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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  
 22 ALEX M. AZAR II, Secretary of U.S.  
 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 DR. BARRY ZEVIN 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, Dr. Barry Zevin, 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 Medical Director of Gender Health SF in the San Francisco Department of  
5 Public Health (“SFPDH”). Previously, I served as Medical Director of the Tom Waddell Health  
6 Center where I collaborated in starting Transgender Tuesdays, the first transgender primary care clinic  
7 in the country focused on homeless and other severely underserved individuals who identify as  
8 transgender. I am also an Assistant Clinical Professor of Medicine at University of California, San  
9 Francisco Medical School.

10 3. SFPDH provides a range of health services to transgender residents including primary  
11 and transition-related care. The transition-related services provided by SFPDH includes hormone  
12 therapy, counseling, and surgery. Several transition-related surgeries—such as mammoplasty,  
13 orchiectomy, mastectomy, and hysterectomy—are performed at Zuckerberg San Francisco General  
14 Hospital.

15 4. In addition, Gender Health SF provides uninsured transgender adult residents access to  
16 transgender surgeries and related education and preparation services. Gender Health SF staff help  
17 clients navigate the transition process, leading to better health outcomes.

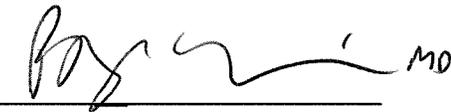
18 5. The transgender community is a highly vulnerable population. Transgender individuals  
19 face unique stressors, including the stress experienced when their gender identity is not affirmed.  
20 Transgender people also experience higher rates of discrimination and harassment than their cisgender  
21 counterparts and, as a result, experience poorer health and mental health outcomes. They are also at a  
22 significantly greater risk for suicide.

23 6. If front-line staff, such as receptionists and call operators, refuse to direct transgender  
24 patients seeking transition-related services to the appropriate department or to schedule appointments  
25 for them, we need to be able to transfer those individuals—involuntarily if necessary—to another  
26 position. If those individuals cannot be transferred, vulnerable individuals will be deterred from  
27 accessing safe transition-related health care. In such circumstances, I have seen individuals turn to  
28 dangerous alternatives like black market hormones and industrial grade silicone injections, which can

1 have dire health consequences. For example, industrial grade silicone injected into the body may  
2 cause respiratory embolism, infections, scleroderma, toxic shock syndrome, granuloma, neuropathy,  
3 lymphadenopathy, rheumatic symptoms, severe autoimmune and connective tissue disorders, and even  
4 death.

5 7. In addition, when transgender individuals are prevented from accessing transition-  
6 related care, their risk of suicide is greatly increased.

7  
8 I declare under penalty of perjury that the foregoing is true and correct and that this declaration  
9 was executed on June 3, at San Francisco, California.

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12 \_\_\_\_\_  
13 Barry Zevin, M.D.