

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 (DWF/BRT)

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.

Defendants.

**AFFIDAVIT OF MARGARET
FLETCHER BOOTH, PH.D.
CONCERNING FILING OF
DOCUMENTS RELATING TO THE
MARCH 2019 SUMMARY REPORT
UNDER SEAL**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, Margaret Fletcher Booth, being first duly sworn on oath, state as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Director of Quality Assurance and Disability Compliance Services. I have personal knowledge of the facts in this affidavit.

2. I am familiar with the above-captioned case and settlement.

3. The unredacted version of the March 2019 Summary Report contains private welfare data under Minn. Stat. § 13.46, subd. 2(a) that DHS is prohibited from publicly disclosing.

4. The unredacted version of the Identifier Key contains private welfare data under Minn. Stat. § 13.46, subd. 2(a) that DHS is prohibited from publicly disclosing.

5. Attachments 1 through 5 to the March 2019 Summary Report contain private welfare data under Minn. Stat § 13.46, subd. 2(a). The entirety of Attachments 1 through 5 to the March 2019 Summary Report are confidential for filing purposes due to the presence of the above-referenced private welfare data or redaction of the private data is impracticable.

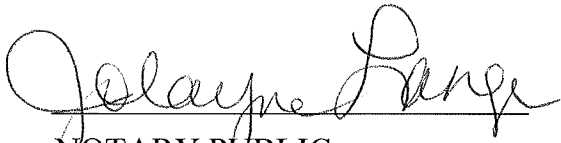
6. Attachment 6 to the March 2019 Summary Report contains no private data and is not confidential.

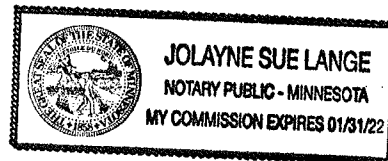
FURTHER YOUR AFFIANT SAYETH NOT.


MARGARET FLETCHER BOOTH, Ph.D.

Subscribed and sworn to before on

March 19, 2019


NOTARY PUBLIC



in the Report in an affidavit; and (d) conducted the supplemental verification activities described in relevant sections of the Report.

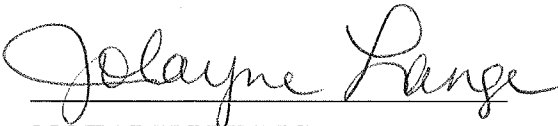
4. Based on this process and my own personal knowledge, I verify that the data in the Report is reliable and valid, and that statements in the Report are accurate, complete, timely, and verified.

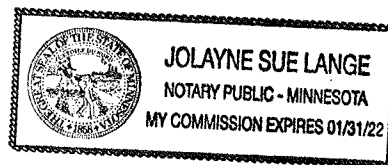
FURTHER YOUR AFFIANT SAYETH NOT.


MARGARET FLETCHER BOOTH, Ph.D.

Subscribed and sworn to before me on

March 19, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

Defendants.

**AFFIDAVIT OF MARGARET
FLETCHER BOOTH, PH.D.
CONCERNING VERIFICATION OF
MARCH 2019 SUMMARY REPORT**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, MARGARET FLETCHER BOOTH, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Director of Quality Assurance and Disability Compliance Services.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report (Report).

3. I have personal knowledge of the information in the following sections of the Report and verify that the data therein is reliable and valid and that the statements therein are accurate, correct and timely:

- a. July 1, 2018 to December 31, 2018 Updates regarding Evaluation Criteria 39, 41, and 98; and
- b. the historical and current information regarding Evaluation Criteria 26, 27, 42, 43, 44, 86, 87, and 95.

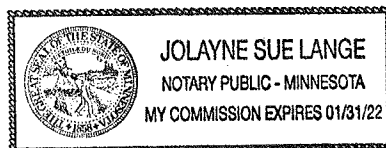
4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted staff at DHS so that the data can be filed under seal.

FURTHER YOUR AFFIANT SAYETH NOT.


MARGARET FLETCHER BOOTH, Ph.D.

Subscribed and sworn to before me on

March 19, 2019




NOTARY PUBLIC

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 (DWF/BRT)

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.

**AFFIDAVIT OF MARGARET
FLETCHER BOOTH, PH.D.
CONCERNING VERIFICATION OF
MARCH 2019 SUMMARY REPORT**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, MARGARET FLETCHER BOOTH, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Director of Quality Assurance and Disability Compliance Services.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report ("Report").

3. I have personal knowledge of the information in the following sections of the Report and verify that the data therein is reliable and valid and that the statements therein are accurate, complete, timely and verified: Section I.

