

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

RICHARD ROE, ET AL.,

PLAINTIFFS,

v.

MARK T. ESPER, ET AL.,

DEFENDANTS.

CIVIL ACTION NO. 1:18-cv-01565

**REPLY IN SUPPORT OF PLAINTIFFS' MOTION
TO MODIFY THE COURT'S SCHEDULING ORDER FOR THE
LIMITED PURPOSE OF TAKING A DEPOSITION OUT OF TIME**

Defendants argue that the Court should deny Plaintiffs' request to depose Colonel Danaher because (1) his testimony is unreasonably cumulative, and (2) Plaintiffs were not diligent in pursuing his deposition. Neither argument has merit.

Col. Danaher is a medical doctor involved in the treatment of Airmen with HIV. Defendants have muzzled him by redacting, and in many cases withholding entirely, at least 40 documents that he wrote, received, or is mentioned in. Those documents were produced between June 3rd and July 1st. By their opposition, Defendants continue their efforts to silence Col. Danaher, and to limit Plaintiffs' discovery in this case.

I. Col. Danaher's Testimony Will Not Be Cumulative

Plaintiffs allege in their complaint that the Air Force "failed to abide by DoD and Air Force regulations in deciding that Roe and Voe should be separated," and that had the regulations been followed "Roe and Voe would have been retained, returned to duty, and allowed to deploy worldwide." Dkt. 1, ¶ 103. The government just produced documents showing that Col. Danaher in-

formed those involved in the Air Force's policy process that the change made in 2015 [REDACTED]
[REDACTED] See (US000040422, Ex. A at 1). Col. Danaher's
statements in this newly produced and unredacted email are on all fours with the complaint:

[REDACTED]

* * * *

[REDACTED]

* * * *

[REDACTED]

* * * *

[REDACTED]

Id. Col. Danaher further explains that [REDACTED]

[REDACTED] *Id.* Numerous other recently produced documents authored
by Col. Danaher are found in Defendants' court-ordered productions and reveal similar content.

See, e.g. (US00040398, Sealed Ex. F to Defs.' Opp. [REDACTED]

[REDACTED]

[REDACTED]; US0040421, Ex. B [REDACTED]

[REDACTED]

[REDACTED])).

Based on these documents, the only way that Col. Danaher's testimony—the testimony of a medical professional who has treated Airmen living with HIV—would be cumulative is if Defendants present a 30(b)(6) witness competent and prepared to make these same admissions under oath. Defendants do not contend that Col. Downes has any medical training and none is apparent. Nor do Defendants contend that she will agree with the medical views expressed by Col. Danaher. The offered 30(b)(6) testimony is not a substitute for Col. Danaher's testimony.

As for Defendants' claim that the deposition will be cumulative of the testimony of Ms. Soper or Dr. Okulicz, there is no indication that (1) they were aware of all these communications or that (2) counsel would have allowed them to answer questions about the redacted documents Defendants provided to Plaintiffs during discovery. Rather, consistent with so many other witnesses, the only reasonable conclusion is that Defendants would have instructed them not to answer questions on redacted portions. *See, e.g.*, (Ciminera Depo., Ex. C at 174:17–25, 175:1–6 (instructing witness not to answer whether a redacted portion of deposition exhibit references HIV); Palumbo Depo., Ex. D at 62:8–25, 63:1–4 (instructing witness not to answer questions about the redacted portions of email)). Defendants' position would have required Plaintiffs to take wasteful depositions. Given the recent productions, Plaintiffs would still be seeking additional testimony from Col. Danaher.

II. Defendants Have Been Diligent; This Motion is Driven by The Newly-Produced Documents

Defendants do not claim that Plaintiffs were not diligent in seeking Col. Danaher's deposition from the time they received the court-ordered productions on June 3, 2019 and July 1, 2019, including dozens of highly relevant documents. Instead, they contend that several redacted documents that mention Colonel Danaher, his name being mentioned in the deposition of Dr. Okulicz,

and Ms. Soper referencing his *office* during her deposition put Plaintiffs “on notice of Colonel Danaher’s involvement.” Defs.’ Opp. at 1. Defendants arguments once again fall flat.

