the witness

1 for a legal conclusion.

2 THE WITNESS: So just that particular
3 thing alone, I think -- I -- I think it would
4 still -- getting rid of that alone but keeping
5 the -- but keeping lower SAT scores, that's not
6 going to solve the -- the --

7 People will know one or the other or
8 both. It's not something that can be kept secret.
9 And thus, it will cause discord.

10 BY MR. ROBINSON:

11 Q Let's assume --

12 A Uh-huh.

13 Q -- for purposes of this question both
14 that the Naval Academy does not use points or add
15 points to racial minorities and that they don't
16 accept lower SAT scores from minorities.

17 If both of those things were true,
18 would that change your opinion about the harmful
19 effects of the Naval Academy's admissions process as
20 it relates to race?

21 MR. CONNOLLY: Objection. Objection,
22 form. Objection, lack -- lack of foundation.

1 Objection to the extent you're asking the witness
2 for a legal conclusion.

3 THE WITNESS: So getting rid of both
4 of those and just saying, hey, we're going to put in
5 the extra work and go find racial minorities who
6 are -- who have a propensity to serve and who
7 would -- who would flourish in our program, then I
8 would -- then I would right then, race-based,
9 removing those two would -- would let -- would get
10 me into the camp where I would go along with that.

11 BY MR. ROBINSON:

12 Q What if the Naval Academy considered
13 race as one of many factors that it could consider
14 in evaluating the whole person but didn't assign any
15 points and didn't accept lower SAT scores.

16 If that were the process. It's one
17 factor you can consider. You don't have to consider
18 it. You can consider it.

19 Would your opinion change at all?

20 MR. CONNOLLY: Objection, form.

21 Objection to the extent you're asking the witness
22 for a legal conclusion.

1 THE WITNESS: Something like that,
2 I -- I -- I would really, really have to ask people
3 on the admissions board if they used race. I would
4 say, "How? What is it about this particular
5 person's race turned the tables here?" I would have
6 to know exactly what their thinking was on that.

7 BY MR. ROBINSON:

8 Q Okay.

9 A So -- so it would have to be specific
10 circumstances, and I -- I would be interested -- and
11 I -- I probably wouldn't go along with it, but I
12 would be interested to know maybe they could
13 convince me.

14 Q In theory, if that's the way the Naval
15 Academy's admissions process operated, you would at
16 least be open to hearing them out as to why they are
17 using race in that context.

18 MR. CONNOLLY: Objection, form.
19 Objection, misstates testimony. Objection,
20 speculation. Objection to the extent you're asking
21 the witness for a legal conclusion.

22 THE WITNESS: So I would be open to

1 hearing them out.

2 BY MR. ROBINSON:

3 Q And if they told you that one of the
4 reasons they considered race was to attract a
5 diversity of viewpoints because sometimes race can
6 correlate with different viewpoints, would that be
7 an acceptable use of race, in your opinion?

8 MR. CONNOLLY: Objection, form.

9 THE WITNESS: If they told me that it
10 would turn into a debate because I would ask them,
11 "Oh, okay, what are these viewpoints that black
12 people have? What are these viewpoints that you're
13 looking for that you think black people have?"

14 BY MR. ROBINSON:

15 Q Do you believe that the Naval Academy
16 admits some midshipmen who would not have been
17 admitted but for their race?

18 A Well, just looking at the Task Force 1
19 report, yes.

20 Q Is there any other basis for that
21 conclusion?

22 A Knowing now or -- or -- or being

1 reasonably sure now that they're using a race-based
2 preferences and you're seeing people who are on
3 academic parole and -- and were failing out, then --
4 then yes.

5 Q So I just want to be clear on the
6 basis for the opinion.

7 You said a Task Force 1 report and
8 data on performance? Is that --

9 A Yes.

10 MR. CONNOLLY: Objection, form.

11 BY MR. ROBINSON:

12 Q Anything else?

13 A No, and -- and just -- just putting
14 two and two together. And -- and seeing what the --
15 the rate of dropout or the rate of academic failure
16 out is, then -- then it tells me that the admissions
17 office isn't doing their job in finding people who
18 can make it through the program.

