

Maddonna v. U.S. Dept. of Health and Human Servs., et al.
Civil Action No. 6:19-cv-03551-JD

Exhibit V

**to Governor Henry McMaster's and Michael Leach's Motion for Summary Judgment and
Memorandum in Support Thereof**

Excerpts from Deposition of Aimee Maddonna

Aimee Maddonna

February 14, 2022

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

AIMEE MADDONNA,
Plaintiff,
vs. CIVIL ACTION NO. 6:19-cv-03551-JD
UNITED STATES DEPARTMENT OF HEALTH AND
HUMAN SERVICES, ET AL.,
Defendants.

VIDEO TELECONFERENCE

DEPOSITION OF: AIMEE MADDONNA
DATE: February 14, 2022
TIME: 9:12 A.M.

LOCATION: Residence of Aimee Maddonna
208 Dante Lane
Simpsonville, SC

TAKEN BY: Counsel for the Defendants Governor
Henry McMaster and Director Michael
Leach

REPORTED BY: LORI S. MORTGE,
Certified Court
Reporter, CCR

1 had gotten older and everything else, and I wanted
2 to see if their policy had changed.

3 Q. Did you reach out to Miracle Hill again,
4 in early 2019, after you had talked to your lawyers
5 or before you had talked to them?

6 A. It was before I filed the lawsuit
7 because if they -- if the policy had changed then
8 there was no reason to continue. And, like I said,
9 my -- our family's circumstances had changed and our
10 kids had gotten older and...

11 Q. So the question I asked was a little bit
12 different than that. It was, did you reach out to
13 Miracle Hill, in early 2019, before you had made
14 contact with your lawyers or after you had made
15 contact with your lawyers?

16 A. It was after I made contact with my
17 lawyers but prior to filing any lawsuits.

18 Q. So am I correct in understanding the
19 sequence of events were at some point in early 2019
20 you were talking to Lydia and she suggested that you
21 could contact Americans United for Separation, and
22 after that you contacted them, and then after that
23 you reached out to Miracle Hill to ask if their
24 policy was the same as it had been in 2014? Is that
25 the right sequence?

1 A. Well, I believe I contacted them to ask
2 if I was able -- if their policy was still that only
3 evangelical Christians could apply or people who
4 agree with their statement of faith could apply.

5 Q. Okay. But the sequence of events that
6 you talked to Lydia, then you talked to your
7 lawyers, and then you reached out to Miracle Hill?
8 That is the right order of events?

9 A. I don't super recall what exactly the
10 order of events was. Everything happened pretty
11 quickly there.

12 Q. Did you --

13 A. I...

14 Q. I'm sorry. Go ahead.

15 A. No, you're fine. You're fine. I'm just
16 trying to think through my sequence of events. That
17 sounds about right. I think, yeah. If I had made
18 contact with my attorn -- if I had made contact with
19 my attorneys prior to that -- I don't think I had
20 made much contact with my attorneys prior to that.
21 And I had not filed anything yet.

22 Q. Tell me a little bit about when you
23 first had contact with Miracle Hill. When was that?

24 A. 2014, I believe.

25 Q. Okay. And --

1 A. I think, yeah.

2 Q. And what prompted you to -- how did you
3 get connected to Miracle Hill? How did you begin
4 talking to them in 2014?

5 A. Somebody had posted -- somebody
6 affiliated with them had -- they were asking for
7 volunteers for a mentorship program that Miracle
8 Hill was going to be running for their foster
9 children. And that was -- it was something like the
10 perfect opportunity for us.

11 Q. And you at that time talked to or
12 exchanged e-mails with Miracle Hill and then learned
13 that at that time they only worked with Protestants;
14 is that right?

15 A. Yes.

16 Q. Okay.

17 A. I made the contact with the woman who
18 was asking for -- who is, you know, talking about
19 the program and subsequently with Miracle Hill, yes.

20 Q. And did they tell you that there were
21 other opportunities with other child placing
22 agencies to foster -- or, excuse me, to volunteer
23 with foster children?

24 A. After stating all of the ways in which I
25 was unacceptable, they suggested the name of one

1 other group that they said they had close ties with.