4. I further verify that data contained in portions of the Report described at paragraph 3 is either public data under applicable laws, or (2) if it is not-public data, the

data subject(s) of any such not public data have consented to such data being used publicly,
or (3) I have alerted staff at DHS so that the data can be filed under seal.

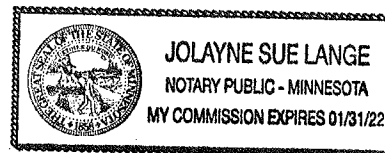
FURTHER YOUR AFFIANT SAYETH NOT.


MARGARET FLETCHER BOOTH, PH.D.

Subscribed and sworn to before me on

March 15, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 (DWF/BRT)

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.

**AFFIDAVIT OF MARGARET
FLETCHER BOOTH, PH.D.
CONCERNING VERIFICATION OF
MARCH 2019 SUMMARY REPORT**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, MARGARET FLETCHER BOOTH, being first duly sworn on oath, state as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Director of Quality Assurance and Disability Compliance Services. I have personal knowledge of the facts in this affidavit.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report ("Report").

3. In order to verify that the data in Section II, Part A is reliable and valid and that the statements therein are accurate, complete, timely and verified, Quality Assurance and Disability Compliance Services (QADC Services) at DHS obtained information from

the following sources: case managers and other lead agency staff, DHS databases MMIS and MAXIS, Thompson Reuters CLEAR software, Find A Grave website and Minnesota Department of Correction Offender Locator website. Based on the above-referenced process and the information QADC Services obtained, I verify that the data in Section II, Part A is reliable and valid and that the statements therein are accurate, complete, and timely.

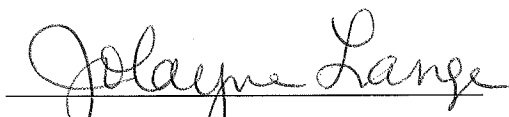
4. I further verify that data contained in portions of the Report described at paragraph 3 is either public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted staff at DHS so that the data can be filed under seal.

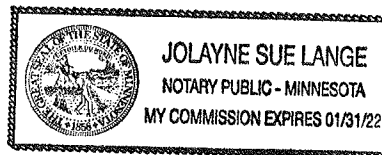
FURTHER YOUR AFFIANT SAYETH NOT.


MARGARET FLETCHER BOOTH, PH.D.

Subscribed and sworn to before me on

March 15, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

**AFFIDAVIT OF
DANIEL J. BAKER, PH.D.
CONCERNING VERIFICATION OF
MARCH 2019 SUMMARY REPORT**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, DANIEL J. BAKER, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as the Jensen Internal Reviewer, Quality Assurance and Disability Compliance Services.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report (Report).

3. I have personal knowledge of the information in the following sections of the Report and verify that the data therein is reliable and valid and that the statements therein are accurate, correct and timely: July 1, 2018 to December 31, 2018 Updates regarding Evaluation Criteria 39, 41, and 98.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.

FURTHER YOUR AFFIANT SAYETH NOT.



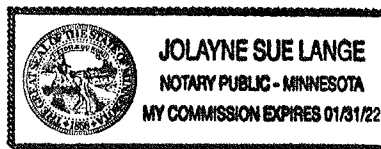
DANIEL J. BAKER, PH.D.

Subscribed and sworn to before me on

March 14, 2019



NOTARY PUBLIC



UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

**AFFIDAVIT OF
WADE BROST CONCERNING
VERIFICATION OF MARCH 2019
SUMMARY REPORT**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF ANOKA)

I, WADE BROST, being first duly sworn on oath, states as follows:

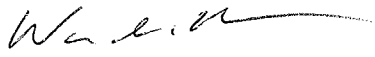
1. I am employed by the Minnesota Department of Human Services (“DHS”) as Executive Director, Mental Health and Substance Abuse Treatment Services, Direct Care and Treatment Health Systems.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report (Report).

3. I have personal knowledge of the information in the following section of the Report and verify that the data therein is reliable and valid and that the statements therein are accurate, correct and timely: the historical and current information regarding Evaluation Criterion 85.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.

FURTHER YOUR AFFIANT SAYETH NOT.



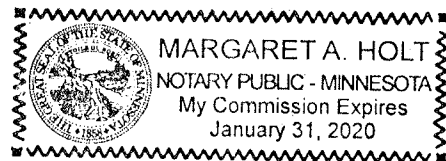
WADE BROST

Subscribed and sworn to before me on

March 18, 2019



NOTARY PUBLIC



UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 (DWF/BRT)

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.

