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 CITY AND COUNTY OF SAN FRANCISCO

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 15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

17
 18 CITY AND COUNTY OF SAN
 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
 Civil Rights, Department of Health and Human
 24 Services; U.S. DEPARTMENT OF HEALTH
 AND HUMAN SERVICES; and DOES 1-25,

25 Defendants.
 26

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

**DECLARATION OF GREG WAGNER 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, Greg Wagner, 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 Chief Financial Officer for the San Francisco Department of Public Health
5 (“SFPDPH”). I have served in this role since August 2011. Prior to becoming CFO of SFPDPH, I
6 worked in the Mayor’s Office of Public Policy and Finance for five years, and served as the Mayor’s
7 Budget Director from 2009-2011. Prior to joining the Mayor’s Office, I spent several years on the
8 staff of the San Francisco Planning and Urban Research Association, where I led research, policy
9 analysis and advocacy efforts on governance and economic development issues in San Francisco. I
10 hold a Master’s degree in Public Policy from the University of California, Berkeley.

11 3. In Fiscal Year 17-18, SFPDPH expended over \$61 million in HHS grant funds that were
12 used to fund a wide array of critical health care services and public health research. In the same fiscal
13 year, SFPDPH expended \$642,304,232 in Medicaid funds and \$128,336,293 in Medicare funds.

14 4. These funds make up approximately one-third of SFPDPH’s total budget, nearly 40% of
15 Zuckerberg San Francisco General’s budget, and over 60% of the budget for Laguna Honda Hospital.

16 5. If HHS terminated these funds, SFPDPH would have to restructure the entire public
17 health system with a drastic reduction in services. Hospital beds, behavioral health clinics, primary
18 care clinics, and emergency services would all have to be significantly reduced. Hundreds of
19 employees would likely lose their jobs. People in need of urgent and emergent health care may not be
20 able to receive timely services. In short, termination of all HHS funds would cause a loss of critical
21 health care capacity for San Francisco and the region.

22
23 I declare under penalty of perjury that the foregoing is true and correct and that this declaration
24 was executed on June 3, at San Francisco, California.

25
26 
27 Greg Wagner
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