2 Q. And you say all of the ways that you
3 were unacceptable, what were all of those ways?

4 A. They just listed, you know, the ways in
5 which Catholics are not considered suitable. And
6 then they suggested another group that didn't have
7 quite the same policies that they worked closely
8 with.

9 Q. So the one way -- the one reason that in
10 2014 Miracle Hill said they weren't going to be a
11 good fit for you to volunteer was because you were
12 Roman Catholic and they only worked with Protestant
13 foster parents and foster volunteers; is that right?

14 A. Yes.

15 Q. And did you ever reach out to the group
16 that coordinated with them and with other CPAs for
17 foster volunteers?

18 A. No, I was not comfortable doing so.

19 Q. Why not?

20 A. Because I was not comfortable contacting
21 or being associated with a group that had close ties
22 with a group that had just told me that I was
23 unsuitable because -- who said, you know, according
24 to the e-mail, that I just sounded perfect except
25 that I'm Catholic. And I was not comfortable going

1 with a group that was closely affiliated with that
2 group. I was not comfortable going with anybody at
3 that point who had ties with them.

4 Q. And when you say them, you mean with
5 Miracle Hill?

6 A. With anybody who thought that I was
7 unsuitable because I'm Catholic.

8 Q. Did you know that this other group --
9 was it called Fostering Great Ideas?

10 A. I believe so.

11 Q. Did you know that they worked with lots
12 of other child placing agencies as well?

13 A. At that time and at this time that's not
14 really -- that they have worked with other child
15 placing agencies in the past is not my primary
16 concern with regard to working with them. Miracle
17 Hill has worked with lots of agencies, too, that --
18 to the best of my knowledge, but that didn't work
19 out.

20 Q. I guess what I'm trying to understand is
21 if you knew that Fostering Great Ideas provided or
22 coordinated foster care volunteers and mentors to
23 many different child placing agencies, you weren't
24 willing to work with other groups that were happy to
25 work with you just because --

1 A. I have --

2 Q. -- they happened to be in association
3 with Miracle Hill?

4 MR. UPTON: Object to the form.

5 THE WITNESS: I have no assurances that
6 any of those other agencies, like Fostering for
7 Great Ideas, okay, I have no assurances. Obviously
8 I realized, after working with Miracle Hill, I have
9 zero assurances that these other agencies aren't
10 going to do the same thing. That they have worked
11 with other people in the past isn't really the point
12 or it's not really helpful. Miracle Hill has worked
13 with a lot of people in the past.

14 BY MR. COLEMAN:

15 Q. So do you think it will never, under any
16 circumstance, ever be possible for you to volunteer
17 with any foster children anywhere because you once
18 were declined from Miracle Hill?

19 A. If there were policies in place that
20 prevented children who are wards of the State
21 from -- if there were policies in place that stopped
22 places like this from discriminating against people
23 for anything other than their actual ability to
24 mentor or foster, then I would feel much more
25 assured. But until that point I have no assurances

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1 that these places aren't going to do the same thing
2 because there are no -- there's nothing saying that
3 they can't.

4 Q. Is it your position today that you don't
5 know of any child placing agency in the state who
6 would work with a Roman Catholic foster volunteer?

7 A. I am not sure. I'm -- I'm -- I'm aware
8 that there are other child placement agencies now,
9 but I have no clue who they work with -- and it's
10 not just Catholic. I have no clue who they will and
11 won't work with. And the fact that I don't know who
12 they will and won't work with, that makes me
13 hesitant to try again.

14 I had no idea that Miracle Hill
15 wouldn't work with me, and Miracle Hill is one of
16 the biggest -- certainly the most advertised, most
17 vocal.

18 Q. And I guess I just want to make sure I
19 understand. Are you aware that there are child
20 placing agencies and volunteering opportunities in
21 the Upstate of South Carolina that are open to
22 people of any faith or of no faith?

23 A. My understanding that most of the child
24 placing agencies are contracting me -- and that may
25 be the wrong phrase. There are private agencies

1 with their own criteria to be met, so that's -- I
2 mean, in my mind that can go either way. I have no
3 assurances that their criteria will, again, be
4 something that I can't meet.