19 Q You don't have any data on how many
20 midshipmen each year are admitted because of their
21 race, do you?

22 A I do not.

1 Q Okay. You don't know what would
2 happen to the demographics of the Naval Academy's
3 brigade of midshipmen if the Academy were prohibited
4 from showing race in the admissions process?

5 MR. CONNOLLY: Objection, form.

6 THE WITNESS: I don't think anybody
7 does. I -- I think people have been putting out
8 reports and studying data on that and coming with
9 the different conclusions, but I --

10 But we really, really don't know what
11 would happen. We could speculate that the minority
12 proportion will go down, but it might not. It might
13 go up. It all depends on what's happening in this
14 country and what's motivating people to want to
15 serve.

16 BY MR. ROBINSON:

17 Q It's possible, though, that the
18 brigade could become less racial and ethnically
19 diverse, right?

20 A Anything is possible.

21 MR. CONNOLLY: Objection, form.

22 BY MR. ROBINSON:

1 Q Do your opinions about the harmful
2 effects of considering race in the admissions
3 process also apply to gender?

4 MR. CONNOLLY: Objection to form.

5 THE WITNESS: Yes.

6 BY MR. ROBINSON:

7 Q Why do they apply, say?

8 MR. CONNOLLY: Objection, form.

9 Objection, vague.

10 THE WITNESS: Because I think they
11 apply because of standards.

12 BY MR. ROBINSON:

13 Q What do you mean by that?

14 A Meaning that the institution sets
15 standards, and if -- if everybody meets those
16 standards then -- then everybody knows that they are
17 all on the -- on the same playing field.

18 Q Is your opinion in this case based on
19 an assumption that the Naval Academy sets different
20 standards for minority and nonminority applicants?

21 MR. CONNOLLY: Objection, form.

22 THE WITNESS: Yes.

1 BY MR. ROBINSON:

2 Q Is it your view that race conscious
3 admissions policies have always been wrong or do you
4 think that they may have been justified at one point
5 in time?

6 MR. CONNOLLY: Objection, form.

7 THE WITNESS: So we go back -- let's
8 go all the way back to -- the **thwartings** when the
9 Department of the Navy was adamant against having
10 any black Americans in the Officer Corps while the
11 Army had already started and was -- and was
12 accelerating on it.

13 Then, yes.

14 BY MR. ROBINSON:

15 Q At some point in time, though, you
16 think that that changed, correct?

17 A At some point, yes. And I -- in my
18 opinion just talking with older grads of different
19 service academies, it -- it -- it probably got a lot
20 better in mid to late '80s.

21 Q The Officer Corps became more diverse
22 over time?

1 A Yes.

2 Q So it became less necessary, in your
3 view, for the academies to consider race in the
4 admissions process.

5 MR. CONNOLLY: Objection, form.
6 Objection, misstates testimony.

7 THE WITNESS: So back when there was
8 active overt and -- and ~~rally of the flag~~
9 discrimination, definitely. Nowadays, no.

10 BY MR. ROBINSON:

11 Q Aside from that overt discrimination,
12 do you think that considering race in the admissions
13 process could have been appropriate at a certain
14 time because of how homogenous the Officer Corps
15 was?

16 MR. CONNOLLY: Objection, form.

17 THE WITNESS: No.

18 MR. ROBINSON: Okay. I'll hand you an
19 exhibit. This will be Exhibit 10.

20 (Deposition Exhibit 10 marked)

21 BY MR. ROBINSON:

22 Q This is your rebut -- rebuttal report

1 in this case.

2 A Gotcha. Thank you so kindly.

3 Q And ask you some of the same questions
4 I asked before:

5 How did you go about preparing this
6 report?

7 A I -- I -- I was given the testimonies
8 and -- and disclosure reports from various
9 witnesses, the defendant's witnesses.

