

FILED 5  
2016 MAY 25 AM 8:23

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

ILLINOIS COLLABORATION ON YOUTH, )  
ABCOR HOME HEALTH INC., ADDUS )  
HEALTHCARE INC., AIDS FOUNDATION )  
OF CHICAGO, ALTERNATIVES, INC., AUNT )  
MARTHA'S YOUTH SERVICES CENTER, )  
CARITAS FAMILY SOLUTIONS, CARROLL )  
COUNTY HEALTH DEPARTMENT, STEPHENSON )  
COUNTY HEALTH DEPARTMENT, CENTER ON )  
HALSTED, CENTER FOR HOUSING AND HEALTH, )  
CENTERSTONE, CHADDOCK, CHICAGO )  
COMMONS, CHICAGO HOUSE, AND SOCIAL )  
SERVICE AGENCY, CHILDREN'S HOME + AID, )  
CHILDREN'S HOME ASSOCIATION )  
OF ILLINOIS, COMMUNITY YOUTH NETWORK, )  
INC., CUNNINGHAM CHILDREN'S HOME OF )  
URBANA, IL, DUPAGE YOUTH SERVICES, FAMILY )  
COUNSELING CENTER, INC., FEATHERFIST, FOX )  
VALLEY OLDER ADULT SERVICES, HAVEN )  
YOUTH AND FAMILY SERVICES, HEARTLAND )  
HUMAN CARE SERVICES, HOUSING )  
OPPORTUNITIES FOR WOMEN, HUMAN SUPPORT )  
SERVICES, ILLINOIS COALITION AGAINST )  
SEXUAL ASSAULT, ILLINOIS PUBLIC HEALTH )  
ASSOCIATION, INDIAN OAKS ACADEMY, )  
INSPIRATION CORPORATION, INTERFAITH )  
HOUSING DEVELOPMENT CORPORATION, )  
JEWISH CHILD AND FAMILY SERVICES, JEWISH )  
VOCATIONAL SERVICE AND EMPLOYMENT )  
CENTER KEMMERER VILLAGE, KNOX COUNTY )  
HEALTH DEPARTMENT, LA CASA NORTE, LESSIE )  
BATES DAVIS NEIGHBORHOOD HOUSE, )  
LUTHERAN CHILD AND FAMILY SERVICES, )  
MEDICAL GEAR, LLC, METROPOLITAN FAMILY )  
SERVICES, MIDWEST YOUTH SERVICES, NEW )  
AGE ELDER CARE, NEW MOMS, NEXUS, INC., )  
NICASA, OMNI YOUTH SERVICES, ONE HOPE )  
UNITED, PEDIATRIC AIDS, CHICAGO )  
PREVENTION INITIATIVE, OUNCE OF PREVENTION )  
FUND, POLISH AMERICAN ASSOCIATION, )  
PROJECT OZ, PUERTO RICAN CULTURAL CENTER )  
RENAISSANCE SOCIAL SERVICES, REVIVE )  
CENTER FOR HOUSING AND HEALING, RIVER )  
TO RIVER SENIOR SERVICES, ROCK ISLAND )  
COUNTY HEALTH DEPARTMENT, SAN JOSE )

Case No. 16-CH-6172

OBRERO MISSION, SENIOR HELPERS, SENIOR )  
SERVICES PLUS INC., SHELTER, INC., )  
SINNISSIPPI CENTERS, STEPHENSON COUNTY )  
HEALTH DEPARTMENT, STEPPING STONES OF )  
ROCKFORD, INC., TEEN LIVING PROGRAMS, TEEN )  
PARENT CONNECTION, THE BABY FOLD, THE )  
BRIDGE YOUTH AND FAMILY SERVICES, THE )  
CENTER FOR YOUTH AND FAMILY SOLUTIONS, )  
THE FELLOWSHIP HOUSE, THE HARBOUR, )  
THE NIGHT MINISTRY, THE RESURRECTION )  
PROJECT, TURNING POINT BEHAVIORAL HEALTH )  
CARE CENTER, UNITY PARENTING AND )  
COUNSELING, VANGUARD HEALTH AND )  
WELLNESS, LLC., UNIVERSAL FAMILY )  
CONNECTION, WESTERN ILLINOIS MANAGED )  
HOME SERVICES, WHITESIDE COUNTY HEALTH )  
DEPARTMENT, YOUTH ADVOCATE PROGRAM, )  
YOUTH CROSSROADS, YOUTH OUTREACH )  
SERVICES, YOUTH SERVICE BUREAU OF )  
ILLINOIS VALLEY, )