5 Q. Is it your understanding that there are
6 no volunteering opportunities with foster children
7 open to people of any faith or of no faith?

8 A. It's my understanding that there are
9 no opportunities such as that with the assurance
10 that -- it's my understanding that there are not
11 really any opportunities like that that are -- not
12 through a private agency.

13 Q. Do you remember getting an e-mail from
14 another child placing agency reaching out to you
15 saying that they would welcome you to work with or
16 volunteer with them?

17 A. An e-mail?

18 Q. Mm-hmm.

19 A. I don't recall. And that doesn't --
20 that doesn't mean much, but if that was an e-mail
21 I'm not super super always on top of my e-mail
22 but...

23 Q. Give me just a moment here.

24 A. Yeah.

25 Q. (Reading.) Am I right in understanding

1 that your testimony is that because in 2014 Miracle
2 Hill had referred you to other opportunities --

3 A. I believe they only referred me to one.

4 Q. But am I correct in understanding that
5 it's your testimony that because in 2014 Miracle
6 Hill had referred you to other opportunities that
7 that uncertainty caused you, for the next five
8 years, not to inquire or reach out or seek any other
9 opportunities to work with foster children?

10 A. At that point in our lives their
11 mentorship program, that's -- if you recall when you
12 asked, you know, that question earlier, their
13 mentorship program was what really caught me. That
14 opportunity would have allowed us at that point in
15 our lives to get our feet wet, so to speak, and to
16 be able to begin that process.

17 To the best of my knowledge, that was a
18 completely unique opportunity and -- and they never
19 mentioned in that e-mail, when they referred me to
20 that other child placement agency, I do not believe
21 that there was anything comparable to that really at
22 that time. And that was not a -- that was a
23 thoroughly unique opportunity that I was aware of.
24 I had never heard of anything like that.

25 Q. And is it fair to say that your

1 understanding that there wasn't anything else like
2 it maybe was due to the fact that you didn't reach
3 out to any of the other avenues to see what their
4 opportunities were?

5 A. You keep saying any other avenues, but
6 they only referred me out to the one and I was not
7 comfortable using anybody affiliated with Miracle
8 Hill when Miracle Hill had said that I didn't meet
9 their criteria. I didn't know that there had been,
10 you know, the super specific criteria going into
11 Miracle Hill either, and that was quite a process to
12 go through only to be told that it sounded perfect
13 except. So taking the referral from Miracle Hill
14 was not really something that I was comfortable
15 with.

16 Q. If that fear of rejection was so great
17 that you wouldn't even pursue an alternative that
18 Miracle Hill suggested why, then, in 2019 would you
19 go right back to the same place that already
20 referred you elsewhere? Why did you go back to
21 Miracle Hill?

22 A. Miracle Hill is one of the -- that's the
23 name in every household with regard to anything to
24 do with children, anything to do with -- anything to
25 do with anything. Might there be other agencies I'm

1 sure, but they are certainly the ones that seem to
2 have the most opportunities. They are certainly --
3 they're absolutely the most well-known in the area.

4 Q. If it turned out that in 2014, and again
5 in 2019, there were other comparable volunteering
6 opportunities with other organizations, then you
7 weren't harmed by not being able to do it with
8 Miracle Hill when you could have done it with
9 another organization; right?

10 A. I --

11 MR. UPTON: I object to the form of the
12 question. You can answer it, Aimee.

13 THE WITNESS: Can you ask it again? I'm
14 sorry.

15 BY MR. COLEMAN:

16 Q. Sure. If it turns out that both in 2014
17 and 2019 there were other comparable volunteering
18 opportunities with other child placement agencies,
19 then you weren't harmed by not being able to go with
20 Miracle Hill when you could have done it with
21 another agency; right?

22 A. I was harmed. The children were harmed.
23 Just because I wasn't -- just because I guess I
24 could have tried to scout out other opportunities
25 that I'm not aware of existed, that doesn't mean

1 that I wasn't harmed in the process. Being told
2 that I'm perfect in -- that I sound perfect for
3 opportunity in every way and going through the
4 motions of -- of planning for that, of looking
5 forward to that, of feeling like I have the
6 opportunity to do something that my -- that I always
7 wanted to do and then being told that I can't do
8 that because of my -- because of the parish I belong
9 to, I can't imagine that that's not harmful.