First, even if the documents identified by Defendants show that Plaintiffs knew Dr. Danaher was relevant to this case, they cannot contend that the extent of his involvement in the creation of these policies was apparent. It was not until Defendants produced numerous documents that Colonel Danaher wrote *without redactions* that his views become clear. Had Plaintiffs known about the extent of his involvement and the fact he had been telling other Air Force personnel that the Air Force was violating DoD and Air Force policy by discharging asymptomatic HIV-positive Airmen, Plaintiffs certainly would have taken his deposition. But, Defendants withheld that information from Plaintiffs until the Court ordered Defendants to produce it, well after the close of discovery.

Second, taking Defendants’ argument to its logical conclusion, the only way that Plaintiffs could have been diligent in this circumstance was to depose every person mentioned on the relevant documents. This would have required at least ten or more additional depositions.

It also would have been a waste of time to depose all of the people on these emails. As discussed above, Defendants argument that Plaintiffs should have deposed Col. Danaher during discovery also overlooks Defendants’ claim that the very material to be probed in deposition was privileged. There is no indication they would have permitted Col. Danaher (or anyone else) to testify about it, and as explained above, Defendants’ privilege claims made in other depositions suggest otherwise.

Furthermore, Lieutenant Colonel Okulicz ambiguously remarked that Col. Danaher “*may* have” communicated some information to him but that he “[didn’t] recall when [he] learned that

information, per se.” Ex. H to Defs.’ Opp. That is not an indication that Col. Danaher had authored documents that so squarely reflect the merits of Plaintiffs’ claims in this case.

Finally, that Ms. Soper mentioned Col. Danaher’s *office*—not even his name—and indicated that his office “took part [in] the coordination of the policy memoranda,” was not a clue that Col. Danaher had explained, from a medical standpoint, that the Air Force’s actions could not be squared with the language of its policies.

Conclusion

It is fundamentally unfair to the discovery process to allow Defendants to withhold critical information, produce it after discovery closes, and then attempt to prevent full discovery into that information. Had Defendants provided these documents during discovery, Plaintiffs would have deposed Col. Danaher during the discovery period. Given what Col. Danaher has written in these newly produced and unredacted documents, what he has to say is not cumulative of any other testimony in this case. Nor is the burden of having to participate in his deposition a unique burden; it is no different than if he was deposed during fact discovery. And any additional burden suggested by Defendants due to the proximity of this deposition to trial is of their own making since they just produced the relevant documents.

Plaintiffs therefore request that the deposition of Col. Danaher be permitted to proceed out of time.

Dated: July 11, 2019

/s/ Scott Schoettes

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/s/ John W. H. Harding

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CERTIFICATE OF SERVICE

I certify that, on the 11th day of July, 2019, I caused this document to be filed electronically through the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

Dated: July 11, 2019

Respectfully submitted,

/s/ John W. H. Harding

John W.H. Harding

EXHIBIT A

Downes, Karen M Col USAF SAF-MR (USA)

From: Danaher, Patrick J Col USAF AFMOA (US)
Sent: Tuesday, October 10, 2017 2:04 PM
To: Downes, Karen M Lt Col USAF SAF-MR (US)
Subject: RE: HIV Memo
Attachments: Tab 1 - Retention of Airmen with HIV Memorandum _v2_pjd.docx

Lt Col Downes,

It was great talking with you too--always easier to discuss than type! I am available to discuss further by phone any time: [REDACTED]

V/r,

PJD

PATRICK J. DANAHER, Col, USAF, MC
Chief, Provision of Medical Care Division
Chief Internal Medicine Consultant to the AF Surgeon General
Air Force Medical Operations Agency (AFMOA)
2261 Hughes Avenue, Suite 153
JBSA Lackland, Texas 78236-1025
210-395-9140 commercial

969-9140 DSN

patrick.j.danaher6.mil@mail.mil

-----Original Message-----

From: Downes, Karen M Lt Col USAF SAF-MR (US)

Sent: Tuesday, October 10, 2017 11:50 AM

To: Danaher, Patrick J Col USAF AFMOA (US) <patrick.j.danaher6.mil@mail.mil>

Subject: HIV Memo

Col Danaher,

Great talking with you. Here is the memo.

