
Smith Economics Group, Ltd.

A Division of Corporate Financial Group
Economics / Finance / Litigation Support

April 18, 2025

Stan V. Smith, Ph.D.
President

Mr. Christopher Stoller
415 Wesley Ave Apt. 1
Oak Park, IL 60302

Re: Second Updated Past Wage Calculation

Dear Mr. Stoller:

You have asked me to calculate the loss of wages to Christopher Stoller from May 22, 2023 through April 20, 2025.

Based on the Salary Earnings Statement dated February 28, 2023, Mr. Stoller's hourly rate was \$17.25 per hour for regular hours and \$25.88 per hour for overtime hours. Based on information obtained from the SEIU HCII website found at www.seiuhcilin.org, the article "DORS Home Care Contract Approved by Members!" dated April 20, 2024, includes Major Contract Highlights Between SEIU Healthcare (HCII) & DHS/ORS for July 1, 2023 through June 30, 2027, with wage increases of \$17.75 effective "upon federal approval", \$18.25 effective January 1, 2025, \$18.75 effective July 1, 2025, \$19.50 effective January 1, 2026, \$20.00 effective July 1, 2026, and \$20.75 effective January 1, 2027. Based on the article, "DORS Contract Update: Raises & PTO" dated August 6, 2024, the first raise to \$17.75 per hour went into effect on August 1, 2024.

According to Illinois Department of Human Rights letter dated February 22, 2024, Christopher Stoller cared for Michael Stoller 15 hour per day, which is 105 hours per week. Assuming 40 regular hours per week, this results in 65 hours of overtime per week.

Based on Christopher Stoller's hourly rate and hours, his weekly pay is estimated to be \$2,372.50 through July 31, 2024, \$2,440.95 from August 1, 2024 through December 31, 2024, and \$2,509.70 effective January 1, 2025.

Based on the above assumptions, the total loss of wages from May 22, 2023 through April 20, 2025 is \$240,850.89 ▶ Table 1U2.

In addition to lost wages, it is my understanding that Christopher Stoller is entitled to interest on his lost wages based on 735 ILCS 5/2-1303, which indicates an interest rate of 6 percent per year when the debtor is a local government. I calculate the interest on the cumulate wages starting the week after the wages are accrued at a weekly interest rate of 0.115 percent. Based on these assumptions and the weekly wages discussed above, the total interest from May 22, 2023 through April 20, 2025 is \$13,610.74 ▶ Table 1U2.

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The total past wages and interest to Christopher Stoller from May 22, 2023 through April 20, 2025 is \$254,461.64 ► Table 1U2.

If you have any questions, please do not hesitate to call me.