10 Q. Did you ever apply to Miracle Hill or
11 any other CPA or DSS or inquire with them about
12 becoming a foster parent, or was your communication
13 with Miracle Hill and others -- did it have to do
14 with volunteering as a mentor to foster children?

15 A. It was to become -- it was to start the
16 process of becoming a mentor with the intention to
17 move into that area. Like I said, we have -- we
18 have special needs kids and being able to get our
19 feet wet, you know, first with just me and then, you
20 know, as a family thing would have made all the
21 difference in the world to build relationships and
22 to get our feet in the door, so to speak.

23 Q. Excuse me.

24 A. You're fine. I'm with you.

25 Q. So you had inquired with Miracle Hill

1 A. Okay.

2 Q. So take a look at that and let me know
3 when I need to scroll down and let me know when
4 you've had a chance to look over it and see what
5 this is.

6 A. (Reading.) Okay.

7 Q. Do you want me to scroll down at all?

8 A. Is there more to the e-mail? Yeah.

9 Q. Let me scroll down -- (scrolling.)

10 A. Yeah, I think that's where -- (reading.)
11 Okay.

12 Q. All right. Then I'll go down a little
13 bit more and I think that will be -- well...

14 A. Mm-hmm.

15 Q. Let me know when you are through with
16 that.

17 A. (Reading.) All right.

18 Q. (Scrolling.)

19 A. (Reading.) Okay. Is there more of it?

20 Q. I think that's the bottom of it.
21 (Scrolling.)

22 A. (Reading.) Okay.

23 Q. Okay. So let me start by asking, have
24 you seen this e-mail before?

25 A. I believe so.

1 Q. Okay. I'm going to scroll back up to
2 the top of it. (Scrolling.) Okay. And do you
3 remember when or where you would have seen it?

4 A. In my e-mail. I mean, like you said
5 when and -- when and where. I mean, it would have
6 been in my e-mail it looks like in 2019, so probably
7 right after I reached out to them.

8 Q. Okay. So was this the response that you
9 got back from Miracle Hill when you had asked them
10 in 2019 if they still had the same policy of working
11 only with Protestant volunteers for foster children?

12 A. I believe so.

13 Q. Okay. We're back up at the -- at the
14 top of that e-mail. Let me direct your attention to
15 this first paragraph here and the second sentence.
16 It said: We appreciate your desire to volunteer to
17 serve those in need and Miracle Hill Ministries has
18 an abundance of opportunities for you to serve.

19 And then it goes on and --

20 A. Mm-hmm.

21 Q. -- describes generally what some of
22 those opportunities are. Did I read that
23 accurately?

24 A. You did.

25 Q. And then I'm going to scroll back down

1 to the bottom again and draw your attention to this
2 final paragraph here. It says: Thanks so much for
3 your desire to serve Christ by caring for children
4 and those in need. There are many great volunteer
5 roles we would love for you to fill with Miracle
6 Hill.

7 And then a final sentence to that
8 paragraph: May God use you greatly in the lives of
9 the needy you serve.

10 Did I read that correctly?

11 A. Yes.

12 Q. It's fair to say, isn't it, that
13 literally from the first paragraph to the last in
14 its e-mail Miracle Hill expressed an appreciation
15 for your desire to volunteer, they recognize and
16 affirm your willingness and your fitness to
17 volunteer with Miracle Hill and propose almost a
18 dozen different ways that you could volunteer in
19 different capacities?

20 A. As long as it's not directly with
21 children and fostering.

22 Q. Well, hold on. Let's go up a little
23 bit. Do you see the list of bullet points --

24 A. I do.

25 Q. -- at the bottom of this page? So the

1 second one there, Children's Home, ages 7 to 21,
2 that's an opportunity to work with foster children,
3 isn't it?

4 A. I'm sorry. I should have clarified.
5 Mentoring foster children is -- and as you see with
6 the bullet point, foster care administrative work
7 only.

8 Q. Right. But it also lists volunteering
9 at the Children's Home; right?

10 A. At the Children's Home which is not, to
11 the best of my knowledge, you think as mentoring and
12 building specific relationships with the children.