10 Q And what did you do when you received
11 those?

12 A Read them and -- as a matter of fact,
13 to -- to clarify earlier when you say how I prepared
14 my oral report, there's another thing I did besides
15 the reading. I watched a lot of speeches. I
16 watched a lot of videos of -- of different -- of
17 different professors or military leaders giving
18 speeches. And so -- so watching videos of speeches
19 as well.

20 Q Okay. Which speeches did you watch?

21 A Off the top of my head, Colin
22 Powell's. And I also watched speeches and round

1 tables, round table between Harvard law professor
2 Randall Kennedy, who is pro affirmative action, and
3 so Harvard Law Professor Randall Kennedy; and Brown
4 economics professor, Glenn Loury. And -- and they
5 went back and forth on giving each other -- and --
6 and I have to say it was very cordial debate.

7 And at the end they found -- they --
8 they found something to agree on.

9 Q What was that?

10 A That -- and I couldn't even believe I
11 heard Randall Kennedy saying this. But he did
12 admit, he said, "You know what? If we can fix the K
13 through 12 so that -- so that these schools aren't
14 failing our children, then, yeah, he don't need --
15 we don't need affirmative action." I was surprised
16 he admitted that.

17 Q Do you know Colin Powell's views on
18 affirmative action?

19 A I don't.

20 Q Back to this rebuttal report, you said
21 you reviewed the reports that were provided to you.
22 Did you do anything else to prepare this rebuttal

1 report?

2 MR. CONNOLLY: Objection. I'll just
3 remind the witness not to disclose the contents of
4 any communications with counsel.

5 THE WITNESS: Yeah. So writing and
6 then reading it back to myself out loud so that I
7 can see how I sound. ~~Is that -- that way --~~ that
8 way I know I'm getting my point across or not.

9 And then going back some more and
10 discovering certain things that I said ~~or thought~~
11 that made me wonder what the **witness** thinks about
12 that. And going back in there to refresh my memory.

13 But -- but again, yes, just a lot of
14 reading, writing, and talking in front of a
15 mirror.

16 Q Did you talk to anyone besides counsel
17 about this rebuttal report?

18 A I told my girlfriend, "Hey,
19 I -- I -- I -- sorry, I can't. All these things you
20 want to do, I'm busy. I'm -- I'll doing a report."

21 Q And same question as before. Did
22 counsel provide you with any facts or data that you

1 relied on in forming your opinions in this rebuttal
2 report?

3 MR. CONNOLLY: Objection. That is a
4 "yes" or "no" question.

5 THE WITNESS: No.

6 BY MR. ROBINSON:

7 Q Okay. You said that you read some
8 materials provided to you. Did you read the report
9 of Dr. Haney?

10 A Yes.

11 Q You saw that Dr. Haney cited some
12 studies in her report; is that correct?

13 A Yes.

14 Q Okay. Did you read any of those
15 studies?

16 A So she cited -- she cited another one
17 of your witnesses, Lyles, in his book. And I
18 said -- well, again, we're both -- both him and --
19 and -- and Jeannette Haney cited it. I said, "Well,
20 doggone it. I better get the book." So...

21 A Because I -- I said, "Well, maybe this
22 is data."

1 Q So you read the book?

2 A Uh-huh.

3 Q And what did you conclude?

4 A I concluded that he -- he spent a lot
5 of pages to say that -- pardon the vernacular --
6 asshole leaders causes disruption in the truth.

7 Q You don't disagree with that, do you?

8 A I don't disagree with that at all.

9 Q Okay. What about his conclusions,
10 database conclusions, about the importance of racial
11 and ethnic Armies -- racially and ethnically diverse
12 Armies?

13 MR. CONNOLLY: Objection, form.

14 THE WITNESS: I -- I ultimately came
15 to the conclusion my opinion that it's bunk, because
16 he -- he brought up lots of wars where everybody was
17 the same skin color.

