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SUMMARIZED TESTIMONY OF LT COL MATTHEW A. DOUGLAS

Lt Col Matthew A. Douglas appeared at the investigation, was sworn, and testified substantially as follows:

I am the Military Deputy Head, Department of Operational Sciences (ENS), Graduate School of Engineering and Management, Air Force Institute of Technology. On 11 January 2017 Maj Benjamin Hazen brought me into Dr. Joseph Pignatiello's office to discuss allegations that Dr. Kenneth Shultz had made inappropriate comments in class. Maj Hazen said Lt Rachel Beightel was the complainant, but he also said that the complainant was biracial which fits the description of Lt Rachel Herald. The class is LOGM 542 which discusses the management of organizations. As I understand it the class was having a discussion on individual differences and the topic of stereotypes came up. Dr Shultz made a comment about African-American foot size implying it was related to penis size. He then said "If any of you happen to sleep with one, let me know." The accuser asked him if he would say that if there were any African-Americans in the room. Dr Shultz responded that he had said it before in class with African-Americans and it wasn't a problem. Dr. Shultz brought up a previous incident regarding his use of language and said nothing happened to him then. After class Dr Shultz asked the complainant "Was what I said inappropriate or were you offended, because there is a difference." The complainant answered "Both." A few days later I spoke with Maj Hazen about the incident and he said Dr Shultz specifically said "You know the rumor about African-American men and their large ... feet?" with an emphatic pause before the word feet. My initial thought about the incident was a sarcastic "Great." I was not necessarily surprised that Ken had made a comment that caused controversy, but I was surprised at the type of comment. Ken is a pot-stirrer in meetings. We expect disagreement in this class about leadership and motivation philosophies and seek to pull these out for discussion topics. However, the racial and sexual comments are not necessary and they bothered me. I think maybe he was trying to be funny. I think the student is credible and that Dr Shultz made the comments.

I spoke with Dr Shultz after Dr Pignatiello made me the instructor of record for LOGM 542. The handover of material was very smooth. At this time Dr Shultz said he was puzzled about why he was in trouble. He said he didn't even know what he was being accused of. He asked who accused him and I said I could not tell him that. I felt like he was trying to fish for information. He also said the students probably knew who complained and they might take it out on her. He felt this was more likely to happen if they were upset about the change of instructor. I'm not sure if he thinks he did anything wrong. He is confident, even borderline cocky, but not self-aware about the impact of his actions on other people.

On 17 January 2017, Dr Pignatiello introduced me to the class and told them I was their new instructor for the rest of the quarter. He did not give a reason for the change and I did not discuss it with the class as a whole. I discussed the transition one-on-one with Capt Thomas Bihansky, the class leader. I did not discuss why I replaced Dr Shultz, but he could read between the lines and knew. Capt Bihansky said the students were not concerned about the change of instructor and no one in the class felt ostracized or isolated by other students. I have not observed any retaliation against any students and they, including Lt Beightel, are vocal and engaged with each other in class. However, Lt Herald has participated in group discussions, but has not offered any input during full class discussions. I am not sure if that is a change from before the incident. Otherwise, there are no weird vibes and nothing in the classroom to indicate problems. I think if Dr Shultz had been left in the classroom then the students would have been uncomfortable thinking "What is he going to say next?" I think the student he approached after class would have been especially uncomfortable. I don't think Ken would have retaliated. He is not vindictive, he just tries to provoke disagreements.

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I declare under penalty of perjury that the foregoing is true and correct. Executed at Wright-Patterson Air Force Base, Ohio, on January 27, 2017.

MATTHEWA DOUGLAS, LI COL, USAF

I declare under penalty that the foregoing is a true and correct summary of the testimony given by the witness. Executed at Wright-Patterson Air Force Base, Ohio, on January 27, 2017.

ANTHONY L. FRANZ, Lt Col, USAF

May 27

Investigating Officer