13 Q. Or a little bit further down in the list
14 it mentions volunteering with boys who are in the
15 Boys Shelter ages 12 to 21; is that right?

16 A. Yes. I believe at the Boys Shelter,
17 which is not the same as mentoring.

18 Q. What's the difference? A difference in
19 location?

20 A. No. For me it would have been, again,
21 the opportunity to build relationships with the kids
22 and have my family eventually involved and
23 everything else. It's -- and, to me, it's the
24 difference between them saying that I am suitable
25 to -- because of my faith that I am suitable to

1 work, you know, or be around these children, you
2 know, under the guidance of somebody they have
3 decided is the right faith versus being able to
4 actually mentor the kids and -- in the capacity that
5 somebody who is Protestant would be able to. These
6 are not the same opportunities I'm assuming given to
7 those who can sign the Statement of Faith.

8 Q. And just in the answer you just gave you
9 said these are not the same opportunities I'm
10 assuming.

11 A. I'm sorry. I'm sorry. I should have --
12 that was not the right way to say that. People who
13 can sign their Statement of Faith are able to
14 participate in their foster program in general, are
15 able to participate in -- in non-administrative
16 roles or in mentoring or anything to do with foster
17 children outside of the Children's Home.

18 Q. Okay. So, again, you've identified a
19 difference in location, whether it's at Miracle
20 Hill's facility versus being able to mentor them at
21 some other location. But you don't know what the
22 opportunity is precisely to build a relationship
23 with and connect with children in the Children's
24 Home because you never asked Miracle Hill for that
25 information, did you?

1 A. Would I be given the same opportunities
2 as somebody who can sign their Statement of Faith?
3 I'm not saying -- I'm not asking if they are given
4 the same opportunities as me. I'm asking if they
5 would be the same as somebody who can sign a
6 Statement of Faith.

7 Q. Right.

8 A. I'm asking --

9 Q. Did you ask them that?

10 A. I believe that they mentioned up there
11 that I could mentor and participate, you know, more
12 fully in the program with the other agency that they
13 had...

14 Q. I'm sorry. Were you still -- were you
15 still --

16 A. No. The other agency that they had
17 mentioned.

18 Q. Okay.

19 A. Those that are in the mentoring and
20 fostering programs would be -- you'd have to scroll
21 up for me to see exactly again, but I believe the
22 reason they mentioned the other one again was
23 because of the opportunities that I wanted. This is
24 a list of other opportunities. They mentioned --
25 they mentioned the other agency to specifically fill

1 the mentoring need or the mentoring -- because they
2 stated that -- it's the same one that they were
3 closely affiliated with.

4 Q. And we'll look at that section in just a
5 minute, but for now let's keep our attention on
6 these bullet points and the paragraph after them.
7 These bullet points are volunteer opportunities with
8 Miracle Hill; right?

9 A. Yes.

10 Q. And one of them is volunteering with
11 children at the Children's Home, one of them is
12 volunteering with boys for the Boys Shelter.
13 There's a handful of others that look like they
14 might be more directed at volunteering with adults
15 in need.

16 But at least those two indicate that
17 there were volunteer roles to work with children in
18 foster care at Miracle Hill that were available to
19 you; right?

20 MR. UPTON: Object to the form.

21 THE WITNESS: These are not the same
22 opportunities as the ones that I contacted them
23 about.

24 BY MR. COLEMAN:

25 Q. Did you ask your -- how do you know

1 that? Did you ask if these were --

2 A. Because I believe upward in the
3 e-mail -- I believe the e-mail referenced what I
4 contacted them about and that while they can't meet
5 that need, here are other ones that I am allowed to
6 do. So while I'm not suitable, based on my faith,
7 to work in -- it's a volunteering capacity that I
8 asked them about, these are ones that I guess my
9 faith does not impact.

10 And then they mentioned the same agency
11 that they had mentioned previously that they think I
12 could contact. And, again, these are not -- these
13 are not the ones that I had contacted them about.
14 They reference that upwards.