**AFFIDAVIT OF CATHERINE
COURCY CONCERNING
VERIFICATION OF MARCH 2019
SUMMARY REPORT**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, CATHERINE COURCY, being first duly sworn on oath, state as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Associate General Counsel. I have personal knowledge of the facts in this affidavit.
2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report ("Report").
3. In order to verify that the data in Section II, Part B is reliable and valid and that the statements therein are accurate, complete, timely and verified, DHS obtained information from the following sources: case managers and other lead agency staff, MMIS, DHS Direct Care and Treatment files and databases, DHS Successful Life Project files and databases, MnChoices assessments, LTSS improvement tools, DHS Office of Inspector

General records, Minnesota Court Information System and DHS Disability Services Division database.

4. Based on the above-referenced process and the information DHS obtained, I verify that the data in Section II, Part B is reliable and valid and that the statements therein are accurate, complete, and timely.

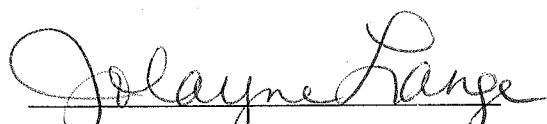
5. I further verify that data contained in portions of the Report described at paragraph 3 is either public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted staff at DHS so that the data can be filed under seal.

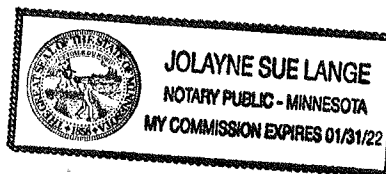
FURTHER YOUR AFFIANT SAYETH NOT.


CATHERINE COURCY

Subscribed and sworn to before me on

March 15, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

**AFFIDAVIT OF STEVEN DAHL
CONCERNING VERIFICATION OF
MARCH 2019 SUMMARY REPORT**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, STEVEN DAHL, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Director, Community Support Services and Short Term Residential Services.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in Defendants' March 2019 Summary Report ("Report").

3. I have personal knowledge of the information in the following sections of the Report and verify that the data therein is reliable and valid and that the statements therein are accurate, correct and timely:

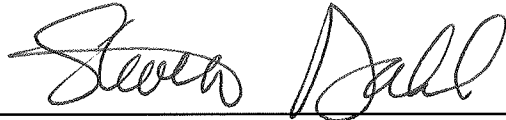
- a. July 1, 2018 to December 31, 2018 Updates regarding Evaluation
Criteria 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, and 93, and

b. January 1, 2018 to December 31, 2018 Updates regarding Evaluation

Criteria 96.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.

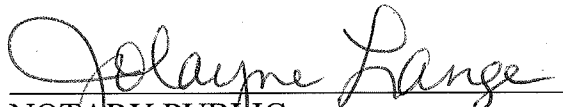
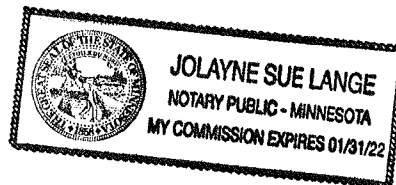
FURTHER YOUR AFFIANT SAYETH NOT.



STEVEN DAHL

Subscribed and sworn to before me on

March 18, 2019


NOTARY PUBLIC

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

**AFFIDAVIT OF
ALYSSA DOTSON CONCERNING
VERIFICATION OF MARCH 2019
SUMMARY REPORT**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, ALYSSA DOTSON, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (“DHS”) as Quality Assurance Manager, Office of the Inspector General.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report (Report).

3. I have personal knowledge of the information in the following section of the Report and verify that the data therein is reliable and valid and that the statements therein are accurate, correct and timely: the historical and current information regarding Evaluation Criteria 25.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.

FURTHER YOUR AFFIANT SAYETH NOT.



ALYSSA DOTSON

Subscribed and sworn to before me on

March 15, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

**AFFIDAVIT OF CAROL OLSON
CONCERNING VERIFICATION OF
MARCH 2019 SUMMARY REPORT**

Minnesota Department of Human
Services, et al.,

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF NICOLLET)

I, CAROL OLSON, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Executive Director, Forensic Services.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report (Report).

3. I have personal knowledge of the information in the following sections of the Report and verify that the data therein is reliable and valid and that the statements therein are accurate, correct and timely:

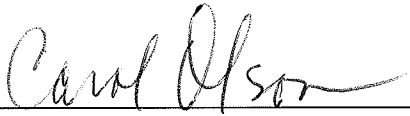
- a. January 1, 2018 to December 31, 2018 Updates regarding Evaluation Criteria 81, 83, and 84; and

b. the historical and current information regarding Evaluation Criteria

82.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.

