

1. Mayor Brandon Scott and the City Council for Baltimore City are residents of Baltimore City, Maryland, as required, and further, are servants of Baltimore City and can be served with process at City Hall, 100 N. Holiday Street, Suite 400, Baltimore, MD 21202.
2. The conduct that is the basis of this petition was in part, a decision on or about January 18, 2022, resulting in an order ceasing the collection of recycling refuse in Baltimore at its regularly weekly scheduled times and continuing; allegedly to conduct a study with no definitive timeframe for resumption of weekly collection services per the City Charter.
3. The conduct that is also the basis of this petition further includes receipt of \$641 million in federal American Rescue Plan Act (ARPA) funding for the benefit of the Citizens of Baltimore, where \$14.7 million of those funds having been dolled to private entities for a short-term “clean-up” initiative known as ‘CLEAN CORPS’, with insufficient parameters, lack of transparency and duplicating services resulting in the same inadequacies, which have only been utilized to serve a fraction of problem communities within Baltimore City.
4. The conduct has caused the Petitioners and citizens of Baltimore at-large harm due to misuse of appropriated funds by a CLEAN CORP awardee. On March 15th, 2023, CLEAN CORP funds were misused and distributed for purposes other than those specifically intended for the CLEAN CORP program. Program employees are to be paid to collect and remove debris, garbage and refuse from streets, alleys, and walkways. However, the program awardee (Lazarus Rite Inc) compensated a large number of employees to attend a several hours long council meeting at City Hall.
5. The conduct, moreover, places the Petitioners and the citizens of Baltimore at-large at undue risk. On March 20th, 2023, media reports detailed a CLEAN CORP awardee (Lazarus Rite Inc) stating specifically that they were not prepared nor trained for dealing

with specific biohazards they are exposed to in performance of their tasks. The awardee detailed how employees encounter "thousands of used hypodermic needles" daily and are still unable to fully and properly address the issue as evidenced by the news broadcast. The report goes on to state that per CDC guidelines, used hypodermic needles can lead to transference of infectious diseases such as Hepatitis and HIV. Continuing to place these untrained and ill-equipped workers in harms-way could result in serious health issues for not only CLEAN CORP workers, but further exposing family members of the works as well as Petitioners and other citizens of Baltimore at-large. This further exposes Baltimore City government to serious financial risk of possible litigation, adversely impacting the tax dollars of the citizenry as a whole.

6. The Petitioners had attempted to resolve this matter without resorting to legal action, (seeking input from their duly elected Council persons to oppose such a violation of the City Charter) but Mayor Brandon Scott and certain members of the Baltimore City Council ignored the concerns and continued to engage in the conduct that is the basis of this petition.
7. The conduct that is the basis of this petition has caused Petitioners irreparable harm and they will continue to be harmed by the Mayor and CERTAIN MEMBERS OF THE City Council failing to follow the Baltimore City Charter and continuing to expose CLEAN CORP workers to dangerous work.
8. Petitioners are requesting an immediate temporary and both permanent injunction to prevent, cease and discontinue Mayor Brandon Scott and certain members of the Baltimore City Council from continuing to engage in the conduct that is the basis of this petition.

9. Petitioner's believe that Mayor Brandon Scott and certain members of the Baltimore City Council will continue to engage in the conduct that is the basis of this petition if an injunction is not issued.
10. Petitioners are aware of another legal proceeding (case # 24-C-23-001379) which by procedure requires a responsive period, scheduling and the engagement of discovery which would result in additional delays to address the same parties and similar issues as presented in this petition, in addition to the newly discovered harms occurring subsequent the referenced filing.

Wherefore, Petitioners respectfully request that this Honorable Court issue an injunction against Mayor Brandon Scott and certain members of the Baltimore City Council pursuant to Maryland Rule 15-501, enjoining Mayor Brandon Scott and certain members of the Baltimore City Council from engaging in the conduct that is the basis of this petition, and GRANTING Petitioners any other relief that the Court deems just and proper.

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

Respectfully submitted,



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