

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

ILLINOIS COLLABORATION ON YOUTH, *et al.*,)
)
Plaintiffs,)
)
v.)
)
BRUCE RAUNER, GOVERNOR OF ILLINOIS, in his)
official capacity, *et al.*,)
)
Defendants.)

Case No. 2016 CH 6172

AFFIDAVIT OF MICHAEL TURNER

1. My name is Michael Turner.
2. I am the owner of Senior Helpers – Lincolnwood, which is an independently-owned Senior Helpers franchise. We provide home care services for the elderly who require assistance with activities of daily living in order to remain in their homes. Many of these seniors would have to enter nursing homes if not for our help with bathing, dressing, medication reminders, light housekeeping, and maintaining their homes in a safe condition. Nursing home placement costs the state nearly twice as much as in-home care.
3. Approximately 72% of my organization’s funding comes from the Illinois Department on Aging. Approximately 44% of this funding is Medicaid clients, for which we have been paid sporadically in fiscal year 2016. We have not received payment on our Department of Aging contract for the other 56% of our funding, throughout the entire fiscal year.
4. I am pulling from my own savings – specifically, from my personal 401(k) retirement account - to meet payroll and otherwise keep Senior Helpers open. If I had not done so, my organization would have closed by January 26, 2016.

5. I estimate that without funding from the Department on Aging, we will have to close our doors in mid-June
6. Despite using my savings to keep us afloat, I had to fire our client manager, who was a key staff member. I have been unable to fill another key office position, and, because we have been unable to give raises, we have had significant turnover of staff.
7. We provide our services at 25% below market rate because the state reimbursement rate is low. That means that our margins are very thin, and we require a volume of clients to stay afloat.
8. We had to stop accepting clients at the beginning of February.
9. Despite not receiving any of the funding from our contract with the Department on Aging, the Department requires us to continue providing services and honoring the contract terms.
10. We owe at least \$95,000. We have exhausted our credit line.
11. Based on our contract with the Department of Aging, my organization grew substantially. However, due to the absence of funding from the Department, we are now unable to fulfill our growth plan.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Dated: MAY 24, 2016


Michael Turner