Sincerely,



Stan V. Smith, Ph.D.
President

Table 1U2

BACK WAGES AND INTEREST
MAY 22, 2023 - APRIL 20, 2025

WEEK ENDING	HOURLY RATE	WEEKLY WAGES	WAGES CUMULATE	6% INTEREST INTEREST	INTEREST CUMULATE	WAGES & INTEREST
05/28/23	\$17.25	\$2,371.88	\$2,371.88	\$0.00	\$0.00	\$2,371.88
06/04/23	\$17.25	\$2,371.88	\$4,743.75	\$2.74	\$2.74	\$4,746.49
06/11/23	\$17.25	\$2,371.88	\$7,115.63	\$5.47	\$8.21	\$7,123.84
06/18/23	\$17.25	\$2,371.88	\$9,487.50	\$8.21	\$16.42	\$9,503.92
06/25/23	\$17.25	\$2,371.88	\$11,859.38	\$10.95	\$27.37	\$11,886.74
07/02/23	\$17.25	\$2,371.88	\$14,231.25	\$13.68	\$41.05	\$14,272.30
07/09/23	\$17.25	\$2,371.88	\$16,603.13	\$16.42	\$57.47	\$16,660.60
07/16/23	\$17.25	\$2,371.88	\$18,975.00	\$19.16	\$76.63	\$19,051.63
07/23/23	\$17.25	\$2,371.88	\$21,346.88	\$21.89	\$98.52	\$21,445.40
07/30/23	\$17.25	\$2,371.88	\$23,718.75	\$24.63	\$123.16	\$23,841.91
08/06/23	\$17.25	\$2,371.88	\$26,090.63	\$27.37	\$150.52	\$26,241.15
08/13/23	\$17.25	\$2,371.88	\$28,462.50	\$30.10	\$180.63	\$28,643.13
08/20/23	\$17.25	\$2,371.88	\$30,834.38	\$32.84	\$213.47	\$31,047.84
08/27/23	\$17.25	\$2,371.88	\$33,206.25	\$35.58	\$249.05	\$33,455.30
09/03/23	\$17.25	\$2,371.88	\$35,578.13	\$38.31	\$287.36	\$35,865.49
09/10/23	\$17.25	\$2,371.88	\$37,950.00	\$41.05	\$328.41	\$38,278.41
09/17/23	\$17.25	\$2,371.88	\$40,321.88	\$43.79	\$372.20	\$40,694.08
09/24/23	\$17.25	\$2,371.88	\$42,693.75	\$46.53	\$418.73	\$43,112.48
10/01/23	\$17.25	\$2,371.88	\$45,065.63	\$49.26	\$467.99	\$45,533.61
10/08/23	\$17.25	\$2,371.88	\$47,437.50	\$52.00	\$519.99	\$47,957.49
10/15/23	\$17.25	\$2,371.88	\$49,809.38	\$54.74	\$574.72	\$50,384.10
10/22/23	\$17.25	\$2,371.88	\$52,181.25	\$57.47	\$632.20	\$52,813.45
10/29/23	\$17.25	\$2,371.88	\$54,553.13	\$60.21	\$692.41	\$55,245.53
11/05/23	\$17.25	\$2,371.88	\$56,925.00	\$62.95	\$755.35	\$57,680.35
11/12/23	\$17.25	\$2,371.88	\$59,296.88	\$65.68	\$821.03	\$60,117.91
11/19/23	\$17.25	\$2,371.88	\$61,668.75	\$68.42	\$889.45	\$62,558.20
11/26/23	\$17.25	\$2,371.88	\$64,040.63	\$71.16	\$960.61	\$65,001.23
