

# **EXHIBIT A**

**SUPPLEMENTAL DECLARATION OF KAHSSAY GHEBREBRHAN**

I, Kahssay Ghebrebrhan, declare:

1. I am over the age of eighteen. I have personal knowledge of the facts stated herein, unless otherwise indicated below, and am competent to testify to them.

2. I am a 63 year-old Black man. I was born and raised in Ethiopia. My primary language is Amharic. When I moved to the United States, I only knew a few words of English. I never went to language school or took English lessons. I taught myself English by watching television, reading, and talking with my customers. I use every opportunity to practice and improve my English. I am able to hold simple conversations in English, but prefer an Amharic interpreter for longer or more technical conversations.

3. Before the pandemic, OTR moved all of its systems online, removing the option of renewing licenses or filing tax returns through an in-person visit to their offices. Prior to this change, I had conducted all of my business with OTR through office visits for over 20 years. It is difficult for me to access any of DCRA or OTR's online platforms. I do not own a computer and am not technologically savvy. When I try to call a DC agency, they do not understand me or no one answers the phone. That is why I prefer to go in-person. I do not usually request an interpreter, because these are simple conversations

4. I have faced a constant runaround in my interactions with DC government agencies. In 2022, I visited DCRA (now DLCP, the Department of Licensing and Consumer Protection) several times to get more information on the status of my vending license and outstanding balance. DCRA would tell me to go to the Office of Tax and Revenue (OTR). I would go to OTR, and they would tell me to go to DCRA. This back and forth was incredibly frustrating.

5. At one visit, I went with a staff member from Beloved Community Incubator (BCI). We were told that I had to do everything online and could not do anything in person, as offices were closed. I explained to the agency representative that I had struggled with communicating over the phone and access to technology. Instead of helping me, the representative laughed in my face

and sent me away. I left the office in tears. In that moment, and throughout my interactions with DCRA and OTR, I felt so disrespected. I did not feel like anyone in the DC government cared about the little guy.

6. At this same visit, we tried to determine exactly how much I owed in outstanding taxes. OTR told us that the amounts owed were due to unpaid minimum quarterly sales taxes from 2018 and 2019. However, OTR was unable to provide us with any written statement of the exact amount owed.

7. After this visit, BCI connected me with the Washington Lawyers' Committee for Civil Rights and Urban Affairs (Committee). A Committee attorney and I visited OTR to get more clarity on my outstanding balance. We were able to determine that OTR had misapplied several of my 2018 quarterly street vending payments to the wrong quarters. The Committee attorney assisted me in reducing and clearing errors related to my 2018 taxes, penalties, and interest.

8. A Committee attorney also assisted me in resetting my account with OTR's online account system. However, the portal is only in English and not available in my native language, Amharic.

9. Sometime in 2023, I visited OTR again with attorneys from the Committee. We requested that any outstanding returns for after my license expired be removed. We were provided an email contact to assist in this removal process, however, I never received a response back.

10. It took me more than a year's time, during which I repeatedly went in-person to DCRA and OTR, on my own and with advocates and attorneys, to sort out exactly how much I owed in outstanding taxes. The entire experience has been exhausting and demoralizing.

11. I, and other vendors, have worked with Beloved Community Incubator (BCI) to transform DC's street vending laws and remove some of the problematic provisions that penalize vendors for unpaid debts without an attempt to see whether the vendor has the ability to pay. I was active in the fall of 2022 in advocating on behalf of the Street Vending Decriminalization

Act of 2021 and the Vending Zones Amendment Act of 2021. An important part of this legislation is the amnesty for an unpaid civil citation, or unpaid minimum sales tax, for vendors who accrued fines or fees accrued from 2010 through the effective date of the act.

12. It was my hope that the DC Council would act quickly in Spring 2023 to authorize emergency relief under the amnesty. It is my understanding that this is not the case and the amnesty program will begin in October 2023, at the earliest.

13. While I now know the amount of my outstanding debt to the Office of Tax Revenue, I cannot afford to pay any outstanding debts, and continue to be out of work due to the Clean Hands law.

I declare under penalty of perjury that the foregoing is true and correct. I certify that I have reviewed this declaration in Amharic.

This Declaration was signed by me on July 5, 2023, in Washington, D.C.



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Kahssay Ghebrebrhan