

# **EXHIBIT E**

**DECLARATION OF FASIKA MEHABE**

I, Fasika Mehabe, 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 57 years old. I moved from Ethiopia to the D.C. in 1989. I now live with my husband and our two children in Maryland. I identify as Black.
3. I began working as a D.C. street vendor in April 1996. I always worked as a vendor exclusively in D.C. Prior to the pandemic, I sold hot dogs, chips, candy, cookies, and other items on 19th Street NW between L and M St
4. From 1996 to 2020, I renewed my vending license every two years, and never encountered any problems doing so.
5. While street vending, I worked five days per week, Monday through Friday. I typically woke up at 5 am, prepared my cart, worked all day, and then closed my cart at 4:30 pm. I then washed and cleaned my cart before going home. I would typically get home at 6:30 or 7 pm.
6. Despite these 13 or 14 hour work days, I enjoyed being a street vendor. It gave me flexibility in my schedule to take care of my children. I also enjoyed owning my own business and being my own boss.
7. I stopped working as a street vendor in March 2020 due to the pandemic. I did not consider it feasible to continue vending given lockdown orders, which had driven away my vending customers. I also believed it was not safe to be outside.
8. 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.

9. Now that the COVID-19 emergency measures have been lifted, I desire to resume my work as a street vendor—including this summer, which is the busiest season. I tried to renew my license in 2021, but was not able to do so because the license desk was closed. To this end, I tried to renew my vending license in 2022. I went to the DC Department of Licensing and Consumer Protection building. At my appointment, I was told that I owed approximately \$4,856.00 in debt and, consequently, could not renew my vending license due to the Clean Hands Law. I was not offered a payment plan. 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 had full-time, regular work since March of 2020. Through an acquaintance of mine, I picked up work at various hotels in DC, including as a server or dishwasher, making \$19 per hour. None of these jobs have been long-term or full-time employment, and none has provided me with as much income as I would have received vending. I have not earned enough through any of these jobs to pay back my outstanding debt. In addition, in the winter of 2022-2023, the acquaintance who had facilitated these jobs stopped calling me, presumably because he did not have any more work to offer to me. I have not worked since that time. Accordingly, I currently cannot afford to pay my debt to D.C.

11. If I could resume my job as a street vendor, I would be able to earn more income. I believe resuming vending would put me on the 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.

12. 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.

A handwritten signature in black ink, appearing to read 'Fasika Mehabe', is written above a horizontal line.

Fasika Mehabe