

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

ILLINOIS COLLABORATION ON YOUTH, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	Case No. 2016 CH 6172
v.	)	
	)	
BRUCE RAUNER, GOVERNOR OF ILLINOIS, in his	)	
official capacity, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF SHANNON STEWART**

1. My name is Shannon Stewart.
2. I am the Executive Director of Inspiration Corporation, which helps people who are affected by homelessness and poverty to improve their lives and increase self-sufficiency through the provision of social services, employment training and placement, and housing. In this affidavit, I describe one of our programs that – based on the state’s failure to fund its contract with us – has been compromised beyond recognition, and is at risk of closing down.
3. The program identifies homeless people and families who need housing, and places them in apartments that are set aside as “Homeless Dedicated Units.” This is only the start of the services provided, however. Because many of these tenants have not previously had their own apartments, and some have mental illness, our case managers, called Housing Retention Specialists, coordinate key services for them.
4. Our Housing Retention Specialists help our clients learn their rights as tenants, understand and conform to their leases, communicate with their landlords, and ensure that they pay their rent consistently. (The Chicago Low-Income Housing Trust Fund provides rent money to landlords under the program, but our tenants still submit up to 35% of their income in rent.)

5. Many of our clients lack basic knowledge that jeopardizes their ability to stay in their apartments and off the streets. For example, one of our case clients repeatedly had his rent check returned to him until his case manager discovered that he did not know how to properly address an envelope.

6. Another example: one of our clients, because she had not before had a landlord, texted him repeatedly when she had a repair need. The landlord came close to evicting her based on what he perceived as her harassment. One of our case managers successfully counseled her in how to improve her relationship with her landlord.

7. Our Housing Retention Specialists also assist our tenant families with financial literacy and budgeting, applications for benefits, transportation to key appointments, navigation of health care systems, substance abuse service, and the enrollment of their children in school.

8. Landlords participate in the program voluntarily. Without the services of our case managers, landlords may decide that our tenants pose intolerable challenges, and the tenants could again find themselves homeless. Indeed, in the month of May, four separate landlords have requested our assistance. These landlords rely on our services in order to continue renting to our participants. If these landlords did not have our assistance they would not continue to rent to tenants who require additional assistance.

9. An eviction can be particularly devastating to our clients. This is because, once a person has an eviction on her record, it is very difficult for her to obtain housing in the future.

10. In addition, Inspiration Corporation staff members are the point people to ensure that when a new apartment comes available to a homeless household under the city referral system, that apartment is indeed filled by a homeless household. If the unit is not filled quickly,

many landlords decide to move on and find tenants on their own. While those tenants will be low income, they are highly unlikely to be people who are homeless.

11. Without enough staff working to reach out to potential tenants to fill these units, they are at risk of being permanently lost to the homeless system. The Chicago Low-Income Housing Trust Fund has only 450 homeless dedicated units, and each time a homeless family is not placed in a newly-opened unit, that number may permanently decrease. Fewer units dedicated to homeless families increases shelter usage and drives up costs. Reductions in housing for homeless people also make Chicago less competitive when competing for homeless services funding from the U.S. Department of Housing and Urban Development.

12. Our funding for this program comes from a contract with the Illinois Department of Human Services (IDHS). However, IDHS has not funded its contract with us for the entire fiscal year 2016. As a result, we have accrued \$118,000 of unpaid receivables for work we have performed under the contract.

13. Under the contract, we are to provide services to formerly-homeless families in 74 Homeless Dedicated Units.

14. Unless IDHS funds our contract, we will have to suspend all services for these 74 households on June 30, 2016.

15. I can provide examples of what it will mean for these households to lose our services. 85 children led by single mothers will not receive assistance to ensure that they are enrolled in school with necessary supplies and uniforms, or – for the young children – placed in safe childcare. Our staff is trained to help tenants access all available resources, and advocate for children to stay in their school of origin, even when the head of household has experienced homelessness.

16. Without a dedicated staff member to help the head of household navigate the often complex world of housing assistance, these 85 children also risk losing safe and affordable housing.

17. Even before we have to suspend all our services at the end of June, we have already drastically curtailed our services. Based on the lack of contract funding, along with reduced appropriation, we have laid off all our case managers for the 74 households. That means that we had to eliminate all home visits and scheduled office and phone meetings with tenants. Now, we can only try to deal emergencies, and we lack the structure to effectively perform this basic function. We are left with an intern who takes emergency calls from landlords or tenants, and routes them to our Director of Housing and Supportive Services, who should not have a caseload because of her many other responsibilities.

**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 she verily believes the same to be true.**

Dated: 5/24/2016



Shannon K. Stewart