18 BY MR. ROBINSON:

19 Q You said you read the Haney report.
20 You said you read the Lyle book that she cited.

21 A Yes.

22 Q Did you read any other studies that

1 Dr. Haney cited?

2 A Give me -- give me a moment to...

3 Oh, so I think -- was it her or was it
4 Truesdale brought up MLDC? But -- but -- but
5 I -- I -- I did read through that, but, I mean, I
6 had read through that years ago anyway. But I went
7 back again this time, okay, what did they say? And
8 I noticed a pattern, so...

9 Q So aside from Professor Lyles' book
10 and the MLDC report, did you review any other
11 studies that Dr. Haney cited?

12 MR. CONNOLLY: Objection, form.

13 THE WITNESS: I -- I'd have to do a
14 quick leaf-through of -- of this rebuttal report
15 to -- because it's not coming to the top of my head
16 at this moment.

17 BY MR. ROBINSON:

18 Q Okay. Well, feel free to take a
19 minute and let me know.

20 A Okay. Okay, I did read that -- I'm
21 not sure who talked about it, whether it was Haney
22 or Truesdale or Miller, but -- but I did read the

1 -- yeah, the Air Force and diversity, The Awkward
2 Embrace is -- is --

3 I did look through some of the RAND
4 reports, and I had actually seen some of those same
5 RAND report~~ers~~ before while I was in uniform.

6 Oh, yeah, the ~~Wonder League~~, but I --
7 I didn't want to buy the whole book, so I found
8 whatever I could of excerpts online for free that I
9 could read with that.

10 There's another one in here that I
11 said "hell, no" because it was 110 bucks, and so I
12 did the same thing, I'll figure that out
13 ~~(indiscernible)~~.

14 Yeah, MLD -- ~~D~~ stuff. Yeah, so things
15 that that -- as far as things that Haney did, those
16 are the ones I remember.

17 Q Okay. How did you choose which
18 studies to review that Dr. Haney cited?

19 A Because she -- she was trying to make
20 a point that -- that this is going to convince me
21 that her opinion is correct. So I said, okay, let's
22 see if it does.

1 Q Okay. I take it you were not
2 convinced.

3 A I wasn't.

4 Q You reviewed those RAND studies.
5 Would you agree at least that the RAND studies
6 supported Dr. Haney's view that a diverse and
7 inclusive Officer Corps is important to unit
8 cohesion, for example?

9 MR. CONNOLLY: Objection, form.

10 THE WITNESS: So from -- from what I
11 remember in the RAND studies, diversity was a broad
12 term, a not just racial diversity. And so I could
13 find middle ground with them on those things.

14 And so to answer your question, your
15 question was did these RAND reports confirm what she
16 is saying? I think -- I think if you can stretch it
17 to say that.

18 But -- but what she's arguing for is
19 racial whereas RAND was talking about diversity as
20 a -- as a whole concept.

21 BY MR. ROBINSON:

22 Q Do you recall reviewing any studies

1 that talked about the importance of racial and
2 ethnic diversity specifically?

3 A One more time.

4 Q Do you recall reviewing any studies
5 that talked about the importance of racial and
6 ethnic diversity specifically?

7 A There was some RAND -- at least one
8 RAND that I had already read a year or two ago,
9 and -- but -- but the other -- as far as studies,
10 no.

11 Q And did that study at least support
12 Dr. Haney's opinions, in your view?

13 MR. CONNOLLY: Objection, form.

14 THE WITNESS: I did not see that --
15 that study supporting what she said. She was making
16 assumptions, in my opinion, of what that study
17 said.

18 BY MR. ROBINSON:

19 Q Do you dispute that those RAND
20 studies, when they talked about diversity, included
21 racial and ethnic diversity?

22 MR. CONNOLLY: Objection, form.

1 THE WITNESS: Do I dispute that? I
2 don't dispute that.

3 BY MR. ROBINSON:

4 Q Okay.

5 A That's why I say I can -- I can find
6 the middle ground with RAND because some of the
7 things they're saying, if they're talking about
8 diversity in the way I define it, we can agree.
9 But -- but they start tossing the race in it, then
10 I'm going to -- I'm going to agree less.

