

EXHIBIT C

DECLARATION OF MEDHIN AYELE

I, Medhin Ayele, 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 57-year-old Ethiopian woman. I was born and raised in Ethiopia. I immigrated to the United States in 1988. I moved with my then husband to the District of Columbia in 1991 and have lived here ever since. I have lived in the District of Columbia since 1991. I am a resident of Ward 4.
3. I began street vending in D.C. in 1995. Prior to the COVID-19 pandemic, I operated a hotdog stand at 14th Street and Park Road N.W. I sold hot dogs, candy, chips, soda, water, and juice.
4. From 1992 to 2020, I renewed my vending license every two years and never encountered any problems with doing so. While street vending, I operated my cart every weekday, Monday through Friday. Summer was the busiest time of year and when I earned the most money. The work was hard, but I enjoyed being my own boss and having my own business.
5. I worked intermittently in the beginning of 2020. Many people were not going out and I was not selling anything. I finally closed my vending cart in March 2020 due to the COVID-19 pandemic. I believed it was not safe to be outside. I did not consider it feasible to continue vending given lockdown orders, which had driven away my vending customers. It wasn't clear when the pandemic would end, so I continued to rent my cart for \$50 a month and paid \$100 a month to store it at a garage. I also paid an annual fee of \$50 to keep the cart tags current. However, after several years without steady work, I was unable to maintain these fees. I returned the cart in 2022.
6. Because I was not vending due to the COVID-19 pandemic, my vending license expired on September 30, 2020. However, my vending license was not suspended—and the District

continued charge me \$375 quarterly vending fees even after my license had expired. I understand that the only way to prevent those fees from being imposed is to surrender your vending license, which I did not do because I always intended to renew my vending license and resume vending.

7. Now that the COVID-19 emergency measures have been lifted, I desire to begin street vending again—including this summer, which is the busiest season. I attempted to renew my license in October 2020, but the D.C. Department of Consumer and Regulatory Affairs (DCRA) building had a posting that they were closed because of COVID-19. I tried to renew my license in 2021, but was not able to do so because the license desk was closed. In July 2021, I called DCRA to renew my license, as the office was not serving vendors in-person. During this call, I first learned that I owed approximately \$4,800 in pending taxes for the 2020-2022 period and, consequently, could not renew my vending license due to the Clean Hands Law. I returned to DCRA in Summer 2022, to attempt to talk to an D.C. Office of Tax Revenue representative in-person about my license renewal issues.

8. Because my license expired in September 2020, I was able to get my tax liability for 2021 reversed. However, I still owe quarterly street vending taxes for March, June and September 2020. I was not offered a payment plan. I cannot renew my street vending license due to the Clean Hands Law.

9. I went to the Office of Tax Revenue in the spring of 2023 to check on the amount of debt I owe. I am in the process of submitting tax returns in order to determine the precise amount of my debt.

10. Because I am unable to vend given my outstanding debt, I have not held steady work since March of 2020. I applied for unemployment benefits after I stopped working and received \$154 each week. The benefits later increased in amount, and then stopped sometime in fall 2021. I occasionally pick up work at a small grocery store, enough to make a modest amount, but the work is not consistent. It does not provide me with as much income as I would have received

vending. I have not earned enough through this work to pay back my outstanding debt. I live with a relative and her husband, and have been relying on their generosity to make ends meet.

11. I currently cannot afford to pay my debt to D.C.

12. If I could resume my job as a street vendor, I would be able to earn more income. I believe that resuming vending would put me on a path towards economic success, supporting my family, and taking care of my financial obligations. If I cannot continue working as a street vendor due to the Clean Hands Law, in contrast, I will continue to have financial difficulties, including with respect to meeting my financial obligations.

13. The summer is usually the busiest and most lucrative time for street vendors. It is when we get the most business—and I, in turn, earn the most money. I am incredibly eager to go back to work as a street vendor, but due to the Clean Hands Law, I cannot do so.

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 June 14, 2023, in Washington, D.C.

Medhin Ayele

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