15 So, I mean, did you ask how do I know
16 that they won't allow me the same opportunity?
17 Because they believe -- they mentioned upward that I
18 contacted them regarding the mentoring program and
19 that while they could not meet that need because I
20 couldn't sign the Protestant Statement of Faith,
21 here are other roles that I could fill.

22 Q. And we'll look at that earlier part of
23 the e-mail in just a minute. But let me ask this
24 again because I'm still not sure if you've answered
25 my question.

1 Does this list of bullet points
2 represent volunteer opportunities at Miracle Hill
3 that were available to you? Yes or no?

4 A. These oppor -- these bullet points
5 represent volunteer opportunities available to me
6 that are outside of the ones that I inquired about.

7 Q. Okay. So yes, these are volunteer
8 opportunities that were available to you at Miracle
9 Hill?

10 A. These are volunteer opportunities that
11 are available to me.

12 Q. Okay. And at least two of them involve
13 volunteer opportunities with children in foster
14 care. They may be different than the opportunity
15 you had asked about, but at least two of them
16 involve volunteer activities with children in foster
17 care; right?

18 MR. UPTON: Object to the form.

19 THE WITNESS: They represent volunteer
20 opportunities with children in foster care that are
21 outside of what I asked for, because what I asked
22 for is not within reach here because of my faith.
23 These are the ones that they have determined I'm not
24 in a role of spiritual adviser to take on.

25 BY MR. COLEMAN:

1 Q. Okay. But at least two of them involved
2 volunteer opportunities with foster children that
3 were available to you; right?

4 MR. UPTON: Object to the form.

5 THE WITNESS: Yes, but it does not
6 negate that they decided that because I attend a
7 certain type of church I cannot mentor children in
8 the same capacity as those who can sign their
9 Statement of Faith.

10 BY MR. COLEMAN:

11 Q. And you never inquired further about
12 what exactly the opportunities that the Children's
13 Home or the Boys Shelter were, did you?

14 A. I inquired about mentoring, and upward
15 it states that that is not within -- that they
16 require a signed Statement of Faith, I believe.

17 Q. But the question I asked you was you
18 never inquired of Miracle Hill about the
19 opportunities, and what would be available as part
20 of those opportunities, to work at the Children's
21 Home or the Boys Shelter, did you?

22 A. No, because they're not what I reached
23 out to them for.

24 Q. And so --

25 A. Those are not the rules. If -- and I

1 Q. That's fine. Go ahead.

2 A. They spilled something, but they're
3 trying not to bother me.

4 Q. Do you need to take a break?

5 A. What time is it? Can we maybe...

6 Q. It's about 11:33 right now. We could
7 break for a few minutes if you need to check on the
8 kids and see what's going on.

9 A. That might be -- that might be a good
10 idea, I guess it's been a little while. I can
11 see what -- yeah. Okay.

12 MR. COLEMAN: Why don't we take a
13 five-minute break and we'll come back around 11:38?

14 THE WITNESS: Thank you so much.

15 (A recess transpired.)

16 BY MR. COLEMAN:

17 Q. So let's continue looking at that -- at
18 that same paragraph we were looking at just before
19 our break. Do you agree that that paragraph tells
20 you that there are other private foster agencies
21 with whom you could mentor foster children?

22 A. I agree that that's what it says.

23 Q. Do you think Miracle Hill was incorrect
24 or trying to deceive you when it said that?

25 A. No.

1 Q. But you didn't pursue mentoring with any
2 of those other agencies, did you?

3 A. No.

4 Q. After you filed this lawsuit Miracle
5 Hill changed its policy and started working with
6 Roman Catholic and orthodox foster parents who could
7 affirm its Statement of Faith; is that right?

8 A. Correct.

9 Q. And a minute ago in that question I said
10 foster parents, but also foster volunteers, mentors?

11 A. Mm-hmm.

12 Q. Of Roman Catholic and orthodox
13 affiliation you could affirm their Statement of
14 Faith; is that also correct?

15 A. That is correct.

16 Q. And I think it was shortly after that
17 the Federal Court here in South Carolina dismissed
18 the first lawsuit you filed but allowed you to --
19 gave you permission and the opportunity to refile;
20 is that right as well?