11 Q Back to Dr. **Lyles'** book for a second
12 that you said you reviewed. Did you review his
13 product MARS database that --

14 A No.

15 Q -- the book has relied on? Okay.

16 A When I started reading about that, I
17 said, "Okay, he's going through a lot of trouble,
18 again, to say, again, that bad leadership is
19 detrimental to Army's performance." And I said,
20 "And -- and just looking at some of the -- the
21 narrative examples that he -- that he relies, why
22 should I waste my time with this MARS report, or

1 this MARS database, because some of these -- again,
2 some of these battles have nothing to do with skin
3 color.

4 Q And so just to clarify your testimony
5 from before, to the extent those RAND studies are
6 talking about the importance of racial and ethnic
7 diversity specifically, you disagree with them.

8 MR. CONNOLLY: Objection. Objection,
9 form. Objection, vague.

10 THE WITNESS: Correct.

11 BY MR. ROBINSON:

12 Q Do you know a gentleman by the name of
13 Dakota Wood?

14 A I don't know him, but I would like to
15 know him.

16 Q Why do you say that?

17 A He's -- he's -- he's -- he's
18 well-known in the National Securities ~~fair.~~

19 Q Are you aware that he has also
20 submitted an expert report?

21 A I was told, yes.

22 Q Did you and he talk at all as you were

1 working on your expert report?

2 A No. I -- I -- again, I have never
3 talked to him, never met him, but I'd like to.

4 Q Have you ever --

5 A I've seen him on different interviews
6 on the TV. I've seen -- I've -- I'm pretty sure
7 I've even read a couple of articles, either the
8 Small Arms Journal, the -- no, no, no, what is it?
9 Small Wars Journal, SWJ, the -- and -- and other
10 publications that deal with national security
11 matters.

12 Q No court has ever qualified you as an
13 expert in a case, correct?

14 A Correct.

15 Q Okay. Do you intend to offer any
16 testimony at trial that was not disclosed in your
17 two expert reports?

18 MR. CONNOLLY: Objection, form.

19 THE WITNESS: From what I understand,
20 correct me if I am wrong, I cannot unless I'm asked
21 specifically.

22 BY MR. ROBINSON:

1 Q Okay. So that's a no, you don't
2 intend to --

3 A I don't intend to.

4 Q Okay. Is there anything else that you
5 want to add on the record today that you haven't had
6 a chance to discuss?

7 MR. CONNOLLY: Objection, vague.

8 THE WITNESS: No.

9 MR. ROBINSON: Okay. I'll take a
10 break for now. I don't think I have too much
11 left.

12 (A recess was taken)

13 BY MR. ROBINSON:

14 Q Welcome back, General Walker.

15 A Thank you so kindly.

16 Q Marking Exhibit 11.

17 A Uh-huh.

18 (Deposition Exhibit 11 marked.)

19 BY MR. ROBINSON:

20 Q This is from the STARRS, S-T-A-R-R-S,
21 website. This is the "About" page.

22 Do you recognize this document?

1 A I do.

2 Q Does it appear to be authentic to you?

3 A Yes.

4 Q Okay. And it says the mission
5 statement of STARRS here is: "U.S. Military
6 veterans and citizens concerned about the diverse
7 racist and radical CRT DEI ideology infiltrating the
8 military and seek to expose, stand up against, and
9 eliminate it in order to keep our country safe."

10 MR. CONNOLLY: Sorry, counsel, I think
11 you misread. You said "diverse," not -- you said
12 "diverse," not "divisive."

13 BY MR. ROBINSON:

14 Q I'm sorry for that. You're correct.
15 It's "divisive."

16 With that correction, did I read that
17 correctly?

18 A You did.

19 Q And that is STARRS' mission, correct?

20 A That is.

21 Q You agree with that mission?

22 A I agree.

1 Q Okay. And turning to the second page
2 of this document, this lists what STARRS is against.

3 A Uh-huh.

4 Q "STARRS is against Marxist
5 collectivism and one-party rule, socialism,
6 government control of the economy and personal
7 property, CRT which destroys unit cohesion, pits one
8 group against another, politically correct policies
9 lowering standards, equity, meaning equal outcomes
10 based on racial or gender quotas, diversity and
11 inclusion race and gender selection criteria versus
12 meritocracy."

