IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

DAVID KING, et al.,	
Plaintiffs,	
v.)	Civ. No. 13-630
KATHLEEN SEBELIUS, et al.,	
Defendants.)	
)	

DECLARATION OF BRITTANY LA COUTURE

- I, Brittany La Couture, do hereby declare:
- 1. I am a health policy researcher at the Cato Institute specializing in implementation and effects of the Patient Protection and Affordable Care Act, in particular the Internal Revenue Service final rule implementing the Act's premium-assistance tax credits. I hold a Juris Doctorate from Georgetown University Law Center.
- 2. Plaintiffs and their counsel have asked me to review insurer rate filings to determine the cheapest "bronze" health plan and second-cheapest "silver" health plan that have been approved for sale on Virginia's federally facilitated Exchange for four individuals, based on their age, county or municipality of residence, gender, and smoking or non-smoking status. I have personally reviewed the relevant filings, and my findings are set forth below.
- 3. For a 63-year-old male smoker who resides at 6214 John Wayne Drive, Fredericksburg, Virginia 22407, the cheapest bronze plan approved for sale on the federal Exchange in Virginia costs \$634.98 per month. The second-cheapest silver plan for the same individual, but without taking into account the "smoking surcharge" (*i.e.*, assuming that he did not smoke) would cost \$643.99 per month.

Case 3:13-cv-00630-JRS Document 5-2 Filed 09/19/13 Page 2 of 2 PageID# 62

4. For a 62-year-old male non-smoker who resides at 4839 Kempsville Greens

Parkway, Virginia Beach, Virginia 23462, the cheapest bronze plan approved for sale on the

federal Exchange in Virginia costs \$477.51 per month. The second-cheapest silver plan for the

same individual would cost \$625.02 per month.

5. For a 63-year-old female non-smoker who resides at 2724 Mohawk Drive,

Richmond, Virginia 23235, the cheapest bronze plan approved for sale on the federal Exchange

in Virginia costs \$392.73 per month. The second-cheapest silver plan for the same individual

would cost \$584.53 per month.

6. For a 55-year-old female smoker who resides at 2209 County Drive, Petersburg,

Virginia 23803, the cheapest bronze plan approved for sale on the federal Exchange in Virginia

costs \$356.01 per month. The second-cheapest silver plan for the same individual, but without

taking into account the "smoking surcharge" (i.e., assuming that she did not smoke) would cost

\$441.56 per month.

I declare under penalty of perjury that the foregoing is true and correct to the best of my

knowledge.

Executed on this 16th day of September, 2013.

Luttane Ja Cartere Brittany La Courure