

## Exhibit D

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

WHEATON COLLEGE

*Plaintiff,*

v.

KATHLEEN SEBELIUS, Secretary  
of the United States Department of  
Health and Human Services, UNITED  
STATES DEPARTMENT  
OF HEALTH AND HUMAN  
SERVICES, HILDA SOLIS, Secretary of  
the United States Department of Labor,  
UNITED STATES DEPARTMENT OF  
LABOR, TIMOTHY GEITHNER,  
Secretary of the United States Department  
of the Treasury, and UNITED STATES  
DEPARTMENT OF THE TREASURY,

*Defendants.*

Civ. Action No. 1:12-cv-01169-ESH

**DECLARATION OF  
HEIDI M. DANIELS**

Eric N. Kniffin (DC Bar No. 999473)  
S. Kyle Duncan (LA Bar No. 25038)  
(*pro hac vice* application to be filed)  
Mark Rienzi (DC Bar No. 494336)  
Lori Halstead Windham (DC Bar No. 501838)  
The Becket Fund for Religious Liberty  
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Suite 220  
Washington, DC 20007  
(202) 955-0095  
(202) 955-0090  
ekniffin@becketfund.org

*Counsel for Plaintiff*

**DECLARATION OF HEIDI M. DANIELS**

1. My name is Heidi M. Daniels. I am over the age of 18 and have personal knowledge of the contents of this declaration.

2. I am the Assistant Director of Human Resources at Wheaton College. I have worked there for 13 years. During that time, I have relied upon Wheaton's health insurance.

3. My husband, Raashon Daniels, is the Multicultural Admissions Counselor at Wheaton College. He has worked at the College for 8 years.

4. I have chosen to participate in Wheaton's Blue Advantage HMO plan. My husband and I have chosen this plan over Wheaton's PPO plan because it is less expensive than the PPO plan.

5. My husband and I have two daughters under the age of two. Our entire family relies upon Wheaton's health insurance.

6. Because my husband also works for Wheaton College, Wheaton's offerings are the only affordable option for our family.

7. Our young children go to our pediatrician for regular checkups and immunizations, and we rely on Wheaton's health insurance to help pay for this care.

8. Additionally, earlier this year our oldest daughter suffered severe burns across her chest. Through Wheaton's insurance, we have been fortunate to receive care through the excellent burn specialists at Loyola Medical Center in Chicago. My daughter's doctors have recommended a two-year course of treatment to make sure her burns heal well, to monitor her compression garment, and to make sure that any scarring is minimized.

9. I do not know how we would afford this care without Wheaton's health insurance.


10. Because of the government's mandate, I am deeply worried about what will happen with Wheaton's insurance plans. If Wheaton stops covering health insurance, I don't know how my husband and I will provide for our daughters' medical needs. We want very much to continue serving the community at Wheaton, but this mandate might make that impossible.

11. As the Assistant Director of Human Resources at Wheaton, I am aware of many employees who are in a much worse situation than my family. Many employees are suffering from life-threatening, long-term health conditions. It pains me that I am not able to assure them that Wheaton College will be able to continue to offer employee health care next year.

12. As the Assistant Director of Human Resources, I am familiar with Wheaton's employee health insurance plans. One reason that many employees choose the HMO plans is the low cost for hospital visits, even at Chicago's research hospitals. Employees on the HMO plans have significantly lower out-of-pocket expenses and a low, flat-rate co-pay for hospital visits. Employees on the PPO plan have a high deductible and must pay 20-40% of the remaining hospital bill. The employee costs for emergency room visits, outpatient testing, and outpatient surgeries are also substantially higher on the PPO plan. If Wheaton employees had to switch from the HMO plans to the PPO plan, they would end up spending substantially more out of pocket for their medical care.

13. My husband and I share Wheaton's religious convictions and we support the College in this lawsuit. I can only hope that the result will allow Wheaton to continue to provide our family, and all Wheaton employees, with health insurance.

Date: 8.1.12

  
Heidi M. Daniels