

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CITY OF COLUMBUS, et al.,

Plaintiffs,

v.

No. 18-cv-2364-DKC

DONALD J. TRUMP, in his official capacity
as President of the United States of
America, et al.,

Defendants.

DECLARATION OF STEVE VONDRA

I, Steve Vondra, declare under penalty of perjury as prescribed in 28 U.S.C. § 1746:

1. The facts contained in this declaration are known personally to me and, if called as a witness, I could and would testify competently thereto under oath. I submit this sworn declaration in support of Plaintiffs' motion for summary judgment.

2. At the time the Complaint and the Amended Complaint were filed, I resided in Charlottesville, Virginia, with my wife, Bonnie Morgan.

3. For the last four years, we have purchased our health insurance on Virginia's Affordable Care Act Exchange. However, we do not receive subsidized coverage through advance premium tax credits under the Act.

4. I believe that we have been forced to pay higher premiums for lower-quality insurance because of Defendants' actions.

5. I have a preexisting condition. Before the ACA, our health insurance situation was precarious: I had not had health insurance since 2005, when I closed my business. I was unable to purchase insurance because, at the time, insurers were able to discriminate against

individuals on the basis of their health history and health status. While Bonnie had insurance through her work, I was ineligible, as we were not married at the time.

6. After the ACA prohibited discrimination on the basis of preexisting conditions, we were finally able to purchase insurance on the individual exchange. For 2016, we purchased a Bronze plan with a premium of around \$1,050 a month for the two of us. We subsequently upgraded our coverage for 2017 to a Silver plan with a premium of around \$1,270 a month.

7. For 2018, we returned to a Bronze plan, sold by Optima. However, the monthly premium rose to a staggering \$3327.65 for the two of us—a 261 percent increase above what we paid for a Silver plan in 2017. Moreover, the plan’s annual deductible, around \$14,400, was also significantly higher than the deductible for the plans we purchased in 2016 and 2017. Combining a year’s worth of premiums and the annual deductible, we would have had to spend nearly \$55,000 before receiving any benefit from our insurance.

8. For 2019, we enrolled in a Bronze plan, sold by Anthem. That plan continued to have a high monthly premium of \$1,899.49 for the two of us, and a \$13,000 deductible. While the plan is cheaper than the plan we purchased in 2018, it remains significantly more expensive than the plans we had in 2017 and 2016. Combining a year’s worth of premiums and the annual deductible, we would still have to spend nearly \$35,794 before receiving any benefit.

9. For 2020, we again enrolled in a Bronze plan, sold by Optima. That plan continued to have a high monthly premium of \$1576.71 for the two of us—higher than the plans we purchased in 2016 and 2017—and a slightly higher deductible of \$13,400. Combining a year’s worth of premiums and the annual deductible, we would still have to spend around \$32,320 before receiving any benefit.

10. On July 20, 2020, Bonnie and I moved to Corvallis, Oregon.


11. After moving to Oregon, we applied to purchase a new plan on Oregon's ACA Exchange. Specifically, we selected a Bronze plan sold by PacificSource Health Plans, with a monthly premium of \$1,608 for the two of us. That plan also has a deductible of \$13,500. Combining a year's worth of premiums and the annual deductible, we would still have to spend around \$32,796 before receiving any benefit.

12. For 2021, we intend to continue purchasing our insurance on Oregon's ACA Exchange.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 12, 2020

Corvallis, Oregon


Steve Vondra