12/03/23	\$17.25	\$2,371.88	\$66,412.50	\$73.89	\$1,034.50	\$67,447.00
12/10/23	\$17.25	\$2,371.88	\$68,784.38	\$76.63	\$1,111.13	\$69,895.51
12/17/23	\$17.25	\$2,371.88	\$71,156.25	\$79.37	\$1,190.50	\$72,346.75
12/24/23	\$17.25	\$2,371.88	\$73,528.13	\$82.10	\$1,272.60	\$74,800.73
12/31/23	\$17.25	\$2,371.88	\$75,900.00	\$84.84	\$1,357.44	\$77,257.44
01/07/24	\$17.25	\$2,371.88	\$78,271.88	\$87.58	\$1,445.02	\$79,716.89
01/14/24	\$17.25	\$2,371.88	\$80,643.75	\$90.31	\$1,535.33	\$82,179.08
01/21/24	\$17.25	\$2,371.88	\$83,015.63	\$93.05	\$1,628.38	\$84,644.01
01/28/24	\$17.25	\$2,371.88	\$85,387.50	\$95.79	\$1,724.17	\$87,111.67
02/04/24	\$17.25	\$2,371.88	\$87,759.38	\$98.52	\$1,822.69	\$89,582.07
02/11/24	\$17.25	\$2,371.88	\$90,131.25	\$101.26	\$1,923.96	\$92,055.21
02/18/24	\$17.25	\$2,371.88	\$92,503.13	\$104.00	\$2,027.95	\$94,531.08
02/25/24	\$17.25	\$2,371.88	\$94,875.00	\$106.73	\$2,134.69	\$97,009.69
03/03/24	\$17.25	\$2,371.88	\$97,246.88	\$109.47	\$2,244.16	\$99,491.03
03/10/24	\$17.25	\$2,371.88	\$99,618.75	\$112.21	\$2,356.37	\$101,975.12
03/17/24	\$17.25	\$2,371.88	\$101,990.63	\$114.94	\$2,471.31	\$104,461.94
03/24/24	\$17.25	\$2,371.88	\$104,362.50	\$117.68	\$2,588.99	\$106,951.49
03/31/24	\$17.25	\$2,371.88	\$106,734.38	\$120.42	\$2,709.41	\$109,443.79
04/07/24	\$17.25	\$2,371.88	\$109,106.25	\$123.16	\$2,832.57	\$111,938.82
04/14/24	\$17.25	\$2,371.88	\$111,478.13	\$125.89	\$2,958.46	\$114,436.58
04/21/24	\$17.25	\$2,371.88	\$113,850.00	\$128.63	\$3,087.09	\$116,937.09
04/28/24	\$17.25	\$2,371.88	\$116,221.88	\$131.37	\$3,218.45	\$119,440.33
05/05/24	\$17.25	\$2,371.88	\$118,593.75	\$134.10	\$3,352.55	\$121,946.30
05/12/24	\$17.25	\$2,371.88	\$120,965.63	\$136.84	\$3,489.39	\$124,455.02
05/19/24	\$17.25	\$2,371.88	\$123,337.50	\$139.58	\$3,628.97	\$126,966.47
05/26/24	\$17.25	\$2,371.88	\$125,709.38	\$142.31	\$3,771.28	\$129,480.66
06/02/24	\$17.25	\$2,371.88	\$128,081.25	\$145.05	\$3,916.33	\$131,997.58
06/09/24	\$17.25	\$2,371.88	\$130,453.13	\$147.79	\$4,064.12	\$134,517.24