Thank you.

V/r

Karen

//signed//

KAREN M. DOWNES, Lt Col, USAF

703-697-6429

IMA to Assistant Deputy, Health Policy

Office of the Secretary of the Air Force Assistant Secretary (Reserve
Affairs & Airman Readiness)

5D742

1660 Air Force Pentagon

Washington, DC 20330-1660

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distribution is prohibited. If you are not the intended recipient, please

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message.

EXHIBIT B

Downes, Karen M Col USAF SAF-MR (USA)

From: Danaher, Patrick J Col USAF AFMOA (US)
Sent: Friday, March 16, 2018 10:39 AM
To: Downes, Karen M Lt Col USAF SAF-MR (US)
Cc: Okulicz, Jason F Lt Col USAF USARMY MEDCOM BAMC (US)
Subject: RE: HIV Memo?

V/r,

Pat

PATRICK J. DANAHER, Col, USAF, MC
Chief, Provision of Medical Care Division Air Force Medical Operations Agency (AFMOA)
2261 Hughes Avenue, Suite 153
JBSA Lackland, Texas 78236-1025
210-395-9140 commercial
969-9140 DSN
patrick.j.danaher6.mil@mail.mil

-----Original Message-----

From: Downes, Karen M Lt Col USAF SAF-MR (US)
Sent: Friday, March 16, 2018 9:01 AM
To: Danaher, Patrick J Col USAF AFMOA (US) <patrick.j.danaher6.mil@mail.mil>
Subject: RE: HIV Memo?

Col Danaher,

Thanks
V/r
Karen

//signed//

KAREN M. DOWNES, Lt Col, USAF

703-697-6429

IMA to Assistant Deputy, Health Policy

Office of the Secretary of the Air Force Assistant Secretary (Reserve Affairs & Airman Readiness)

5D742

1660 Air Force Pentagon

Washington, DC 20330-1660

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-----Original Message-----

From: Danaher, Patrick J Col USAF AFMOA (US)

Sent: Thursday, March 15, 2018 2:05 PM

To: Downes, Karen M Lt Col USAF SAF-MR (US) <karen.m.downes2.mil@mail.mil>

Subject: HIV Memo?

Hello Karen--I have not heard any follow-up on this for some time, so wanted to check-in. Do you perchance have any updates?

Thank you,

Pat

PATRICK J. DANAHER, Col, USAF, MC

Chief, Provision of Medical Care Division Air Force Medical Operations Agency (AFMOA)

2261 Hughes Avenue, Suite 153

JBSA Lackland, Texas 78236-1025

210-395-9140 commercial

969-9140 DSN

patrick.j.danaher6.mil@mail.mil

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

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NICHOLAS HARRISON and :
OUTSERVE-SLDN, INC., :
Plaintiffs, :
vs. : No. 1:18-cv-00641
JAMES N. MATTIS, In His : LMB-IDD
Official Capacity As Secretary:
of Defense; MARK ESPER, In His:
Official Capacity As the :
Secretary of the Army; and the:
UNITED STATES DEPARTMENT OF :
DEFENSE, :
Defendants. :

- - - - - x
RICHARD ROE, VICTOR VOE, and :
and OUTSERVE-SLDN, INC., :
Plaintiffs, :
vs. : No. 1:18-cv-01565
JAMES N. MATTIS, In His :
Official Capacity As Secretary:
of Defense; HEATHER A. WILSON, :
In Her Official Capacity as :
Secretary of the AIR FORCE; :
and the UNITED STATES :
DEPARTMENT OF DEFENSE, :
Defendants. :

- - - - - x
VIDEOTAPED 30(b)(6) DEPOSITION OF DEPARTMENT OF
DEFENSE GIVEN BY PAUL CIMINERA

DATE: Tuesday, March 5, 2019
TIME: 9:05 a.m.
LOCATION: Winston & Strawn
1700 K Street, N.W.
Washington, D.C.

