

EXHIBIT F

DECLARATION OF HIWET TESFAMICHAEL

I, Hiwet Tesfamichael, 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 70 years old. I moved from Eritrea to the United States in 1984. I have lived in D.C. since 1986 and am a Ward 4 resident. I identify as Black.
3. I began working as a D.C. street vendor in 1991. I always worked as a vendor exclusively in D.C. I most recently worked near the Takoma Park metro station, where my customers were mainly students. Prior to the pandemic, I sold hot dogs, cookies, juice and soda throughout the day, and in the mornings, I sold doughnuts, honeybuns, and muffins.
4. From 1991-2020, I renewed my 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 would arrive at my spot at 5:00 a.m., open my cart at 6:00 a.m., and close at 4:00 p.m. From 4:00 p.m. to 8:00 p.m. I would clean my cart and buy products from whole sales suppliers or from the garage where I stored my cart.
6. Despite working these 15-hour days, I enjoyed being a street vendor. It gave me financial independence and the ability to be my own boss. Owning my own business also allowed me to also have a flexible schedule.
7. I stopped vending in April 2020 due to the pandemic. I did not consider it feasible to continue vending given lockdown orders that prevented students from coming to campus. I also believed


it was not safe to be outside. I did not vend for the remainder of 2020 nor the entirety of 2021 and 2022. I have also not vended for any part of 2023 through today.

8. Because I was not vending due to the COVID-19 pandemic, my vending license expired on September 30, 2021. However, my vending license was not suspended—and the District continued to 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, the busiest time for vendors. To this end, I tried to renew my vending license in 2021 at the D.C. Department Consumer and Regulatory Affairs (DCRA) building. During this visit, a clerk informed me that the agency was not currently renewing licenses, and I was provided with no further information.
10. I returned to the agency, in 2022, to attempt to renew my license again. During this visit I was informed that I owed outstanding debt to D.C. and, therefore, could not renew my vending license. I was not told the total amount of debt I owe to the D.C. government. However, I learned that because I did not physically surrender my expired license, my account was still active and accruing a \$375 quarterly minimum sales tax while I was not working. Due to these charges, I was not allowed to renew my license because of the Clean Hands law. I was not offered a payment plan.
11. In March 2023, I went to the D.C. Office of Tax and Revenue (D.C. OTR) to check the amount of debt I owe. I was told to be able to see my exact amount of debt, I need to first file tax returns for the periods of time I was not working. I am in the process of getting those filed.

12. Because I am unable to vend given my outstanding debt, I have not had long-term, full-time, or regular employment since April 2020. On October 10, 2022, I began working in a hospital kitchen preparing sandwiches and salads. However, this job does not provide me with as much income as I would have received vending. I do not earn enough through this job to pay my outstanding debt.
13. Consequently, I cannot afford to pay my debt to D.C.
14. 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 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.
15. 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.


Hewit Tesfamichael