

STATE OF MINNESOTA
COUNTY OF RAMSEY

FILED
Court Administrator
JUN 27 2011
By BH Deputy

DISTRICT COURT
SECOND JUDICIAL DISTRICT

In Re Temporary Funding of
Core Functions of the Executive Branch
of the State of Minnesota.

**AFFIDAVIT OF
DAVID R. LAWLESS**

Court File No. 62-CV-11-5203

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

David R. Lawless, being first duly sworn upon oath, deposes and says that:

1. I am the Director of Budget and Finance for Hennepin County, and this Affidavit is based upon my personal knowledge in that capacity.

2. Hennepin County receives federal funding through the State of Minnesota, for a number of its programs and services.

3. Hennepin County Medical Center ("HCMC") is Hennepin County's public hospital and Level I Trauma Center. On information and belief, HCMC received approximately \$200 million in 2010 from the State of Minnesota for Minnesota Health Care Programs, including Medical Assistance, General Assistance Medical Care and MinnesotaCare. Approximately half of those funds were federal Medicaid match funds. HCMC receives its state payments on a twice-monthly basis.

4. NorthPoint Health and Wellness Center ("NorthPoint") is Hennepin County's federally qualified health center ("FQHC"). On information and belief, in 2010, NorthPoint received approximately \$3.8 million from the State of Minnesota for Medicaid claims, and half of those payments were federal match funds. NorthPoint also received \$6.8 million in FQHC

wrap-around payments from the State, and half of those payments were federal match funds. NorthPoint receives its state payments (including federal match funds) on a monthly basis.

5. The Metropolitan Health Plan ("MHP") is Hennepin County's health maintenance organization. On information and belief, MHP provides health care coverage to approximately 19,000 members pursuant to a contract with the Minnesota Department of Human Services. MHP receives approximately \$150 million per year from the State of Minnesota for its services, through monthly capitation payments. Approximately half of those funds are federal match funds.

6. Hennepin County also receives federal pass-through funds from the State of Minnesota to staff and administer numerous federal programs. On information and belief, in 2010, Hennepin County received \$4 million in federal funds from the State of Minnesota to staff and administer the federal Women, Infants and Children program. Those payments were made on a monthly and quarterly basis. Hennepin County also received \$21 million of blended state and federal funds from the State of Minnesota to staff and administer the Minnesota Family Investment Program. Those payments were made on a quarterly basis. In addition, Hennepin County received \$59 million in payments from the State of Minnesota, to staff and administer numerous health programs, including but not limited to child welfare, adult mental health, children's mental health, and vulnerable adult case management. Those payments were made on a monthly and quarterly basis and were largely made of federal pass-through funds.

7. Hennepin County relies on the State of Minnesota to timely pay both state and federal funds for its services and programs.

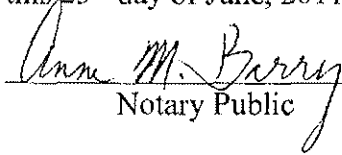
FURTHER AFFIANT SAYETH NOT.



David R. Lawless
Hennepin County

Subscribed and sworn to before me

this 23rd day of June, 2011.



Notary Public