13 Read that correctly?

14 A You did.

15 Q Do you agree with all of that?

16 MR. CONNOLLY: Objection, form.

17 Objection, vague.

18 THE WITNESS: I don't have an argument
19 against any of those things.

20 BY MR. ROBINSON:

21 Q You like STARRS are against each of
22 these --

1 A Yes.

2 MR. CONNOLLY: Sorry. Objection,
3 form.

4 BY MR. ROBINSON:

5 Q Is Rod Bishop the leader of STARRS?

6 A Rod is the CEO, I believe, and -- or
7 is he the chairman? He's the chairman of the board
8 for STARRS, and I think Ron Scott is the CEO.

9 Oh, but no. Now -- I think the -- or
10 maybe he's the president because they just -- they
11 just brought in Matt Lohmeier to be either the
12 President or CEO, but, okay. But I'm -- I'm
13 confused on who is who is who, but...

14 Q Remind me, you are a member of STARRS,
15 correct?

16 A Yes.

17 Q Are you a board member of STARRS?

18 A I -- I -- I'm a staff member, but
19 they -- they refer to me as a board member, but I've
20 never been on a board where we've made any kind of
21 vote. They -- but they -- they referred to -- when
22 introducing me one time, it was either General

1 Bishop or Colonel Scott who said I was a board
2 member. And I wanted to say, "Don't you mean staff
3 member? Because I've never taken a vote on
4 anything. I've never -- I've -- I've never been in
5 proceedings where we need a quorum." So...

6 Q How long have you been a member of
7 STARRS?

8 A At least two years.

9 Q So you were a member of STARRS while
10 you were still working at DoD?

11 A Yes.

12 (Deposition Exhibit 12 marked)

13 BY MR. ROBINSON:

14 Q Okay. Handing you Exhibit 12. This
15 is also from the STARRS website.

16 This is testimony from General Bishop.
17 Have you seen this before?

18 A Yes.

19 Q Okay. In what context did you see it?

20 A I -- I watched him as he said it.

21 Q Okay. And I want to direct your
22 attention to something he said.

1 A Via video, yeah.

2 Q I want to direct your attention to
3 something he was saying at the bottom of page 1 and
4 on to page 2.

5 A Uh-huh.

6 Q He's talking about how the left --

7 MR. CONNOLLY: I -- which --

8 THE WITNESS: This page or --

9 MR. CONNOLLY: It goes from 1 to 3 in
10 my...

11 THE WITNESS: Yeah, I got it. 1, 3,
12 5.

13 BY MR. ROBINSON:

14 Q You-all have 1, 3, 5.

15 A Yeah, 7 and 9.

16 Q Okay, no problem. We will return to
17 that shortly.

18 A Okay.

19 Q I will mark this as Exhibit 13.

20 (Deposition Exhibit 13 marked)

21 THE WITNESS: Yes.

22 BY MR. ROBINSON:

1 Q Let's check the page numbers on this.
2 Shoot, same issue.

3 A No. Well, mine is fine, but maybe
4 yours is bad.

5 MR. CONNOLLY: Mine -- mine is
6 missing --

7 THE WITNESS: Mine is fine.

8 MR. ROBINSON: Just for the sake of
9 efficiency, would you mind, Mike, looking on with
10 the witness in this document? It won't be long.

11 MR. CONNOLLY: I will try, yes.

12 MR. ROBINSON: Okay. If it's an
13 issue, just let me know.

14 BY MR. ROBINSON:

15 Q I just wanted to -- so have you seen
16 this before?

17 MR. CONNOLLY: Objection, form.
18 Objection, vague.

19 THE WITNESS: Oh, have I?

20 BY MR. ROBINSON:

21 Q Yes, have you.

22 A Yes.

1 Q This is testimony you gave.

2 A I -- that's me.

3 Q Okay. This is testimony you gave on
4 May 3, 2024?

5 A Correct. Well, I'm not sure if that
6 was the day I said it or if this is -- that's the
7 day they printed it afterwards, but -- but it was
8 around that time.

