

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

MAYOR AND CITY COUNCIL OF BALTIMORE,

*Plaintiff,*

vs.

ALEX M. AZAR, II, in his official capacity as  
SECRETARY OF HEALTH AND HUMAN  
SERVICES; and U.S. DEPARTMENT OF HEALTH  
AND HUMAN SERVICES,

*Defendants.*

Case No. 1:19-cv-01672

DECLARATION OF SUZANNE SANGREE IN  
SUPPORT OF PLAINTIFF'S OPPOSITION TO  
DEFENDANTS' CONSOLIDATED  
MEMORANDUM OF LAW IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS OR, IN  
THE ALTERNATIVE, MOTION FOR  
SUMMARY JUDGMENT; (2) MEMORANDUM  
OF LAW IN SUPPORT OF PLAINTIFF'S  
MOTION FOR SUMMARY JUDGMENT; AND  
(3) REPLY IN SUPPORT OF PLAINTIFF'S  
MOTION FOR PRELIMINARY INJUNCTION

I, Suzanne Sangree, declare that, if called upon, I would testify to the following:

1. I am a member of the Maryland State Bar, admitted to practice before this Court, employed by the Baltimore City Department of Law as Senior Public Safety Counsel and Director of Affirmative Litigation, and am counsel to Plaintiff in this action. I submit this Declaration in support of Plaintiffs' motion for a preliminary injunction and cross-motion for summary judgment, and in opposition to Defendants' motion to dismiss and for summary judgment.

2. Attached to this Declaration are true and correct copies of the following numbered exhibits, including parts of the administrative record produced by Defendants in this action (AR):

3. Attached hereto as Exhibit 1 is a true and correct copy of Sanger-Katz, *Trump Administration Strengthens 'Conscience Rule' for Health Care Workers*, N.Y. Times, 2018, <http://www.nytimes.com/2019/05/02/upshot/conscience-rule-trump-religious-exemption-health-care.html> (last accessed Sept. 18, 2019).

4. Attached hereto as Exhibit 2 is a true and correct copy of a list compiled by counsel for Plaintiff of 226 complaints in the AR relating to vaccinations and, thus, by HHS's admission outside the scope of the Federal Conscience Statutes.

5. Attached hereto as Exhibit 3 is a true and correct copy of AR542627-542634.

6. Attached hereto as Exhibit 4 is a true and correct copy of AR543082-543089.

7. Attached hereto as Exhibit 5 is a true and correct copy of AR543879-543882.

8. Attached hereto as Exhibit 6 is a true and correct copy of AR544035-544042.

9. Attached hereto as Exhibit 7 is a true and correct copy of AR544235.

10. Attached hereto as Exhibit 8 is a true and correct copy of AR544753-544760.

11. Attached hereto as Exhibit 9 is a true and correct copy of AR542414-542421.

12. Attached hereto as Exhibit 10 is a true and correct copy of AR542449-542456.

13. Attached hereto as Exhibit 11 is a true and correct copy of AR541967-541968.

14. Attached hereto as Exhibit 12 is a true and correct copy of AR541805-541806.

15. Attached hereto as Exhibit 13 is a true and correct copy of AR67173-67175.

16. Attached hereto as Exhibit 14 is a true and correct copy of AR71138-71143.

17. Attached hereto as Exhibit 15 is a true and correct copy of AR137905-137910.

18. Attached hereto as Exhibit 16 is a true and correct copy of AR137920-137941.

19. Attached hereto as Exhibit 17 is a true and correct copy of AR138102-140277.

20. Attached hereto as Exhibit 18 is a true and correct copy of AR140265.

21. Attached hereto as Exhibit 19 is a true and correct copy of AR140350-140356.
22. Attached hereto as Exhibit 20 is a true and correct copy of AR140484-140489.
23. Attached hereto as Exhibit 21 is a true and correct copy of AR147746-147766.
24. Attached hereto as Exhibit 22 is a true and correct copy of AR147824-140489.
25. Attached hereto as Exhibit 23 is a true and correct copy of AR160751-160771.
26. Attached hereto as Exhibit 24 is a true and correct copy of AR140667-140676.
27. Attached hereto as Exhibit 25 is a true and correct copy of AR137857-137862.
28. Attached hereto as Exhibit 26 is a true and correct copy of AR139354-139358.
29. Attached hereto as Exhibit 27 is a true and correct copy of AR139547-139553.
30. Attached hereto as Exhibit 28 is a true and correct copy of AR140153-140159.
31. Attached hereto as Exhibit 29 is a true and correct copy of AR139287-139293.
32. Attached hereto as Exhibit 30 is a true and correct copy of AR140507-140513.
33. Attached hereto as Exhibit 31 is a true and correct copy of AR135450-135459.
34. Attached hereto as Exhibit 32 is a true and correct copy of AR66545-66556.
35. Attached hereto as Exhibit 33 is a true and correct copy of AR55806-55813.
36. Attached hereto as Exhibit 34 is a true and correct copy of AR135824-135840.
37. Attached hereto as Exhibit 35 is a true and correct copy of AR140153-140159.
38. Attached hereto as Exhibit 36 is a true and correct copy of AR160566-160573.
39. Attached hereto as Exhibit 37 is a true and correct copy of AR160801-160828.
40. Attached hereto as Exhibit 38 is a true and correct copy of AR66037-66047.
41. Attached hereto as Exhibit 39 is a true and correct copy of AR161316-161342.
42. Attached hereto as Exhibit 40 is a true and correct copy of AR137574-137587.
43. Attached hereto as Exhibit 41 is a true and correct copy of AR139587-139593.

44. Attached hereto as Exhibit 42 is a true and correct copy of AR147891-147893.
45. Attached hereto as Exhibit 43 is a true and correct copy of AR57519.
46. Attached hereto as Exhibit 44 is a true and correct copy of AR147890-147892.
47. Attached hereto as Exhibit 45 is a true and correct copy of AR161033-161039.
48. Attached hereto as Exhibit 46 is a true and correct copy of AR55622-55628.
49. Attached hereto as Exhibit 47 is a true and correct copy of AR139925-139929.
50. Attached hereto as Exhibit 48 is a true and correct copy of AR151666-151674.
51. Attached hereto as Exhibit 49 is a true and correct copy of AR67413-67416.
52. Attached hereto as Exhibit 50 is a true and correct copy of AR546807-546808.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on September 19, 2019, in the State of Maryland.

  
Suzanne Sangree