

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

AIMEE MADDONNA,

Plaintiff,

v.

U.S. DEPARTMENT OF HEALTH AND
HUMAN SERVICES, *et al.*

Defendants.

Civil Docket No. 6:19-cv-448-TMC

PLAINTIFF’S RESPONSE TO THE COURT’S NOVEMBER 6, 2019 ORDER

On November 6, 2019, by text order (ECF No. 65), the Court directed Plaintiff Aimee Maddonna to answer its interrogatory regarding the allegations in paragraphs 35–40 of the Complaint (ECF No. 1 at 8–9). Plaintiff submits the attached Declaration in response.

Greenville, South Carolina
November 12, 2019

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DECLARATION OF PLAINTIFF AIMEE MADDONNA

I, Aimee Maddonna, declare as follows:

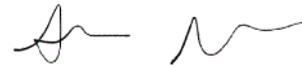
1. I am the plaintiff in this case.
2. In September or October 2014, I began communicating with a representative of Miracle Hill Ministries about the opportunity to volunteer with foster children. We corresponded over the course of the next few weeks, into November 2014.
3. During this period, I told my children about the exciting opportunities that they could have to provide love and care to children in foster care, and my family planned activities that we could do with foster children.
4. In November 2014, in the course of our correspondence, the Miracle Hill representative asked me to provide the name of my church, which I did, giving the name of my Catholic parish.
5. The following day, the representative informed me that my family and I were no longer welcome to volunteer because Miracle Hill would not accept Catholics as volunteer mentors. The representative expressed disappointment because, but for our Catholic faith, we were a great fit with the program.

6. In December 2014, a different representative of Miracle Hill informed me that only Christians who attended the right type of Protestant church were permitted to volunteer and work with the children that the South Carolina Department of Social Services had placed in Miracle Hill's care.

7. In February 2019, I reached out to Miracle Hill for a second time, asking that my family be accepted as volunteers.

8. Later that same month, I was again turned away by Miracle Hill. A Miracle Hill representative informed me that volunteer mentors who work with the foster children placed in Miracle Hill's care by DSS must share Miracle Hill's Protestant beliefs and agree to its Protestant statement of faith.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on November 11, 2019, in the State of South Carolina.



Aimee Maddonna