Table 1U2

BACK WAGES AND INTEREST
MAY 22, 2023 - APRIL 20, 2025

WEEK ENDING	HOURLY RATE	WEEKLY WAGES	WAGES CUMULATE	6% INTEREST	INTEREST CUMULATE	WAGES & INTEREST
06/16/24	\$17.25	\$2,371.88	\$132,825.00	\$150.52	\$4,214.64	\$137,039.64
06/23/24	\$17.25	\$2,371.88	\$135,196.88	\$153.26	\$4,367.90	\$139,564.77
06/30/24	\$17.25	\$2,371.88	\$137,568.75	\$156.00	\$4,523.90	\$142,092.65
07/07/24	\$17.25	\$2,371.88	\$139,940.63	\$158.73	\$4,682.63	\$144,623.25
07/14/24	\$17.25	\$2,371.88	\$142,312.50	\$161.47	\$4,844.10	\$147,156.60
07/21/24	\$17.25	\$2,371.88	\$144,684.38	\$164.21	\$5,008.31	\$149,692.68
07/28/24	\$17.25	\$2,371.88	\$147,056.25	\$166.94	\$5,175.25	\$152,231.50
08/04/24	\$17.54	\$2,411.16	\$149,467.41	\$169.68	\$5,344.93	\$154,812.34
08/11/24	\$17.75	\$2,440.63	\$151,908.04	\$172.46	\$5,517.39	\$157,425.43
08/18/24	\$17.75	\$2,440.63	\$154,348.66	\$175.28	\$5,692.67	\$160,041.33
08/25/24	\$17.75	\$2,440.63	\$156,789.29	\$178.09	\$5,870.76	\$162,660.05
09/01/24	\$17.75	\$2,440.63	\$159,229.91	\$180.91	\$6,051.68	\$165,281.59
09/08/24	\$17.75	\$2,440.63	\$161,670.54	\$183.73	\$6,235.40	\$167,905.94
09/15/24	\$17.75	\$2,440.63	\$164,111.16	\$186.54	\$6,421.95	\$170,533.11
09/22/24	\$17.75	\$2,440.63	\$166,551.79	\$189.36	\$6,611.30	\$173,163.09
09/29/24	\$17.75	\$2,440.63	\$168,992.41	\$192.18	\$6,803.48	\$175,795.89
10/06/24	\$17.75	\$2,440.63	\$171,433.04	\$194.99	\$6,998.47	\$178,431.51
10/13/24	\$17.75	\$2,440.63	\$173,873.66	\$197.81	\$7,196.28	\$181,069.94
10/20/24	\$17.75	\$2,440.63	\$176,314.29	\$200.62	\$7,396.90	\$183,711.19
10/27/24	\$17.75	\$2,440.63	\$178,754.91	\$203.44	\$7,600.34	\$186,355.25
11/03/24	\$17.75	\$2,440.63	\$181,195.54	\$206.26	\$7,806.60	\$189,002.13
11/10/24	\$17.75	\$2,440.63	\$183,636.16	\$209.07	\$8,015.67	\$191,651.83
11/17/24	\$17.75	\$2,440.63	\$186,076.79	\$211.89	\$8,227.56	\$194,304.34
11/24/24	\$17.75	\$2,440.63	\$188,517.41	\$214.70	\$8,442.26	\$196,959.67
12/01/24	\$17.75	\$2,440.63	\$190,958.04	\$217.52	\$8,659.78	\$199,617.82
12/08/24	\$17.75	\$2,440.63	\$193,398.66	\$220.34	\$8,880.12	\$202,278.78
12/15/24	\$17.75	\$2,440.63	\$195,839.29	\$223.15	\$9,103.27	\$204,942.55
12/22/24	\$17.75	\$2,440.63	\$198,279.91	\$225.97	\$9,329.24	\$207,609.15
12/29/24	\$17.75	\$2,440.63	\$200,720.54	\$228.78	\$9,558.02	\$210,278.56
01/05/25	\$18.11	\$2,489.73	\$203,210.27	\$231.60	\$9,789.62	\$212,999.89
01/12/25	\$18.25	\$2,509.38	\$205,719.64	\$234.47	\$10,024.10	\$215,743.74
01/19/25	\$18.25	\$2,509.38	\$208,229.02	\$237.37	\$10,261.46	\$218,490.48
01/26/25	\$18.25	\$2,509.38	\$210,738.39	\$240.26	\$10,501.73	\$221,240.12
02/02/25	\$18.25	\$2,509.38	\$213,247.77	\$243.16	\$10,744.89	\$223,992.66
02/09/25	\$18.25	\$2,509.38	\$215,757.14	\$246.06	\$10,990.94	\$226,748.09
02/16/25	\$18.25	\$2,509.38	\$218,266.52	\$248.95	\$11,239.89	\$229,506.41
02/23/25	\$18.25	\$2,509.38	\$220,775.89	\$251.85	\$11,491.74	\$232,267.63
03/02/25	\$18.25	\$2,509.38	\$223,285.27	\$254.74	\$11,746.48	\$235,031.75
03/09/25	\$18.25	\$2,509.38	\$225,794.64	\$257.64	\$12,004.12	\$237,798.76
03/16/25	\$18.25	\$2,509.38	\$228,304.02	\$260.53	\$12,264.65	\$240,568.67
03/23/25	\$18.25	\$2,509.38	\$230,813.39	\$263.43	\$12,528.08	\$243,341.47
03/30/25	\$18.25	\$2,509.38	\$233,322.77	\$266.32	\$12,794.40	\$246,117.17
04/06/25	\$18.25	\$2,509.38	\$235,832.14	\$269.22	\$13,063.62	\$248,895.76
04/13/25	\$18.25	\$2,509.38	\$238,341.52	\$272.11	\$13,335.73	\$251,677.25
04/20/25	\$18.25	\$2,509.38	\$240,850.89	\$275.01	\$13,610.74	\$254,461.64
TOTAL			\$240,850.89		\$13,610.74	\$254,461.64

Hourly Rate:	\$17.25	Hourly Rate:	\$17.75	Hourly Rate:	\$18.25
Regular Hours:	40	Regular Hours:	40	Regular Hours:	40
Weekly Regular Pay:	\$690.00	Weekly Regular Pay:	\$710.00	Weekly Regular Pay:	\$730.00
Overtime Rate:	\$25.88	Overtime Rate:	\$26.63	Overtime Rate:	\$27.38
Overtime Hours:	65	Overtime Hours:	65	Overtime Hours:	65
Overtime Pay:	\$1,682.20	Overtime Pay:	\$1,730.95	Overtime Pay:	\$1,779.70
Total Weekly Pay:	\$2,372.20	Total Weekly Pay:	\$2,440.95	Total Weekly Pay:	\$2,509.70