21 A. I believe so, yes.

22 Q. So between the time that Miracle Hill
23 began working with or changed its policy to be
24 working with Roman Catholic and orthodox foster
25 parents and volunteers and then when you refiled

1 your lawsuit in December of that year.

2 A. Mm-hmm.

3 Q. Did you ever go back to Miracle Hill or
4 call or e-mail and inquire of them to take advantage
5 of that policy change and the new opportunity?

6 A. The policy change still requires that I
7 sign their Statement of Faith, which I cannot
8 agree -- which I cannot do.

9 Q. Okay. And you said I think, actually,
10 in the Complaint that you filed that for you to
11 affirm Miracle's doctrinal statement would be
12 contrary to your Roman Catholic beliefs and --

13 A. As I --

14 Q. -- abandoning your Roman Catholic faith;
15 is that right?

16 A. As I was -- as I know my Catholic faith,
17 yes.

18 Q. Okay. Did you ever talk to your priest
19 about whether the Roman Catholic faith document
20 belief was consistent with Miracle Hill's doctrinal
21 statement?

22 A. I did not because that's -- my personal
23 faith is my personal faith and the Catholic church
24 gives a little bit of leeway there, actually. If
25 it's not, you know, specific to dogma or doctrine

1 there are certain areas that are meant to remain by
2 conscience not -- and the faith that I grew up with,
3 the way that I was taught and what I believe, is not
4 consistent with their Statement of Faith. I cannot
5 sign that Statement of Faith.

6 Q. So just to make sure I understand and
7 I'm not trying to --

8 A. No.

9 Q. -- create or put words in your mouth,
10 and Ken will probably make an objection to the form
11 because it's going to sound like that's what I'm
12 doing, but I just want to make sure I understand and
13 give you a chance to say it again to help me
14 understand it.

15 You are Roman Catholic. Your beliefs
16 and doctrinal beliefs are Roman Catholic, but there
17 are some areas in which your -- your Roman Catholic
18 beliefs may be more particular or different without
19 being contrary to the official teaching and doctrine
20 of the Roman Catholic church. Is that what I'm
21 hearing?

22 A. I don't know. The -- the Catholic faith
23 that I was raised with is not consistent with their
24 Statement of Faith. My personal beliefs now are not
25 consistent with their Statement of Faith. I cannot

1 sign the Statement of Faith.

2 Q. Okay.

3 A. Their -- their policy change still
4 requires that I sign a Statement of Faith.

5 Q. Are your --

6 A. Their...

7 Q. I'm sorry. Go ahead.

8 A. No, you're fine. I was just saying I
9 can't sign their Statement of Faith.

10 Q. Okay. Are your religious beliefs today
11 consistent with Roman Catholic official church
12 doctrine and beliefs?

13 A. I don't know. I don't think so -- on
14 some -- in some areas they are and some areas they
15 aren't.

16 Q. Okay. Did you ever reach out to Miracle
17 Hill to ask about any areas of concern that you had
18 or uncertainty or needing clarity in their doctrinal
19 statement to figure out if there was a way that you
20 could either get some sort of accommodation or
21 exception or better understanding that would allow
22 you to -- to agree to it?

23 A. They had made it very clear a number of
24 times that you have to sign the Statement of Faith.
25 I'm not sure what -- no, I would not have gone back

1 to ask them to clarify. I can read the Statement of
2 Faith so there's no clarification needed.

3 And I've seen many, many, many of those
4 Statements of Faith over the years. I live in an
5 area where Statements of Faith are a pretty typical
6 thing in private groups and everything like that, so
7 there wasn't any clarification needed regarding
8 their Statement of Faith.

9 Q. Why don't we do this? Why don't we take
10 a look at it?

11 A. Yeah.

12 Q. I'll switch the screen that I'm sharing
13 to a different document. You see this? This is the
14 first page. Do you recognize this as the Complaint?