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REPORTED BY: Denise M. Brunet, RPR
Reporter/Notary

Veritext Legal Solutions

1 conflicts with other regulations or existing law?

2 A So there may be some ones that I can deal
3 with at my level. And if I concur, then the
4 comment is resolved. We will have to make the
5 change that the requester requested with their
6 non-concur.

7 If it's something I can't address based
8 on, you know, what's within the scope of my
9 abilities or knowledge, then I would seek
10 expertise. And it may be Office of General
11 Counsel if there is conflicting interpretation of
12 statute. Or if there is conflicting
13 interpretation of existing policy, I could reach
14 out to the proponent of that policy and try to
15 understand what the intent was and if they have
16 any additional clarifying information.

17 Q Excellent. Can you look to pages --
18 13909, at the bottom there. And then it continues
19 on through 13910. And the comment then continues
20 on to 13911. And it's all redacted. Can you tell
21 me whether this comment specifically referenced
22 HIV?

23 MS. BERMAN: I'm going to object and
24 instruct the witness not to discuss anything
25 that's been redacted. It's being withheld for

1 privilege, deliberative process privilege, I
2 believe, this one.

3 MR. SCHOETTES: I guess -- what's the
4 objection to just simply identifying whether it
5 references HIV? I don't see how that implicate
6 the deliberative process are privilege.

7 MS. BERMAN: The information itself is
8 redacted, so I wouldn't have the witness testify
9 to what it is, substantively or otherwise. It's
10 being withheld in full, that section. I also
11 don't know if he knows the answer because he
12 didn't review the unredacted version of this
13 document.

14 MR. SCHOETTES: Well, he put together
15 this whole document --

16 MS. BERMAN: He did.

17 MR. SCHOETTES: -- at some point. But, I
18 mean, I guess I'm still -- I'm trying to comply
19 with the court's guidance on trying to narrow the
20 documents that are at issue with respect to
21 deliberative process privilege. And -- I mean,
22 the court has said that he thought the government
23 should have shared some of the -- some of these
24 materials with us in full in order for us to be
25 assess the appropriateness of the privilege. I

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

3	RICHARD ROE, ET AL.,)	
)	
4	Plaintiffs,)	
)	
5	VS.)	CIVIL ACTION NUMBER:
)	1:18-CV-01565
6	PATRICK M. SHANAHAN, ET AL.,)	
)	
7	Defendants.)	

ORAL/VIDEO DEPOSITION OF
GUY PALUMBO
MARCH 20, 2019

ORAL DEPOSITION OF GUY PALUMBO, produced as a witness at the instance of the Plaintiffs, was duly sworn, was taken in the above-styled and numbered cause on the MARCH 20, 2019, from 9:14 a.m. to 12:41 p.m., before Chris Carpenter, CSR, in and for the State of Texas, reported by machine shorthand, at the offices of Hoffman Reporting, 206 E. Locust Street, San Antonio, TX 78212, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

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A P P E A R A N C E S

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sschoettes@lambdalegal.org

FOR THE DEFENDANTS:

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Washington DC 20001
(202) 616-8366
joshua.abbuhl@usdoj.gov

ALSO PRESENT:

Major Gregory Morgan
Steve Lopez, videographer
Chris Carpenter, CSR, RPR

1 INDEX

2 Appearances.....2

3 GUY PALUMBO

4 Examination by Mr. Schoettes.....4

5 Signature and Changes.....104

6 Reporter's Certificate.....106

7 EXHIBITS

8 NO. DESCRIPTION	PAGE MARKED
9 Exhibit 1 Deposition Notice	8
10 Exhibit 2 E-Mail Chain Ending Sept. 21, 2017	45
11 Exhibit 3 E-Mail Chain Ending Sept. 27, 2017	60
12 Exhibit 4 Policy Memo from Gen. Labrutta, Oct. 11, 2017	63
13	
14 Exhibit 5 Policy Memo from Mr. Manasco, June 6, 2018	67
15 Exhibit 6 Policy Memo from Mr. Manasco, Sept. 26, 2018	71
16	
17 Exhibit 7 Asymptomatic HIV Case Summaries (CONFIDENTIAL)	81
18 Exhibit 8 Department of Defense Instruction, Aug. 5, 2014	90
19	
20 Exhibit 9 Air Force Instruction on Immunodeficiencies Virus Program	98
21	
22	
23	
24	
25	

1 shared it with Lieutenant Colonel Downes?

