

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

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

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

**DECLARATION OF CHRISTINE  
 SIADOR 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**

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

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

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

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  
3 a 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  
8 million in federal funding from the U.S. Department of Health and Human Services (“HHS”) for  
9 public health 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  
11 vanguard of HIV prevention science since the beginning of the HIV epidemic and is a recognized  
12 global leader in HIV prevention research—is 100% grant funded, primarily through the HHS  
13 National Institutes of Health (“NIH”).

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

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

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

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

8 8. DPC currently receives over \$15 million in funding from the CDC. Losing these  
9 funds would impact all aspects of the Branch's work and threaten San Francisco's ability to  
10 detect, treat, and prevent diseases such as HIV, STDs, TB, Hepatitis C and other communicable  
11 diseases—putting 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  
14 declaration was executed on September 9, at San Francisco, California.

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17 Christine Siador  
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