15 A. Yeah --

16 Q. In the lawsuit that you filed on
17 December 20th of 2019?

18 A. Mm-hmm.

19 Q. Okay. So --

20 A. Mm-hmm.

21 Q. I'm going to scroll down -- let's see.
22 Okay. So this is on Page 12 of the Complaint,
23 Paragraph 56. Is this your --

24 A. Yes.

25 Q. -- doctrinal statement here? Okay. And

1 Q. Okay. Let's keep going down the list
2 and talk about any that's...

3 A. (Reading.) I do not believe the second
4 to last.

5 Q. It begins --

6 A. I cannot agree with God ordained the
7 family as the foundational institution of human
8 society. It is composed of persons related to one
9 another by marriage, blood or adoption, and that
10 God's design for marriage is the legal joining of
11 one man and one woman in a life-long covenant
12 relationship.

13 Q. Okay. And what portion of that do you
14 disagree with?

15 A. Pretty much the entirety.

16 Q. Okay. In your belief system you
17 disagree that the family is the foundational
18 institution of human society?

19 A. I believe that a family can be made up
20 of more than a design of marriage, the legal joining
21 of one man and one woman. I believe that there are
22 many ways to make a family and that it doesn't
23 necessarily have to be as it is composed here.

24 Q. And I'm trying to understand. Is the
25 sticking point for you the part about one man and

1 one woman, or is it something else?

2 A. One -- whether it's one man and one
3 woman or a single parent and their child or any
4 number of things can make a family. But I don't
5 believe that it begins and ends with marriage, blood
6 or adoption. I don't agree -- I don't agree that
7 God's design for marriage is the legal joining of
8 one man and one woman -- not solely.

9 Q. And is that where the areas in which
10 your beliefs diverge from the beliefs and doctrine
11 and teaching of the Roman Catholic church?

12 A. Probably.

13 Q. All right. Any other -- anything else
14 on this list that you disagree with or can't affirm?

15 A. The last one.

16 Q. Okay. And explain your disagreement
17 with that.

18 A. God creates each person as either male
19 or female, and these two distinct, complimentary
20 sexes, together reflect the image and nature of God.

21 I believe that there are some people who
22 are neither. I believe that a person's sex is
23 different than their gender sometimes. And I think
24 that all of those people reflect the image and
25 nature of God.

1 Q. And are your beliefs about that another
2 area in which your beliefs differ from the belief,
3 doctrine and teaching of the Roman Catholic church?

4 A. Yes.

5 Q. Are you aware that after Miracle Hill
6 changed policy that the official Theologian of the
7 Roman Catholic Diocese of South Carolina reviewed
8 this doctrinal statement and concluded it was
9 consistent with Roman Catholic doctrine and that a
10 good Roman Catholic could affirm it?

11 A. Like as we had discussed earlier, there
12 are a number of areas -- even taking those two --
13 two last ones out of the mix, there are a number of
14 areas in which Catholics are allowed to use -- even
15 encouraged to use their conscience to make a
16 decision. In other words, there are a number of
17 areas in which it's not necessarily a church rule.
18 There are a number of areas in which it's okay to
19 diverge -- I think, like, the first Solas out there
20 I think was one of them. There are -- most of the
21 Solas I think are open to a matter of conscience, so
22 it's -- a Catholic could sign it but that would be a
23 matter of their conscience and according to what I
24 was raised with that matters, too. But also,
25 according to my own personal beliefs, it's more than

1 just that for me. I can't agree with the last.

2 Q. Okay. And recognizing that you might
3 disagree with --

4 A. Mm-hmm.

5 Q. The stance that the Diocese took, I
6 guess my question is just one of fact. Are you
7 aware that the official Theologian of the Diocese of
8 South Carolina has reviewed this statement, Miracle
9 Hill's doctrinal statement, and concluded that it's
10 consistent with Roman Catholic faith teaching and
11 doctrine and a good Roman Catholic can affirm it?

12 A. I will agree that he said could affirm
13 it, but not that every Catholic would or should.
14 Those are not -- so this -- this does not reflect
15 church dogma, so to speak. It does not reflect
16 church not in the way that I was raised with it. It
17 does not reflect my personal beliefs. I cannot
18 speak on what the Theologian said, what the Diocese
19 said because I'm not them. I can tell you that I
20 cannot sign this Statement of Faith because it does
21 not align with my personal beliefs.

22 Q. Understood. I guess my question is just
23 even if you think they're wrong, but you agree that
24 the Diocese said that?

25 A. Yeah.