

EXHIBIT K

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**GEORGIA LATINO ALLIANCE *
FOR HUMAN RIGHTS, et al., ***

Plaintiffs, *

V. *

1:11-CV-1804-TWT

**NATHAN DEAL, Governor of the *
State of Georgia, et al., ***

Defendants. *

AFFIDAVIT OF GIA COMPTON

Personally appears before me, the undersigned officer duly authorized to administer oath in and for the State of Georgia, Gia Compton, who, after being duly sworn, deposes and states his oath as follows:

1.

My name is Gia Compton. I am *sui juris* and competent to testify in this matter and under no civil or legal disability. I give this Affidavit as evidence in the above-styled action and for any lawful purpose. I make this Affidavit based on my personal knowledge of its contents.

2.

I am a Deputy Chief of the Medicaid Division within the Georgia Department of Community Health (DCH). I have held this position since

February 2008. In my position, I am charged with overseeing that the policies and state plan for the Georgia Medicaid Program are compliant with state and federal laws, rules and regulations. Based upon the position I hold and the duties incumbent therein, I am familiar with the amounts paid by the State for various Medicaid-related services.

3.

DCH tracks many different kinds of Medicaid expenses, including Medicaid expenses incurred by illegal immigrants. Although illegal immigrants are not entitled to most Medicaid services, they are entitled to Medicaid payments for emergency medical assistance. The state share of such expenses is 50%.

4.

In FY 2007, total Medicaid paid claims reimbursed in Georgia for illegal immigrants were \$31,922,225.69. In FY 2008, total Medicaid expenses incurred in Georgia by illegal immigrants were \$23,795,818.47.

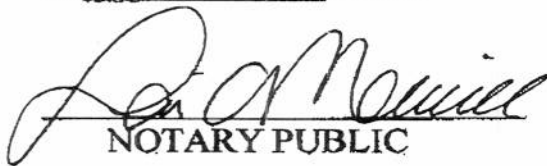
In FY 2009, total Medicaid expenses incurred in Georgia by illegal immigrants were \$25,876,282.60. In FY 2010, total Medicaid expenses incurred in Georgia by illegal immigrants were \$28,601,668.82. In FY 2011, Medicaid expenses to date incurred in Georgia by illegal immigrants are \$53,234,092.15. The State of Georgia was responsible for 50% of each of these amounts.

Further Affiant Saith Not.



Gia Compton

Sworn to and prescribed
before me this 16th day
of June, 2011.



NOTARY PUBLIC



My commission expires: