

1 DENNIS J. HERRERA, State Bar #139669
 City Attorney
 2 JESSE C. SMITH, State Bar #122517
 Chief Assistant City Attorney
 3 RONALD P. FLYNN, State Bar #184186
 Chief Deputy City Attorney
 4 YVONNE R. MERÉ, State Bar #173594
 Chief of Complex and Affirmative Litigation
 5 SARA J. EISENBERG, State Bar #269303
 JAIME M. HULING DELAYE, State Bar #270784
 6 Deputy City Attorneys
 City Hall, Room 234
 7 1 Dr. Carlton B. Goodlett Place
 San Francisco, California 94102-4602
 8 Telephone: (415) 554-4633
 Facsimile: (415) 554-4715
 9 E-Mail: sara.eisenberg@sfcityatty.org

10 *Attorneys for Plaintiff*
 CITY AND COUNTY OF SAN FRANCISCO

11 IN THE UNITED STATES DISTRICT COURT
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 13

14 CITY AND COUNTY OF SAN FRANCISCO,
 15 Plaintiff,
 16 vs.
 17 ALEX M. AZAR II, et al.,
 18 Defendants.

19 STATE OF CALIFORNIA, by and through
 ATTORNEY GENERAL XAVIER BECERRA,
 20 Plaintiff,
 21 vs.
 22 ALEX M. AZAR, et al.,
 23 Defendants.

24 COUNTY OF SANTA CLARA et al,
 25 Plaintiffs,
 26 vs.
 27 U.S. DEPARTMENT OF HEALTH AND
 HUMAN SERVICES, et al.,
 28 Defendants.

No. C 19-02405 WHA
Related to
 No. C 19-02769 WHA
 No. C 19-02916 WHA

**DECLARATION OF GREG WAGNER IN
 SUPPORT OF PLAINTIFFS' MOTION
 FOR SUMMARY JUDGMENT AND IN
 SUPPORT OF THEIR OPPOSITION TO
 DEFENDANTS' MOTION TO DISMISS
 OR, IN THE ALTERNATIVE, FOR
 SUMMARY JUDGMENT**

Date: October 30, 2019
 Time: 8:00 AM
 Courtroom: 12
 Judge: Hon. William H. Alsup
 Action Filed: 5/2/2019

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
3 a 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
5 Health ("SFPDPH"). I have served in this role since August 2011. Prior to that, I worked in the
6 Mayor's Office of Public Policy and Finance for five years, and served as the Mayor's Budget
7 Director from 2009-2011. Prior to joining the Mayor's Office, I spent several years on the staff
8 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.
10 I 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
12 were used to fund a wide array of critical health care services and public health research. In the
13 same fiscal year, SPDPH expended \$642,304,232 in Medicaid funds and \$128,336,293 in
14 Medicare funds.

15 4. These funds make up approximately one-third of SFPDPH's total budget, nearly
16 40% of Zuckerberg San Francisco General's budget, and over 60% of the budget for Laguna
17 Honda Hospital.

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

24 I declare under penalty of perjury that the foregoing is true and correct and that this
25 declaration was executed on September ____, at San Francisco, California.

26  7/6/19
27 Greg Wagner
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