

STATE OF MINNESOTA
COUNTY OF RAMSEY

DISTRICT COURT
SECOND JUDICIAL DISTRICT

Case Type: Civil Other

Court File No. 62-CV-14-6991

In re the Matter of Community Action of
Minneapolis, Inc.

**SUPPLEMENTAL AFFIDAVIT OF JULIA
DAYTON KLEIN IN SUPPORT OF THE
PETITION TO APPOINT RECEIVER BY
THE MINNESOTA DEPARTMENT OF
HUMAN SERVICES AND THE
MINNESOTA DEPARTMENT OF
COMMERCE**

STATE OF MINNESOTA)
) ss
COUNTY OF RAMSEY)

I, Julia Dayton Klein, being first duly sworn, depose and say as follows:

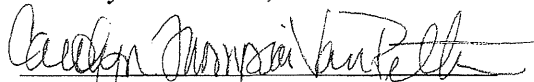
1. I submit this supplemental affidavit in support of the Petition to Appoint Receiver by the Minnesota Department of Human Services and the Minnesota Department of Commerce.
2. I am the General Counsel of the Minnesota Department of Commerce ("Department").
3. I have discussed with an attorney from the Minnesota Department of Human Services potential receivers and the eligibility requirements of Minn. Stat. § 576.26. The Department and the Minnesota Department of Human Services agree to propose the receiver identified in this affidavit for the court to consider for appointment as receiver over Community Action of Minneapolis.
4. The Department and the Minnesota Department of Human Services believe that the proposed receiver identified in this affidavit meets the requirements of Minn. Stat. § 576.26 because it is (1) qualified to serve as a receiver and as an officer of the court, and (2) independent as to the parties and the underlying dispute.
5. The proposed receiver included in this affidavit has agreed to serve as receiver over Community Action of Minneapolis, if the court makes such an appointment.
6. The Department and the Minnesota Department of Human Services jointly propose BGA Management, LLC, d/b/a Alliance Management ("Alliance") for the court to consider appointing as receiver. Alliance's principal, Michael Knight, would be responsible for overseeing the receivership.

7. Alliance is a business consulting firm specializing in providing receivership, interim management, turnaround work, management consulting and financial advisory to companies throughout the United States. (See Affidavit of Michael Knight).
8. Alliance is staffed with qualified financial and business management professionals and possesses the experience to perform all of the functions of a receiver. Further, Alliance indicated that all of its professionals who would serve on this case have worked on receivership matters in the past. Alliance agreed that it would charge no more than the discounted rates of \$335 per hour for senior consultant and principal work or \$250 per hour for associate work for its receivership services. (See Affidavit of Michael Knight).

Further your affiant sayeth not.


JULIA DAYTON KLEIN

Subscribed and sworn to before me this
21st day of October, 2014


NOTARY PUBLIC

