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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

THE STATE OF CALIFORNIA; THE  
STATE OF DELAWARE; THE STATE OF  
MARYLAND; THE STATE OF NEW  
YORK; THE COMMONWEALTH OF  
VIRGINIA.

Plaintiffs,

V.

**ALEX M. AZAR, II, IN HIS OFFICIAL CAPACITY AS SECRETARY OF THE U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES; U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES; R. ALEXANDER ACOSTA, IN HIS OFFICIAL CAPACITY AS SECRETARY OF THE U.S. DEPARTMENT OF LABOR; U.S. DEPARTMENT OF LABOR; STEVEN MNUCHIN, IN HIS OFFICIAL CAPACITY AS SECRETARY OF THE U.S. DEPARTMENT OF THE TREASURY; U.S. DEPARTMENT OF THE TREASURY; DOES 1-100.**

Defendants,

and,

**THE LITTLE SISTERS OF THE POOR,  
JEANNE JUGAN RESIDENCE; MARCH  
FOR LIFE EDUCATION AND DEFENSE  
FUND,**

### Defendant-Intervenors.

4:17-cv-05783-HSG

**DECLARATION OF WALKER A.  
WILSON**

1 I, WALKER A. WILSON, declare:

2       1. I am the Assistant Secretary of Policy at the North Carolina Department of Health and  
3 Human Services. I was previous the Director of the Health Policy Office at Blue Cross Blue  
4 Shield North Carolina, where I led the team analyzing federal regulations under the Affordable  
5 Care Act.

6       2. The State of North Carolina provides contraceptive coverage through a statewide  
7 Family Planning program funded by multiple sources (Title X, Title V, State money, and TANF).  
8 The goal of the program is to decrease the incidence of unintended pregnancies, reduce cases of  
9 STD/HIV, improve birth outcomes, and improve the overall reproductive health among North  
10 Carolinians. Every effort is made to ensure that families with incomes at or below 100% of the  
11 federal poverty level are given priority in receiving family planning services, including  
12 adolescents.

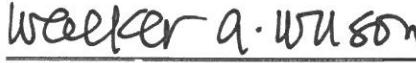
13       3. North Carolina has a minor consent law allowing for a minor to consent to see a  
14 medical professional for the diagnosis, treatment, and prevention of: pregnancies, STDs, mental  
15 health, or substance use.

16       4. North Carolina Medicaid provides family planning coverage to men and women who  
17 have incomes at or below 195% of the federal poverty level through a program called “Be  
18 Smart.” Both public and private medical providers accept “Be Smart” family planning patients.

19       5. All women in North Carolina are at risk of losing Affordable Care Act required  
20 contraceptive coverage under the final regulations issued by the federal government. North  
21 Carolina’s 2017 population is 10,052,564; women make up 5,157,196 of the total population  
22 (according to the American Community Survey 5-year estimate). The percentage of unintended  
23 pregnancies in North Carolina in 2017 was 50.5% (according to the NC State Center for Health  
24 Statistics). As a result of these rules, women will either (a) utilize and seek coverage through  
25 State program, (North Carolina Statewide Family Planning Program), (b) they will forgo  
26 coverage and experience an unintended pregnancy. In both scenarios, the State will suffer  
27 increased costs and its residents harmed.

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1 Executed on December 18, 2018, in Raleigh, North Carolina.

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4 WALKER A. WILSON  
5 Assistant Secretary for Policy  
6 North Carolina Department of Health and  
7 Human Services  
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