2 A. Yes.

3 MR. SCHOETTES: Do we have that memo?

4 MR. ABBUHL: I don't know. It looks like
5 the e-mail has the attachment.

6 MR. SCHOETTES: I don't think we have the
7 attachment so I'd like to make a request that we get
8 that.

9 MR. ABBUHL: I'll look into it.

10 MR. SCHOETTES: Thanks.

11 Q. (By Mr. Schoettes) Okay. You can set **Exhibit 2**
12 aside.

13 MR. SCHOETTES: I'm going to ask the court
14 reporter to mark this as **Exhibit 3**.

15 (**Exhibit 3** marked for identification.)

16 Q. (By Mr. Schoettes) So to the extent that you
17 can, given the redactions of this document, do you
18 recognize what it is?

19 MR. ABBUHL: Okay, just for the record, as
20 far as I can tell, most all of the substance is
21 redacted.

22 But you may answer to the extent you can.

23 A. No.

24 Q. (By Mr. Schoettes) You -- do you -- do the
25 headers on these e-mails not -- do the headers on these

1 e-mail guide you as to what this document is?

2 A. No.

3 Q. Are you a recipient of or an author of the
4 e-mails compiled in this document?

5 A. It would appear, yes.

6 Q. And are the e-mails from you to and from Martie
7 Soper?

8 A. In part, yes.

9 Q. Are there other individuals -- are there other
10 individuals who are direct recipients and not merely
11 cc'd?

12 A. Are there individuals other than who?

13 Q. Than you and Martie Soper. And actually I'm
14 seeing now on Page US 40256, that a Bruner, A.E. was
15 the -- sent one of these e-mails; is that correct?

16 A. Yes.

17 Q. Who is Bruner, A.E.?

18 A. He is Al Bruner. He works in the office of the
19 Secretary of Defense program management of -- I think
20 more than this program but that -- that is one of -- if
21 is not his main function, is oversight of the disability
22 evaluation system.

23 Q. And actually, it looks like this first e-mail
24 found on Page 4 is an e-mail from you to Al Bruner; is
25 that correct?

1 A. Yes.

2 Q. And the subject of this is HIV Policy Question,
3 correct?

4 A. Yes.

5 Q. And it's marked as high importance; is that
6 right?

7 A. Yes.

8 Q. Do you recall what you asked Mr. Bruner in this
9 e-mail?

10 MR. ABBUHL: Objection --

11 Q. (By Mr. Schoettes) Or what you discussed, what
12 you discussed in this e-mail to Mr. Bruner?

13 MR. ABBUHL: Objection. To the extent
14 this calls for deliberative process, protected
15 information, you should not answer the question. And
16 due to the fact that it is redacted, I'm instructing you
17 not to answer the question.

18 Q. (By Mr. Schoettes) Are you going to follow
19 advice of counsel not to answer this question?

20 A. Absolutely.

21 Q. Is there anything you can share with me
22 regarding the -- what the subject of these e-mails was?

23 MR. ABBUHL: Objection, vague. And also
24 objection, this answer calls for information protected
25 by the deliberative process privilege.

1 And you should not reveal any
2 predecisional deliberations, any contents of
3 predecisional deliberations. But you may answer a yes
4 or no to counsel's question.

5 A. No, I don't recall.

6 Q. (By Mr. Schoettes) So in addition to the fact
7 that is protected by -- that this is allegedly protected
8 by the deliberative process privilege, you do not recall
9 what the discussions of -- contained in these e-mails;
10 is that correct?

