

Exhibit C

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
STANTON L. JONES**

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)
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Counsel for Plaintiff

DECLARATION OF STANTON L. JONES

1. My name is Dr. Stanton L. Jones. I am 58 years old and have personal knowledge of the contents of this declaration.

2. I serve as the Provost at Wheaton College. I have worked at the College for 31 years. During that time, my family has relied exclusively upon Wheaton's health insurance.

3. My wife and I have chosen to participate in Wheaton's PPO plan.

4. My wife volunteers her time in our church and our community. None of her commitments provide our family with an affordable alternative to Wheaton's employee health insurance options.

5. The HHS Mandate, which I understand will begin to affect Wheaton College next January, could not have come at a worse time for my family. Although for most of my life I have been in excellent health, over the past three years I have been diagnosed with two serious health conditions: Parkinson's disease and prostate cancer.

6. I was diagnosed with Parkinson's disease two and half years ago, after I noticed a tremor in my left hand. My tremors have now spread to my left leg.

7. Additionally, five months ago I was diagnosed with prostate cancer.

8. My wife and I have just finished our first round of consultations regarding treatment of the prostate cancer. Determining a course of treatment has been very complicated due to potential interactions between my two diseases and their respective treatments.

9. Shortly before Wheaton College announced that the Mandate might prevent it from offering employee health care insurance next year, my wife and I had decided together with my

doctors to delay treatment for my prostate cancer and monitor the progression of my Parkinson's disease.

10. The HHS Mandate's projected impact on Wheaton College's health insurance offerings has now called this decision into question, and is requiring my wife and me to face some terrible choices.

11. If I go against my doctors' advice and seek treatment for my prostate cancer before Wheaton College's plan year ends, my doctors will have to decide on a course of treatment without knowing how my Parkinson's will progress. Doing so, I am told, risks leaving me with lifetime incontinence.

12. On the other hand, if I follow my doctors' advice and wait, but discover next year that I must have prompt surgery to stop my cancer from spreading, I may have to undergo surgery without any health insurance. Such a scenario would be financially devastating.

13. As a longtime Wheaton employee, I share Wheaton's religious convictions and I support the College in this lawsuit. I can only hope that the result will allow Wheaton to continue providing me with health insurance.

Date: 7/31/2012



Dr. Stanton L. Jones