

EXHIBIT B

**DECLARATION OF STEPHANIE CARRINGTON IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

I, Stephanie Carrington, 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 49 years old. I have lived in Washington, DC since 2007.
3. I identify as African American or Black. I am a mother of two children. I am the sole breadwinner in my household of three people.
4. I work as a speech language pathologist, sometimes called a speech therapist. Speech language pathologists diagnose and treat people of all ages with many types of communication and swallowing problems. These include deficits in expressive and receptive language skills, pragmatics, fluency (stuttering), and voice.
5. I wanted to be a speech pathologist since the time when I was first starting my undergraduate degree. While I didn’t complete my undergraduate degree the first time I enrolled, I later completed it and received my Bachelor’s degree in 2011 from the University of Maryland.
6. In 2019, I received my Master’s Degree in speech pathology from the University of the District of Columbia.
7. I am currently a doctoral student at Kean University in New Jersey, and working toward a clinical doctorate in speech-language pathology. This degree prepares speech pathologists to assume advanced clinical roles. My research focuses on implicit bias and power dynamics within the speech therapist profession, and how those dynamics can impact patients. My goal is to finish my doctoral degree in August 2023.
8. When I received my Master’s degree, I became eligible to pursue a license in speech language pathology. I received my provisional license in Maryland in 2019, and my full license in 2021. I received my license in Virginia in 2022.

9. I have worked as a speech therapist in locations in Maryland and Virginia. I currently work at a skilled nursing facility in Alexandria, Virginia, and will also be the Interim Director of Rehabilitation for a skilled nursing facility in Bethesda, Maryland.

10. Despite my having a license in Maryland and Virginia, I am precluded from receiving a license in Washington, DC, where I reside. If I could obtain a license in D.C., I would do so and seek to practice there. I desire to work in D.C. and serve my community.

11. I cannot get a license in DC due to the Clean Hands law. I owe outstanding debt to the government of Washington, DC, from parking tickets and speeding tickets, including red-light cameras. These tickets are from 2016 to the present day. In addition to the tickets, the fines double if they are not paid, so I believe that half of the debt I owe is to the doubling. According to my online portal with the DC Department of Motor Vehicles, I owe over \$5,200.

12. I do not have the ability to pay all of my outstanding debt. Both of my children have been, and are, fully financially dependent on me. I have large student loans, which are currently in deferment. I spend significant time working toward my doctorate degree, time for which I am not paid. Prior to that, I was in school pursuing my Master's degree. Between 2007 and 2018, I held jobs that paid modest salaries - \$48,000 or less annually. In 2019, I made slightly more – in the \$50,000s – before my income dropped dramatically due to the pandemic. At the time, I was working as a speech therapist in the school setting, and the covid-related school closures in 2020 meant that I could not work. Eventually, I was able to do some speech therapy remotely, and then fully returned to work once school buildings reopened. In 2020-2022, I made between \$10,000 and \$30,000 annually.

13. At one point, I asked the Commissioner of my Advisory Neighborhood Commission about payment plan options for paying down the debt. The Commissioner gave me the phone number of a DC government employee to whom I should reach out with my questions. I was told by the DC government employee that, if I paid \$3,000 up front, I could get on a payment plan. I did not have the ability to pay \$3,000 all at once, so I did not proceed with this option.

14. I try to pay down the debt as I am able, paying down one ticket at a time. I intend to keep paying it down as I am able, but I have not been able to completely pay the debt off.

15. I am aware that the Clean Hands law prohibits anyone who owes debt to the government of D.C. from receiving a professional license, including a speech therapist license. For this reason, I know that I cannot currently obtain a job in speech pathology in D.C.—even though I desire to do so—because I cannot obtain the requisite license.

16. I also desire to open a small business in D.C.—specifically, a private practice specializing in the treatment of patients with neurological issues from strokes, heart disease, dementia, and other illnesses. In the future, I would like hire an occupational and physical therapist to work with me and provide these other services to the patients.

17. I have taken concrete steps to open my own private practice in D.C.. On June 4, 2021, before I knew that the Clean Hands law would bar me from obtaining a Small Business License and professional license, I formed a limited liability corporation in DC by obtaining Articles of Incorporation from the District of Columbia Corporations Division. Ex A. Once I learned that I could not work or open a small business in DC, I shifted my plans to open my business in Maryland instead.

18. On March 30, 2022, I filed paperwork to register an LCC under the name of “Careington Speech Therapy Solutions LLC” in Maryland. Ex. B. I also completed a small business seminar sponsored by the U.S. Small Business Administration. The seminar covered, among other things, the steps to establish a small business, including obtaining an SBA loan. My plan is to work at my current job at the rehabilitation hospital in Virginia until I have saved enough money to open my private practice.

19. I would strongly prefer to work in DC, where I live, rather than Maryland. There is a great need for Black speech pathologist therapists in DC. It is very important for speech therapists to be culturally responsive to their patients. For example, a Black speech therapist may have a better linguistic understanding of why a Black student may verbalize thoughts or concepts

in certain ways. I believe that, as a Black speech pathologist, I have a lot to contribute to the DC community.

