

## Exhibit F

**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 TONY DAWSON**

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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*Counsel for Plaintiff*

**DECLARATION OF TONY DAWSON**

1. My name is Tony Dawson. I am over the age of 18 and have personal knowledge of the contents of this declaration.

2. I am the Director of Auxiliary Services at Wheaton College. I have worked here for 27 years. During that time, my family and I have relied upon Wheaton's health insurance.

3. My wife, Anna Dawson, also works at Wheaton College. She serves as the Visit and Office Coordinator for the Graduate Admissions Office.

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

5. My wife and I have four children, three of which are dependants covered under Wheaton's health insurance.

6. Because Anna also works for Wheaton College, Wheaton's health insurance offerings are the only affordable option for our family.

7. My wife Anna suffers from three ruptured vertebrae. This degenerative neurological condition requires regular monitoring, and we rely on Wheaton's health insurance to help pay for our neurologist's care.

8. Because of Anna's condition, she suffers from insomnia, chronic pain, tingling sensations, and severe headaches. Anna is able to work and function reasonably well because she regularly takes prescription pain medication. I do not know how we would pay for these drugs without Wheaton's health insurance.

9. I understand from our neurologist that my wife's condition is degenerative, and may worsen dramatically should her nerve bundle be restricted. Should this happen, I understand that her pain would become very intense, to the point that she might become incapacitated.


10. If my wife's condition should worsen after the HHS Mandate begins to impact Wheaton's health insurance, I am terribly concerned that I would not be able to pay for my wife's pain medications or necessary surgery. I also do not know how I would care for my wife should she become incapacitated with pain.

11. I do not know whether Anna would be able to continue to see her specialists if the HHS Mandate prevents Wheaton College from being able to offer our health care plan next year.

12. 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 do not know how my wife and I will provide for our family's medical needs. We want very much to continue to serve the community at Wheaton, but this mandate might make that impossible.

13. My wife 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 with health insurance.

Date: 8/1/2012

  
Tony Dawson