9 Q Oh, and by the way, STARRS -- well, I
10 don't know if it -- you told me what it stands for,
11 but this says that it's veterans standing against
12 CRT woke ideology in the military and service
13 academies, correct?

14 A Yes.

15 Q Okay. And this is testimony you
16 provided. What does it mean by "testimony"?

17 A We were asked our opinions on things
18 going on in the Air Force and the -- and the service
19 academies.

20 Q Who asked you this?

21 MR. CONNOLLY: Objection, form.

22 THE WITNESS: Who was it? We were --

1 Who did he have --

2 It was presenting to somebody, and I'm
3 trying to remember the name of that person, but then
4 they went around the virtual room on people and
5 asked "what do you think of this?" And they're
6 talking about, again, the things happening in the
7 Air Force, in the military.

8 BY MR. ROBINSON:

9 Q Sorry if I missed this in your answer,
10 but did someone at STARRS ask you to provide this?

11 MR. CONNOLLY: Objection, form.

12 THE WITNESS: Did some -- did someone
13 at STARRS ask me to -- yes, they asked me to be on
14 this -- on this video round table.

15 BY MR. ROBINSON:

16 Q Understood.

17 All right. Directing your attention
18 to page 3 toward the top, you're talking about your
19 time at the Pentagon.

20 A Uh-huh.

21 Q And you say -- this is the third
22 paragraph: "Now let's talk about what's going on

1 now. So General Bishop did mention that my last
2 assignment was in the Air Force Office of Diversity
3 and Inclusion. And Holy smokes."

4 A Uh-huh.

5 Q You said: "My position in there was
6 as an advisor, senior advisor, and as a 1-star."

7 A Uh-huh.

8 Q "Anybody who knows the Pentagon, a
9 1-star is not going to be able to go in and kick
10 over the" (indiscernible).

11 A Uh-huh.

12 Q And you said: "So my role in there
13 was to try and be a speed bump for the crazy, and
14 crazy came up quite often. But I also used that
15 time to report back to General Bishop and others in
16 STARRS here's what's going on, prepare for this, the
17 DoD, because I can't say it's just the Air Force,
18 it's the DoD, their version."

19 So while you were at the Pentagon, you
20 were reporting back to General Bishop about what you
21 were hearing at the Pentagon?

22 MR. CONNOLLY: Objection, form.

1 THE WITNESS: I was reporting back to
2 him about policies that are coming up.

3 BY MR. ROBINSON:

4 Q Okay. You were reporting to him --
5 he's retired general, correct?

6 A Correct.

7 Q -- about policies that had not yet
8 been disclosed to the public?

9 MR. CONNOLLY: Objection, form.

10 THE WITNESS: In some cases. In some
11 cases the ones that are -- were signed.

12 BY MR. ROBINSON:

13 Q Okay. Do you know if that was
14 permissible under DoD policy?

15 A Unless it's -- unless it's marked CUI,
16 then it's -- it's permissible, get to talk about it.

17 Q You didn't share with him any
18 upcoming -- upcoming policies that weren't marked
19 CUI?

20 MR. CONNOLLY: Objection, form.

21 THE WITNESS: It's -- I heard a double
22 negative in there. Uh, Uh, I didn't, or I did,

1 or --

2 BY MR. ROBINSON:

3 Q You did not --

4 A I did not --

5 Q -- discuss with him any policies --

6 A That --

7 Q -- that were CUI.

8 A Correct.

9 MR. CONNOLLY: Objection, form.

10 BY MR. ROBINSON:

11 Q Okay. And then I'll just continue
12 reading what you were saying. You said: "The way
13 they're getting there is strictly Marxist and
14 dividing all of our troops."

