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CITY AND COUNTY OF SAN FRANCISCO

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 CITY AND COUNTY OF SAN  
18 FRANCISCO,

19 Plaintiff,

20 vs.

21 ALEX M. AZAR II, Secretary of U.S.  
22 Department of Health and Human Services;  
23 ROGER SEVERINO, Director, Office for  
24 Civil Rights, Department of Health and Human  
25 Services; U.S. DEPARTMENT OF HEALTH  
AND HUMAN SERVICES; and DOES 1-25,

26 Defendants.

Case No. 3:19-cv-2405-JCS

**DECLARATION OF CHRISTINE SIADOR IN  
SUPPORT OF CITY AND COUNTY OF SAN  
FRANCISCO'S MOTION FOR  
PRELIMINARY INJUNCTION**

Hearing Date: July 12, 2019

Time: 10:30 a.m.

Judge: Hon. Joseph C. Spero

Place: Courtroom G, 15th Floor

Trial Date: Not set

1 I, Christine Siador, declare as follows:

2 1. I have personal knowledge of the facts set forth in this declaration and, if called as a  
3 witness, could and would testify competently to the matters set forth below.

4 2. I am the Deputy Director of the Population Health Division and the Director of the  
5 Office of Operations, Finance & Grants Management in the San Francisco Department of Public  
6 Health (“SFDPH”).

7 3. The SFDPH Population Health Division (“PHD”) receives approximately \$2.5 million  
8 in federal funding from the U.S. Department of Health and Human Services (“HHS”) for public health  
9 research including randomized clinical trials focused on HIV and substance use.

10 4. For example, PHD’s HIV research unit, Bridge HIV—which has been at the vanguard  
11 of HIV prevention science since the beginning of the HIV epidemic and is a recognized global leader  
12 in HIV prevention research—is 100% grant funded, primarily through the HHS National Institutes of  
13 Health (“NIH”).

14 5. Bridge HIV’s work touches HIV prevention efforts at the highest levels; national health  
15 entities, such as the Centers for Disease Control and Prevention (“CDC”) draw upon the data that  
16 comes from its trials to create guidelines to stop the spread of HIV. Bridge HIV provides evidence  
17 that directly informs public health practice decisions. For example, Bridge HIV participated in the  
18 landmark trial that demonstrated the safety and efficacy of using antiretroviral medicine for HIV  
19 prevention in healthy people who are at risk of HIV infections. This prevention strategy is known as  
20 pre-exposure prophylaxis (“PrEP”). PrEP has changed the landscape of HIV prevention. In fact, the  
21 Getting to Zero San Francisco Consortium has adopted PrEP as one of the key strategies to achieve its  
22 immediate goal of reducing both HIV infections and HIV deaths by 90% from their 2013 levels by the  
23 year 2020.

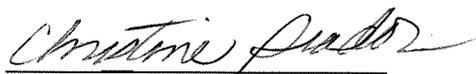
24 6. None of this would have been possible without funding from HHS—and future life-  
25 saving breakthroughs will be jeopardized if these funds are terminated.

26 7. Similarly, SFDPH’s Disease Prevention and Control Branch (“DPC”) oversees public  
27 health clinical, laboratory and disease intervention services. It performs many of the legally mandated  
28 activities intended to protect public health and therefore serves everyone in San Francisco. This

1 Branch is also responsible for informing and guiding San Francisco clinicians in best practices for  
2 communicable and chronic disease prevention and is a resource for expert clinical and laboratory  
3 consultation, including control and treatment of communicable diseases during outbreaks. Within  
4 SFPDPH, DPC staff work closely with the San Francisco Health Network to optimize clinical policies  
5 and care in the DPC core areas. In addition, DPC staff work with clinical providers and systems  
6 throughout San Francisco to improve prevention, diagnosis, and treatment of communicable diseases  
7 using a public health detailing model of engagement.

8 8. DPC currently receives over \$15 million in funding from the CDC. Losing these funds  
9 would impact all aspects of the Branch's work and threaten San Francisco's ability to detect, treat, and  
10 prevent diseases such as HIV, STDs, TB, Hepatitis C and other communicable diseases—putting  
11 hundreds of thousands of people at higher risk for illness.

12  
13 I declare under penalty of perjury that the foregoing is true and correct and that this declaration  
14 was executed on June 3, at San Francisco, California.

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17 Christine Siador  
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