FURTHER YOUR AFFIANT SAYETH NOT.


CAROL OLSON

Subscribed and sworn to before me on

March 15, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

**AFFIDAVIT OF
KAREN SULLIVAN HOOK
CONCERNING VERIFICATION OF
MARCH 2019 SUMMARY REPORT**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, KAREN SULLIVAN HOOK, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Deputy Senior Counsel and Administrative Law Office Manager.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report (Report).

3. I have personal knowledge of the information in the following sections of the Report and verify that data therein is reliable and valid and that the statements therein are accurate, correct and timely:

a. July 1, 2018 to December 31, 2018 Update regarding Evaluation Criteria

103;

- b. January 1, 2018 to December 31, 2018 Updates regarding Evaluation Criteria 80, 100 and 101; and
- c. the historical and current information regarding Evaluation Criteria 99, 102, and 104.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted the QADC Services at DHS so that the data can be filed under seal.

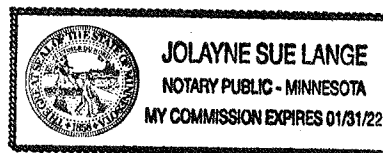
FURTHER YOUR AFFIANT SAYETH NOT.

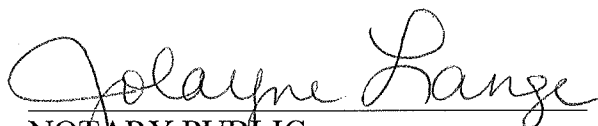


KAREN SULLIVAN HOOK

Subscribed and sworn to before me on

March 18, 2019





NOTARY PUBLIC

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

Minnesota Department of Human
Services, et al.,

**AFFIDAVIT OF
MICHAEL TESSNEER
CONCERNING VERIFICATION OF
MARCH 2019 SUMMARY REPORT**

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, MICHAEL TESSNEER, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Director of Compliance, Olmstead Implementation Office.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report (Report).

3. I have personal knowledge of the information in the following section of the Report and verify that the data therein is reliable and valid and that the statements therein are accurate, correct and timely: January 1, 2018 to December 31, 2018 Updates regarding Evaluation Criteria 79.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.

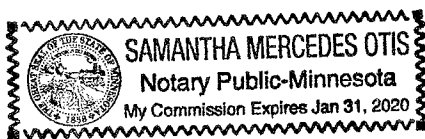
FURTHER YOUR AFFIANT SAYETH NOT.


MICHAEL TESSNEER

Subscribed and sworn to before me on

March 15th, 2019


NOTARY PUBLIC



UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

James and Lorie Jensen, et al.,

Case No. 09-cv-01775 DWF/BRT

Plaintiffs,

vs.

**AFFIDAVIT OF MARK BROSTROM
CONCERNING VERIFICATION OF
MARCH 2019 SUMMARY REPORT**

Minnesota Department of Human
Services, et al.,

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF ISANTI)

I, MARK BROSTROM, being first duly sworn on oath, states as follows:

1. I am employed by the Minnesota Department of Human Services (DHS) as Manager, Minnesota Life Bridge Treatment Homes.

2. I am familiar with the above-captioned case and settlement and understand that this affidavit is a verification of information set forth in the March 2019 Summary Report (Report).

3. I have personal knowledge of the information in the following sections of the Report and verify that the data therein is reliable and valid and that the statements therein are accurate, correct and timely:


a. July 1, 2018 to December 31, 2018 Updates regarding Evaluation Criteria

2, 3, 47, 48, 49, 50, 51, 52, 53, and 64;

- b. January 1, 2018 to December 31, 2018 Updates regarding Evaluation Criteria 1, 4, 38, 45, 46, 54, 55, 56, 57, 58, 59, 60, 61, 62, 65, 66, 89, 90, 91, 92, 94, and 96; and
- c. the historical and current information regarding Evaluation Criteria 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 40, 63, and 88.

4. I further hereby verify the data contained in the portions of the Report described above at paragraph 3 is either (1) public data under applicable laws, or (2) if it is not public data, the data subject(s) of any such not-public data have consented to such data being used publicly, or (3) I have alerted QADC Services at DHS so that the data can be filed under seal.

FURTHER YOUR AFFIANT SAYETH NOT.



MARK BROSTROM

Subscribed and sworn to before me on

March 15, 2019



NOTARY PUBLIC