11 A. Not a year and a half later, no.

12 Q. You would need to see those -- the portions
13 that are redacted in order to recollect what these
14 e-mails were about?

15 A. Yes.

16 MR. SCHOETTES: I'll just note for the
17 record that we are likely to reopen this deposition once
18 the issue of deliberative process privilege is resolved
19 if it is resolved in plaintiff's favor.

20 MR. ABBUHL: Noted.

21 Q. You can set Exhibit 3 aside.

22 MR. SCHOETTES: I'm going to have the
23 court reporter mark this as Exhibit 4.

24 (Exhibit 4 marked for identification.)

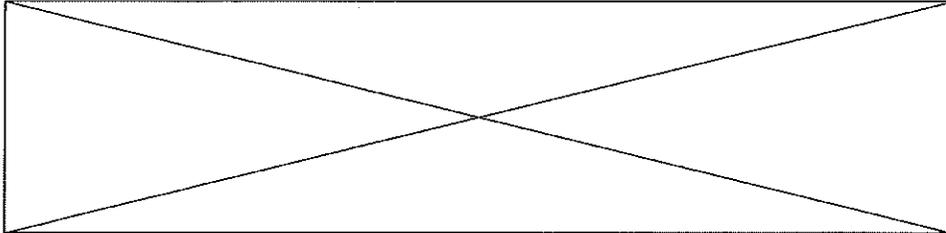
25 Q. (By Mr. Schoettes) Do you recognize Exhibit 4?

From: PALUMBO, GUY M GS-15 USAF AFPC AFPC/DPPD
Sent: Wednesday, September 27, 2017 5:25 PM
To: STEVENS, JIMMY D GS-12 USAF AFPC AFPC/DPF
Subject: FW: HIV policy question (UNCLASSIFIED)

GUY M. PALUMBO, GS-15, DAFC
Chief, USAF Physical Disability Division
Directorate of Airman and Family Care
Phone: (210) 565-5652, DSN: 665-5652
Email: guy.palumbo.1@us.af.mil

-----Original Message-----

From: Soper, Martha P CIV USAF SAF-MR (US)
[mailto:martha.p.soper.civ@mail.mil]
Sent: Wednesday, September 27, 2017 9:03 AM
To: PALUMBO, GUY M GS-15 USAF AFPC AFPC/DPPD <guy.palumbo.1@us.af.mil>
Cc: DOWNES, KAREN M Lt Col USAF HAF U S AIR FORCE HQ/MRR
<karen.downes@us.af.mil>
Subject: RE: HIV policy question (UNCLASSIFIED)



Standing by, thanks,
Martie

Martie Soper, RN, MSHS
Assistant Deputy, Health Policy
Office of the Secretary of the Air Force
Assistant Secretary (Reserve Affairs & Airman Readiness)
SAF/MRR, Rm 5D742, Pentagon
Washington, DC 20330
O: 703-693-9512
C: 404-405-6109

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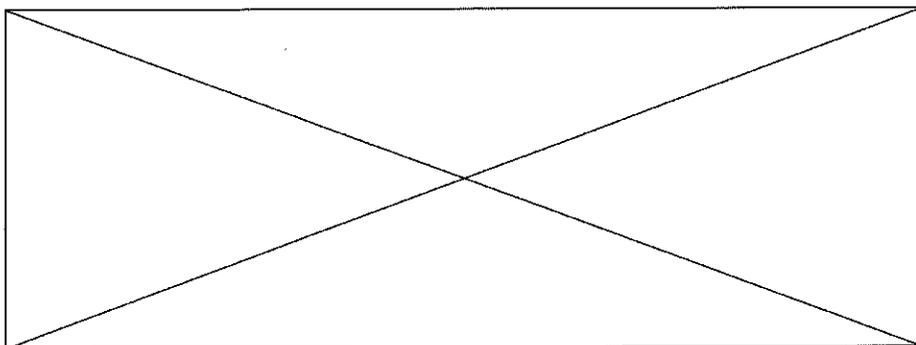


message.