Plaintiffs, )

v. )

JAMES DIMAS, SECRETARY OF )  
THE ILLINOIS DEPARTMENT OF HUMAN )  
SERVICES, in his official capacity, JEAN )  
BOHNHOFF, ACTING DIRECTOR OF THE ILLINOIS )  
DEPARTMENT ON AGING, in her official )  
capacity, NIRAV SHAH, DIRECTOR OF THE )  
ILLINOIS DEPARTMENT OF PUBLIC HEALTH, )  
in his official capacity, and FELICIA NORWOOD, )  
DIRECTOR OF THE ILLINOIS DEPARTMENT OF )  
HEALTHCARE AND FAMILY SERVICES, in her )  
official capacity, JOHN R. BALDWIN, DIRECTOR )  
OF THE ILLINOIS DEPARTMENT OF )  
CORRECTIONS, in his official capacity, )  
MICHAEL HOFFMAN, ACTING DIRECTOR OF THE )  
ILLINOIS DEPARTMENT OF CENTRAL )  
MANAGEMENT SERVICES, in his official )  
capacity, AUDRA HAMERNIK, EXECUTIVE )  
DIRECTOR OF THE ILLINOIS HOUSING )  
DEVELOPMENT AUTHORITY, in her official )  
capacity, LESLIE GEISSER MUNGER, )  
COMPTROLLER FOR THE STATE OF ILLINOIS, )  
in her official capacity, and BRUCE RAUNER, )

GOVERNOR OF ILLINOIS, in his official capacity, )  
  )  
  )  
  )  
  )  
Defendants.  )

**PLAINTIFFS' MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**

Plaintiffs Illinois Collaboration on Youth, et al., by their undersigned counsel, respectfully move this Court for leave to file the attached First Amended Complaint. In support of this motion, plaintiffs state:

1. The principal purpose of this amended complaint is to add seventeen additional organizations as plaintiffs.

2. The additional plaintiffs are as follows: Abcor Home Health, Inc., Chicago Commons, DuPage Youth Services Inc., Heartland Human Care Services, Housing Opportunities for Women (HOW), Human Support Services, Lessie Bates Davis Neighborhood House, Medical Gear LLC, Ounce of Prevention Fund, Polish American Association, Shelter, Inc., Stepping Stones of Rockford, Inc., Teen Parent Connection, The Fellowship House, The Resurrection Project, Turning Point Behavioral Health Care Center, Vanguard Health & Wellness LLC

3. The additional plaintiffs are identically situated with the original named plaintiffs. They have received no payment from the defendant state officials for the services they have rendered in fiscal year 2016 to date.

4. Plaintiffs have filed new Exhibits H & I to include the contracts that the additional plaintiffs have signed with the respective defendant directors.

5. There has been no responsive pleading to date and defendants will not be prejudiced by the addition of these plaintiffs.

6. Plaintiffs have also added the Illinois State Comptroller, Leslie Geissler Munger, as an additional defendant for purpose of relief only. Except where she is specifically named in the prayer for relief, she is excluded from the term "defendants" as used in the complaint.

7. Finally, plaintiffs have further detailed in Count I how the conduct of the defendant state officials is inconsistent with Article VII and other provisions of the Illinois Constitution.

Respectfully submitted,

By: /s/ Thomas H. Geoghegan  
One of Plaintiffs' Attorneys

Dated: May 25, 2016

Thomas H. Geoghegan  
Michael P. Persoon  
Sean Morales-Doyle  
Despres, Schwartz & Geoghegan, Ltd.  
77 West Washington Street, Suite 711  
Chicago, Illinois 60602  
(312) 372-2511  
Cook County Attorney #70814

**Certificate of Service**

The undersigned attorney certifies he caused the foregoing Motion to be served on the persons listed below on May 25, 2016, by personal delivery:

Lisa Madigan<sup>1</sup>  
Illinois Attorney General  
100 West Randolph Street  
Chicago, Illinois 60601

Bruce Rauner  
Governor, State of Illinois  
100 West Randolph Street  
Chicago, Illinois 60601

Dated: May 25, 2016

By:   
\_\_\_\_\_  
One of Plaintiffs' Attorneys

Thomas H. Geoghegan  
Michael P. Persoon  
Sean Morales-Doyle  
Despres, Schwartz & Geoghegan, Ltd.  
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Chicago, Illinois 60602  
(312) 372-2511  
Cook County Attorney #70814

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<sup>1</sup> No defendant has answered or appeared. As each of the defendants other than Governor Rauner is sued in their official capacity, service is being provided to the Illinois Attorney General.