## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

KEITH CHUNG, 841 Rittenhouse St., NW Washington, DC 20011	) ) )
Plaintiff,	)
v.	) ) ) Case No
THE DISTRICT OF COLUMBIA, Office of the Attorney General 441 4th Street, NW	) ) )
Washington, DC 20001	)
CATHY LANIER, CHIEF OF POLICE, 300 Indiana Avenue NW Washington, DC 20001	) ) )
VINCENT GRAY, MAYOR 1350 Pennsylvania Avenue, NW, Suite 316 Washington, DC 20004	) ) 5 ) )
Defendants.	) ) _)

## **DECLARATION OF KEITH CHUNG**

- 1. I, Keith Chung, am 24 years old and live in Washington D.C. I am employed as a firefighter for the District of Columbia Fire Department. I have worked there for over five years.
- 2. I have been without my car since the police took it on the evening of June 1, 2012.
- 3. My regular schedule at the fire department involves at least two 24-hour shifts per week, plus as much overtime as I can get. This sometimes comes to as much as 72 hours of work per week.

- 4. I am also in school part-time. I am studying to become a licensed paramedic. I have class every Tuesday and Thursday, and on two Saturdays per month.
- 5. I relied on my car in order to get to both work and school. My shifts at work begin at 7:00 a.m. When I had my car, I could wake up at 6:00 a.m. and make it to work on time. Now I have to wake up 4:00 a.m. To get to my home station I have to walk six blocks, catch a bus, and then catch a train. I have to carry two bags with me every day. One has my firefighting equipment, including my mask, hood, boots, coat and other gear, which I estimate adds up to almost 100 pounds. The other bag has a change of clothes, a spare uniform, food, water, and a sleeping bag.
- 6. Not all of my shifts are at my home station. On any given shift, I may be assigned to any of the 33 fire houses in the District. When I am assigned to one of these other station houses I now have to take public transportation from my home station house to my assigned station house. I have to lug my two bags for those trips as well.
- 7. I have a family to support. I live with my elderly grandmother, my mother, who is disabled, my sister, who is pregnant, and my sister's two children. I do my best to support all of them, but that has become harder without my car. I used to be able to drive my grandmother to her medical appointments, take the car to buy groceries for the family, and pick up my niece and nephew from school or camp. Now I have to get help from relatives to do those things, or take public transportation.
- 8. Money is tight. The situation is not helped by the fact that I am paying \$593.34 per month on a loan for a car that I cannot use. In the past I have worked part-time as an emergency medical technician on a private ambulance in Baltimore. I would like to work there again, and I could really use the income, but without a car I have no way to get to Baltimore.

- 9. I received a letter dated June 12, 2012, that said that I would have to pay a \$2075 bond, or the MPD Property Clerk would declare my car forfeited.
- 10. I cannot afford to pay the bond. On June 26, 2012, I submitted an application for a waiver of the bond. I have not yet heard whether the bond will be waived or reduced.

I declare under penalty of perjury th	at the forgoing is true and correct.
Joseph Jan	07/11/12
Keith Chung	Date