## E-FILED 2023 JAN 30 6:38 AM WEBSTER - CLERK OF DISTRICT COURT

## AFFIDAVIT OF SAM HAIKINS

- I, Sam Haikins, being first duly sworn, on oath, depose and state:
- 1. I am President and Indirect Owner of Blue Care Propco Fort Dodge North, LLC, d/b/a Webster Post Acute Rehabilitation ("QHC Fort Dodge"); Blue Care PropCo Winterset East, LLC, d/b/a Madison Wellness and Rehabilitation ("QHC Winterset"); Blue Care PropCo Maquoketa, LLC, d/b/a Timber City Wellness and Rehabilitation ("QHC Crestridge"); Blue Care PropCo Humboldt North, LLC, d/b/a Humboldt Wellness and Rehabilitation ("QHC Humboldt"). Each of the aforementioned entities is a health care facility licensed in the State of Iowa pursuant to Iowa Code chapter 135C. I am also President and Indirect Owners of Blue Care Propco Fort Dodge, LLC, d/b/a Villages Cottages Assisted Living ("QHC Village Cottages) and Blue Care Propco Winterset West, d/b/a Madison Square Assisted Living ("QHC Madison Square"), assisted living programs certified in the State of Iowa pursuant to Iowa Code chapter 231C.
- 2. Blue Care Opco Holdings, LLC, Blue Care Homes, LLC, and Blue Care Investments, LLC are all owners, either fully or indirectly, of the entities identified in paragraph 1.
- 3. We are unable to continue to fund the entities identified in paragraph 1 to assure the health, safety, and well-being of the residents during a voluntary closure process. We thus acquiesce to the appointment of a receiver for any or all of the entities identified in paragraph 1, whether under Iowa Code chapter 135C or other applicable law.

Sam Haikins

Subscribed and sworn to before me this \_\_\_\_ day of January, 2023.

Notary Public In and For The State of

AARON KOSLOWITZ
NOTARY PUBLIC OF NEW JERSEY
Commission # 50124159
My Commission Expires 3/3/2025