-----Original Message-----

From: PALUMBO, GUY M GS-15 USAF AFPC AFPC/DPFD
[mailto:guy.palumbo.1@us.af.mil]
Sent: Wednesday, September 27, 2017 8:44 AM
To: Soper, Martha P CIV USAF SAF-MR (US) <martha.p.soper.civ@mail.mil>
Cc: Downes, Karen M Lt Col USAF SAF-MR (US) <karen.m.downes2.mil@mail.mil>
Subject: RE: HIV policy question (UNCLASSIFIED)

Martie,



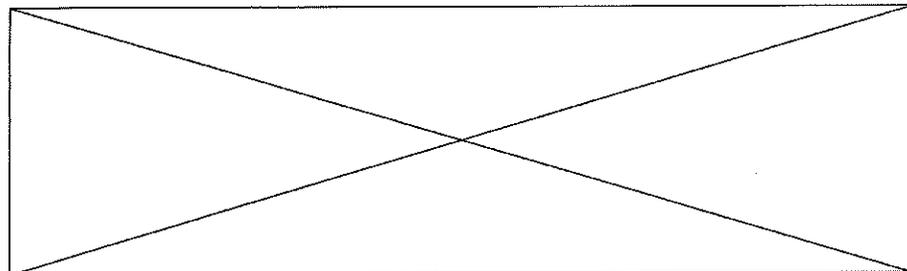
Guy

GUY M. PALUMBO, GS-15, DAFC
Chief, USAF Physical Disability Division
Directorate of Airman and Family Care
Phone: (210) 565-5652; DSN: 665-5652
Email: guy.palumbo.1@us.af.mil

-----Original Message-----

From: Soper, Martha P CIV USAF SAF-MR (US)
[mailto:martha.p.soper.civ@mail.mil]
Sent: Wednesday, September 27, 2017 7:27 AM
To: PALUMBO, GUY M GS-15 USAF AFPC AFPC/DPFD <guy.palumbo.1@us.af.mil>
Cc: DOWNES, KAREN M Lt Col USAF HAF U S AIR FORCE HQ/MRR
<karen.downes@us.af.mil>
Subject: FW: HIV policy question (UNCLASSIFIED)

Guy,



Let me know when you have availability to discuss this.

Martie

Martie Soper, RN, MSHS
Assistant Deputy, Health Policy
Office of the Secretary of the Air Force
Assistant Secretary (Reserve Affairs & Airman Readiness)
SAF/MRR, Rm 5D742, Pentagon
Washington, DC 20330
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-----Original Message-----

From: Bruner, A E (AI) CIV OSD HA (US)
Sent: Tuesday, September 26, 2017 4:28 PM
To: Soper, Martha P CIV USAF SAF-MR (US) <martha.p.soper.civ@mail.mil>;
Downes, Karen M Lt Col USAF SAF-MR (US) <karen.m.downes2.mil@mail.mil>
Subject: FW: HIV policy question (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

FYSA....

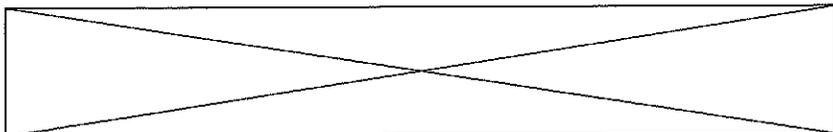
-----Original Message-----

From: Bruner, A E (AI) CIV OSD HA (US)
Sent: Tuesday, September 26, 2017 4:27 PM
To: 'PALUMBO, GUY M GS-15 USAF AFPC AFPC/DPFD' <guy.palumbo.1@us.af.mil>
Cc: Findley, Andrew L Jr CIV (US) <andrew.l.findley.civ@mail.mil>; Melillo,
Michael R CIV OSD OUSD P-R (US) <michael.r.melillo4.civ@mail.mil>; Adirim,
Terry A SES OSD HA (US) (terry.a.adirim.civ@mail.mil)
<terry.a.adirim.civ@mail.mil>; Stevens, Bret CIV OSD OUSD P-R (US)
(bret.stevens1.civ@mail.mil) <bret.stevens1.civ@mail.mil>; Berry, Priscilla
A CIV DHA (US) (priscilla.a.berry2.civ@mail.mil)
<priscilla.a.berry2.civ@mail.mil>
Subject: RE: HIV policy question (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Guy





VR---al

-----Original Message-----

From: PALUMBO, GUY M GS-15 USAF AFPC AFPC/DPFD

[mailto:guy.palumbo.1@us.af.mil]

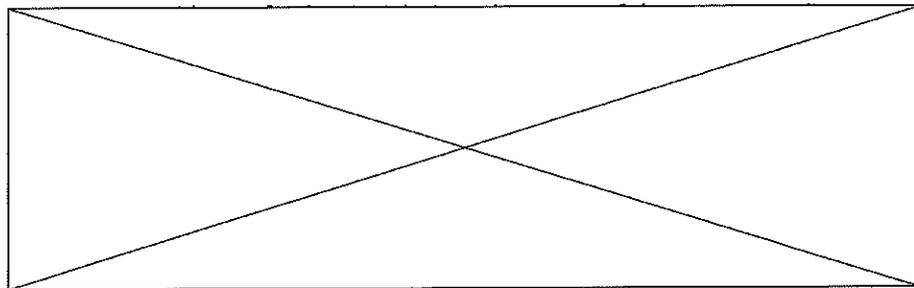
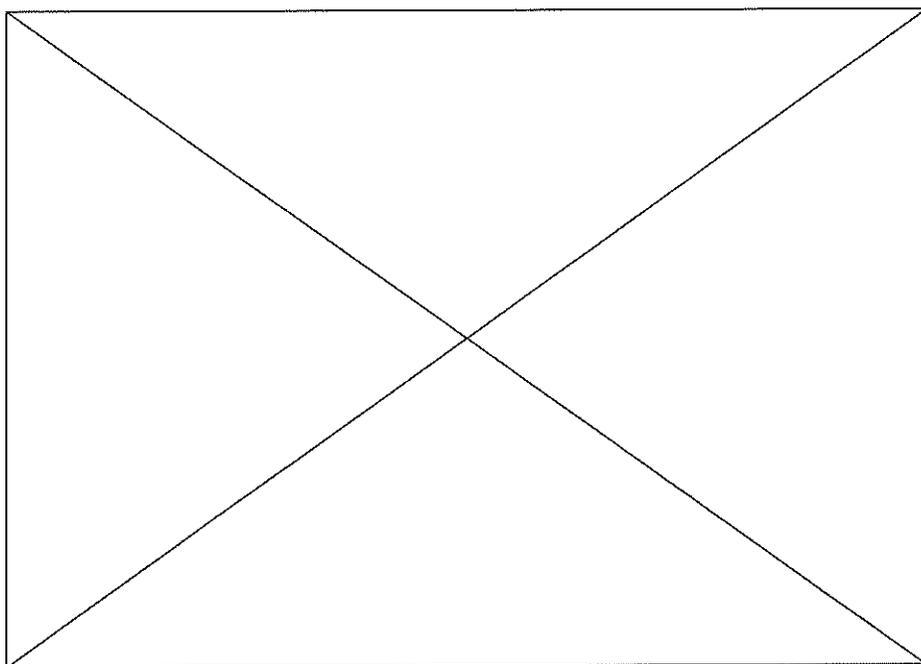
Sent: Tuesday, September 26, 2017 4:12 PM

To: Bruner, A E (AI) CIV OSD HA (US) <alfred.e.bruner.civ@mail.mil>

Subject: HIV policy question

Importance: High

Al,



Guy

GUY M. PALUMBO, GS-15, DAFC
Chief, USAF Physical Disability Division
Directorate of Airman and Family Care
Phone: (210) 565-5652; DSN: 665-5652
Email: guy.palumbo.1@us.af.mil

CLASSIFICATION: UNCLASSIFIED
CLASSIFICATION: UNCLASSIFIED