15 That's what it says, right?

16 A Correct.

17 Q What did you mean by that?

18 MR. CONNOLLY: Objection, form.

19 THE WITNESS: By using CRT in their --
20 in their teachings of what they wanted to call DEI
21 and saying that white troops are the oppressors and
22 they need -- they need to be -- they all have biases

1 against other nonwhite service members.

2 BY MR. ROBINSON:

3 Q You said, "They all have biases
4 against other nonwhite service members"? What were
5 you referring to?

6 MR. CONNOLLY: Objection, form.

7 THE WITNESS: Referring to -- for one
8 example, the -- that -- that Georgetown course that
9 they have senior officers going through, and then --
10 then there's other discussions in the building where
11 they say, "Hey, we feel that -- that there's too
12 many old white guys." And I go, "You're saying that
13 out loud? Holy smokes." Okay. And that is not
14 going to bring people together.

15 BY MR. ROBINSON:

16 Q Do you consider the Naval Academy's
17 admissions process to be a Marxist policy?

18 MR. CONNOLLY: Objection, form.

19 THE WITNESS: I don't know.

20 I -- I -- I don't know enough about it to make that
21 determination.

22 BY MR. ROBINSON:

1 Q Okay.

2 A And what I talk about here is not even
3 related to admissions policies. It's just the
4 training people are getting across the Air Force,
5 so-called training, and -- and presentations about
6 white oppression.

7 Q And that's because you haven't studied
8 the Naval Academy's admissions process.

9 A Correct.

10 MR. ROBINSON: All right. We have no
11 further questions.

12 MR. CONNOLLY: Okay. Can we take a
13 five-minute break and then we'll come back?

14 MR. ROBINSON: Sure.

15 (A recess was taken)

16 EXAMINATION BY COUNSEL FOR PLAINTIFF

17 BY MR. CONNOLLY:

18 Q Good evening, at this point --

19 A Good evening.

20 Q -- General Walker. Do you believe
21 that people experience conflict differently based on
22 their race or skin color?

1 A Based just on their race or skin
2 color.

3 Q Correct.

4 A No.

5 Q Do you think the Naval Academy should
6 ever consider a person's race when deciding whether
7 to admit an individual?

8 A No.

9 MR. CONNOLLY: No more questions from
10 us.

11 MR. ROBINSON: Just a brief few
12 recross.

13 EXAMINATION BY COUNSEL FOR DEFENDANTS

14 BY MR. ROBINSON:

15 Q During this last break or the prior
16 break, did you talk about your testimony under
17 questioning from me during those breaks with your
18 counsel?

19 A No.

20 Q Would you like an opportunity to read
21 and sign the transcript in this deposition?

22 A Yes.

1 MR. CONNOLLY: Yes, we will have...

2 MR. ROBINSON: Okay. Nothing further.

3 THE WITNESS: Holy smokes.

4 THE REPORTER: Parties order the
5 transcript?

6 MR. CONNOLLY: What's that? Yes,
7 please.

8 THE WITNESS: It's rush hour time in
9 D.C., but at least it's hot and humid.

10 (crosstalk)

11 MR. ROBINSON: Take a rough transcript
12 and also the normal standard transcript.

13 THE REPORTER: When would you like the
14 rough by?

15 MR. ROBINSON: Is tomorrow doable or
16 do you need more time?

17 Thank you.

18 (Proceedings concluded 5:28 p.m. EST)

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I, Mary J. Butenschoen, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceedings; that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; and that I am neither counsel for, related to, nor employed by any of the parties to the case and have no interest, financial or otherwise, in its outcome.



MARY J. BUTENSCHOEN

August 12, 2024

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2 I, Jamie Ogihara, CER, the officer before whom the
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11 related to, nor employed by any of the parties to
12 this case and have no interest, financial or
13 otherwise, in its outcome.

14

15



16

JAMIE OGIHARA, CER,

17

NOTARY PUBLIC FOR THE DISTRICT OF COLUMBIA

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Transcript of General Christopher Walker
 Conducted on August 7, 2024

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