

EXHIBIT A

DECLARATION OF SHAWN DARNELL CHEATHAM

I, Shawn Darnell Cheatham, declare that the following is true and correct.

1. I am a 60 year-old Black man. In recent years, I have lived both in the Commonwealth of Virginia and in the District of Columbia. I currently stay at an apartment in Ward 8 in Southeast D.C.
2. My life has had its ups and downs. I have served my country in the U.S. Air Force. I have had the misfortune of being homeless. And, unfortunately, because of a bad decision I made, I have also spent time in prison. I am now trying to become productive again and support myself, but the D.C. “Clean Hands Law” is making this extremely hard to do.
3. I served in the Air Force as a plumbing specialist between 1981 and 1984. I eventually achieved the rank of Airman First Class (E-3) and received an honorable discharge in 1984. In 2015, I was diagnosed with post-traumatic stress disorder and depression, and in 2016 I was placed on 70% military disability. Around this time, I went back to school and got my certification in Building Maintenance through a program at So That Others Might Eat, with the hope of opening my own plumbing and handyman business. I now have an Employer Identification Number (EIN). But for the D.C. Clean Hands Law, I could apply for a small business license and make plans to open my own small plumbing business in the District, supervising other plumbers and using my contacts, plumbing tools, and skills. Because that law first requires me to pay off several thousand dollars of outstanding parking tickets before I can get any small business license, however – something I cannot afford – I currently cannot realize this dream.
4. I moved to D.C. in 2015, after spending some time in prison and, following my release,

in Charlottesville, Virginia. I chose D.C. both because I had plumbers' jobs in D.C. at the time, and because I wanted to get psychological treatment at the local VA hospital.

5. I was homeless when I first moved to D.C. It was during that time when I racked up most of my debt. My first residence in D.C. was the New York Avenue Shelter run by Catholic Charities. I stayed at the shelter for about six months. When I was there, I often found myself sleeping in my car, to protect my tools and for my personal safety. During this time, my car, which was registered in Virginia, was regularly ticketed by the DMV. Many of these tickets were issued to me while I slept. In all, I have 14 tickets, with most of them related to parking while I was homeless and trying to stay safe. In all, I accumulated \$3,070 in parking and traffic tickets and fines, including late and doubling fees, which I remain unable to pay. In 2016, and several times since then, D.C. government officials told me that I can enter into a payment plan if I pay \$2,800 up front. In my current circumstances, this is a sum I simply cannot afford.
6. Thankfully, I now have a vehicle and housing and I am doing all I can to be a productive citizen. I am extremely glad that recent changes to the Clean Hands Law will make it possible to obtain a driver's license. But as long as my debt remains, the Clean Hands Law still makes it impossible for me to open up my small business.
7. Presently, my only income is a monthly \$1600 disability check I receive from the VA, and \$23 in monthly SNAP (food stamps) benefits that I also receive. My rent costs me \$450 per month and my utilities, food, car maintenance, and other necessities, along with money I send to my stepdaughter, who is a college student, take up the rest of my income.
8. In taking away my ability to get an occupational or small business license, the D.C.

government continues to deprive me of my livelihood. I have fought hard to stand on my own feet and not be a burden to society, but the Clean Hands Law truly makes it hard to take care of myself and rebuild my life.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 13, 2023, 2023

Respectfully submitted,


shawn.cheatham (Jun 14, 2023 11:39 EDT)

Shawn Darnell Cheatham