

**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 ANNE STATTON**

1. My name is Anne Statton.
2. I am the Executive Director of the Pediatric AIDS Chicago Prevention Initiative, a not-for-profit.
3. Our services are crucial: we help prevent babies from being born with HIV. Our organization is a national model, and we have been commended by the Centers for Disease Control as a “model and inspiration” for HIV prevention efforts nationwide. *See Exhibit A (CDC letter)*. In fact, we are the *only organization completely focused on prevention of mother-to-child transmission of HIV* in the country.
4. Our mission and accomplishment - eliminating pediatric AIDS in Illinois - is at serious risk. If the Illinois Department of Public Health does not fulfill their contract and pay us, we will have to close our doors in December.
5. What makes us unique nationally is our support and linkage for women with HIV throughout their pregnancies, and throughout the state, making sure they receive the necessary treatments. Even if a pregnant woman with HIV leaves her health provider, we can help locate her, and help her link to care elsewhere in Illinois or

anywhere in the U.S. This is critical, as these women must be followed up to and through delivery and the crucial postpartum period to ensure that their infants do not contract HIV.

6. We also run a hotline that is mandated by Illinois law (410 ILCS 335). People call from across the Midwest to address with our experts emergency issues regarding pregnancy and HIV, to report rapid HIV results in pregnant and delivering women or newborns, and to help locate HIV-positive pregnant women who have fallen through the cracks. If we are forced to shut down, this State-mandated hotline would shut down as well.

7. Without proper intervention, a newborn baby has a 1 in 4 chance of contracting HIV from her HIV-positive mother. For babies born to mothers in precarious financial and social situations – the women whom my organization serves – the risk is even higher.

8. On the other hand, if an HIV-positive pregnant woman receives necessary treatment, the risk that her baby will contract HIV drops to less than 1 percent. These treatments include medication during the pregnancy, specific birth procedures, and medications to the newborn for the first four to six weeks of life.

9. Pediatric AIDS Chicago Prevention Initiative has been incredibly effective: last year in Illinois there were zero transmission of HIV from mothers to babies born in 2015.

10. The lifetime cost of treating a baby born with HIV is estimated at \$1,000,000. By our estimates, we helped prevent HIV transmission to between 35 and 70 Illinois newborns last year – representing up to \$70 million saved.

11. We receive approximately 85% of our funding from the Illinois Department of Public Health. We are owed over \$600,000 from the Department – they have not paid the GRF dollars allocated to our contract for the entire fiscal year.

12. If we are not paid by the Department, we will run out of money in December and will be forced to shut down.

13. Although we are not being paid, the IDPH is still requiring us to submit all quarterly reports and other paperwork.

14. We are using last year's money to pay for this year's services.

15. We have no assets, and therefore we have no access to lines of credit. Our office is a donated space. Because our case managers are constantly out in the field, our overhead is so low that we have no way to scale down.

16. Before coming to PACPI, I was Director of HIV Programs at the Chicago Department of Public Health, and have 30 years experience as a public health administrator. I was the first hire at PACPI, working here for 16 years. In my 16 years, PACPI has never been in the desperate situation we are in now.

17. Two of our case managers have been with us for over 20 years combined, and have amassed highly specialized knowledge in this field, and regarding the geography and social circumstances of the areas they serve. If we were forced to let these and other specialists go, it would be an enormous loss to Illinois. In order to continue doing the kind of work they are performing, they would have to move to programs in other states.

18. In addition to preventing pediatric AIDS, our case managers provide many additional key services to mothers to improve their circumstances and parenting. See Exhibit B (Crain's Chicago op-ed).

19. It took us years to build up our network, and to become completely and fully operational. If we are forced to shut our doors, it would be years again before we could rebuild the organization. No other group such as ours exists in Illinois that could replicate our services.

**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: 5/24/16

  
Anne Statton