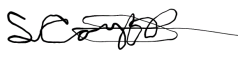
20. I would also prefer to work in DC for economic reasons. I have been told by a representative of the Small Business Administration that DC has more benefits for small business owners, especially minority small business owners, than Maryland does. I understand that, as a Black woman, I would have greater access to educational programs, grants, and other opportunities if I operated a small business in DC.

21. The only reason that I work in Virginia, rather than in DC, and have taken steps to open a business in Maryland, rather than in DC, is due to my being disqualified from obtaining a small business license and professional license by DC’s Clean Hands Law.

22. I am incredibly eager to work as a speech therapist in DC and open my private practice in DC, but due to the Clean Hands Law, I cannot do either one.

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

This Declaration was signed by me on 6/14/2023 at washington, DC (city, state).

DocuSigned by:

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Stephanie Carrington

EXHIBIT A



DEPARTMENT OF CONSUMER & REGULATORY AFFAIRS
District of Columbia Government
 Corporations Division

Articles of Organization for Domestic Limited Liability Company

One or more persons acting as the organizers under the provisions of the Title 29 of D.C. Code (Business Organizations Act) adopt the following Articles of Organization:

First: Company name:
 Careington Speech Therapy LLC

Second: The street address of the initial principal office:
 1212 4th Street SE
 432
 Washington, District of Columbia 20003

Third: Registered agent's name and address in the District of Columbia:
 Stephanie Carrington-Brown
 1212 4th Street SE
 432
 Washington, District of Columbia 20003

Fourth: The company will have one or more series that is treated as a separate entity which limits the debts, obligations, and other liabilities to the assets of a particular series as provided in the operating agreement as authorized by § 29-802.06: Yes

Answer 4A & 4B if answered "Yes"

Fourth A: The limited liability company has at least one member: YES

Fourth B: The date on which a person or persons became the company's initial member or members: 5/31/2021

Fifth: Effective Date: 6/1/2021

Sixth: Miscellaneous Provisions:

Stephanie Carrington-Brown
 Owner & Manager 100% Interest
 Residential Address
 1212 4th Street SE #432
 Washington, DC 20003

Business Address
 1212 4th Street SE #432
 Washington, DC 20003

Careington Speech Therapy will provide speech therapy services targeting communication, swallowing, and cognitive deficits to clients in multiple settings (i.e. school, daycare, home, healthcare) across the lifespan.

Seventh: Organizers Name & Address:

| Name | Address |
|----------------------------|---|
| Stephanie Carrington-Brown | 1212 4th Street SE, 432, Washington, District of Columbia 20003 |

Eighth: Organizers executing this form.

No information provided.

If you sign this form you agree that anyone who makes a false statement can be punished by criminal penalties of a fine up to \$1000, imprisonment up to 180 days, or both, under DCOC § 22-2405;

Amount Paid: \$220.00

Date: 6/4/2021 10:18 PM

E-Signed

EXHIBIT B



**DEPARTMENT OF
ASSESSMENTS AND TAXATION**

Larry Hogan, Governor • Boyd K. Rutherford, Lt. Governor • Michael L. Higgs, Jr., Director

Date: 3/30/2022

STEPHANIE CARRINGTON BROWN
1212 4TH STREET SE 432
WASHINGTON DC DC 20003

THIS LETTER IS TO CONFIRM ACCEPTANCE OF THE FOLLOWING FILING:

ENTITY NAME : Careington Therapy Solutions LLC A/K/A/ Careington Speech Therapy
LLC

DEPARTMENT ID : Z22750368

TYPE OF REQUEST : Non-Maryland Limited Liability Company Registration

DATE FILED : 3/22/2022

TIME FILED : 1:22 PM

FILING NUMBER : 5000000006465743

CUSTOMER ID : 5000923657

WORK ORDER NUMBER : I206600881

PLEASE VERIFY THE INFORMATION CONTAINED IN THIS LETTER. NOTIFY THIS DEPARTMENT IN WRITING IF ANY INFORMATION IS INCORRECT. INCLUDE THE CUSTOMER ID AND THE WORK ORDER NUMBER ON ANY INQUIRIES. EVERY YEAR THIS ENTITY MUST FILE A PERSONAL PROPERTY RETURN IN ORDER TO MAINTAIN ITS EXISTENCE EVEN IF IT DOES NOT OWN PERSONAL PROPERTY. THE RETURN IS FOUND ON THE SDAT WEBSITE.

Department of Assessments and Taxation
301 W. Preston St., Room 801
Baltimore, MD 21201
www.dat.maryland.gov
410-767-1184 (Main) 1-888-246-5941 (Toll-Free)
1-800-735-2258 (Maryland Relay)

EFFECTIVE DATE : 3/22/2022
STATE OF FORMATION : DC
PRINCIPAL OFFICE : 1212 4th Street SE 432
Washington DC DC 20003

RESIDENT AGENT : BisonRattler Limited Liability Company

1722 Tulip Avenue
District Heights MD 20747