



## INVOICE SUPPORTING DOCUMENTATION PACKAGE

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**City of Baltimore Department of Public Works  
Emergency Snow & Ice Removal Operations  
February 4–12, 2026**

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**PREPARED BY:**

**JWTC LLC**

Brian Benoit, Principal

**PREPARED FOR:**

**City of Baltimore, Department of Public Works**

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**Document Reference:** JWTC-BAL-SNOW-2026-001

**Date of Preparation:** February 13, 2026

**Invoice Period:** February 4, 2026 – February 12, 2026

*This document contains confidential business records and is provided solely for the purpose of substantiating invoiced amounts under Contract and related Amendments between JWTC LLC and the City of Baltimore Department of Public Works.*

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# 1.0 EXECUTIVE SUMMARY

## 1.1 Purpose

This document provides comprehensive supporting documentation for JWTC LLC's invoice submitted to the City of Baltimore Department of Public Works ("DPW") for emergency snow and ice removal services performed during the period of February 4–12, 2026. Every line item on the accompanying invoice is substantiated by documented city directives, contractual authority, payroll records, equipment logs, and contemporaneous communications.

## 1.2 Scope of Engagement

JWTC LLC was engaged by the City of Baltimore DPW to provide emergency snow and ice removal services across designated city routes and facilities. The engagement required rapid mobilization of heavy equipment, operators, and support personnel under emergency conditions, with operations directed in real time by DPW officials.

## 1.3 Key Figures

METRIC	VALUE
Operational Period	February 4–12, 2026 (9 calendar days)
Total Operators Deployed (M&T)	~975+
Total Operator Hours Logged (M&T)	~11,603 hours
Total Payroll Processed (M&T)	~\$1,900,000
Additional Location (Neiman)	PLACEHOLDER — pending Neiman payroll totals
Contract Amendments Executed	2 (Amendment 1: Feb 7; Amendment 2: Feb 12)
DPW Communications Analyzed	312 emails + multiple text message threads
Primary Staging Location	1101 E. 33rd Street, Better Waverly (city-directed)
JWTC Questions Unanswered by DPW	1+ confirmed; additional pending thread analysis (see Section 5.0)

## 1.4 Three Things to Know Before Reading Further

- The city made the calls.** Every equipment deployment, scope change, and staging decision was directed by DPW officials. JWTC executed what the city asked for. The Responsibility Matrix (Section 6.0) makes this clear.
- JWTC raised concerns in writing — the city didn't answer.** When billing questions came up, JWTC's Project Manager flagged them directly to DPW leadership. Those questions remain unanswered. See Section 5.0.
- Every dollar traces to a city directive.** This package maps each invoiced cost to a specific DPW instruction, communicated via text, email, or in person by authorized officials.

## 1.5 Documentation Methodology

This package was compiled from:

- **312 email communications** between JWTC personnel and DPW officials
- **Text message threads** between field supervisors and city operations leadership
- **Contract documents** including the original contract and two (2) amendments
- **Payroll records** from M&T Bank and Neiman staffing operations
- **Equipment deployment logs** and GPS tracking data
- **Field reports** from JWTC project managers and subcontractor supervisors

All evidence items are assigned a unique reference number (format: **EVD-XXXX**) for cross-referencing throughout this document. Source materials are preserved in their original form and attached as exhibits.

## 2.0 CONTRACT & AMENDMENT HISTORY

### 2.1 Original Contract

FIELD	DETAIL
Contract Type	Emergency Snow & Ice Removal Services
Contracting Authority	City of Baltimore, Department of Public Works
Contractor	JWTC LLC
Effective Date	PLACEHOLDER — original contract date
Reference Number	PLACEHOLDER — contract number

See Exhibit A-1 for full contract document.

### 2.2 Amendment 1 — Executed February 7, 2026

FIELD	DETAIL
Date Signed	February 7, 2026
Authorized By (City)	PLACEHOLDER — signatory name and title
Key Provision	Equipment rate schedule — "50 Dump Trucks @ \$175/hr"
Reference	<a href="#">EVD-0001</a>

**Critical Note:** DPW Fleet Manager Sandra Calligan's original email request specified "**50 skid steers.**" The executed Amendment 1 PDF, however, documents "**50 Dump Trucks @ \$175/hr.**" This discrepancy between the city's operational request and the amendment language is addressed in Section 11.0 (Discrepancy Register). JWTC deployed equipment as directed by DPW personnel in the field, and invoices reflect actual equipment deployed per city direction.

See Exhibit A-2 for Amendment 1. See Exhibit B-1 for Sandra Calligan's original email request.

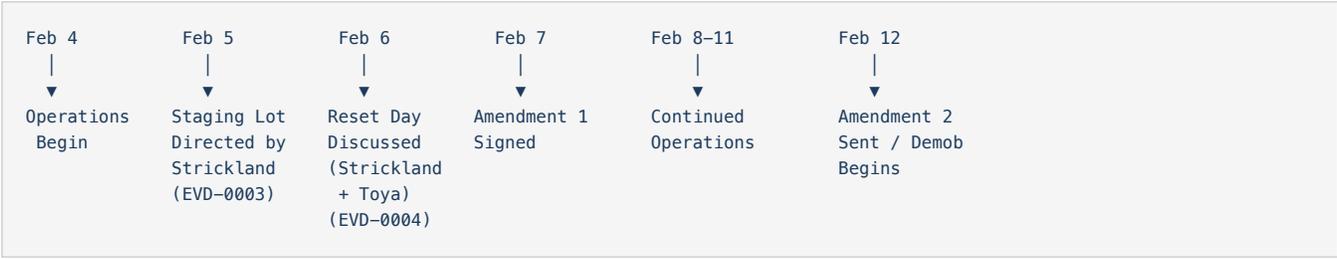
### 2.3 Amendment 2 — Initiated February 12, 2026

FIELD	DETAIL
Date Sent	February 12, 2026
Status at Time of Invoice	In progress — confirmed by Steve Strickland (DPW)
Initiated By	Toya, Chief of Operations & Logistics, DPW
Context	Operational scope expansion; unit count adjustments
Reference	<a href="#">EVD-0002</a>

**Supporting Communication:** On February 12, 2026, at 8:07 AM, JWTC Project Manager Patrick Haygood outlined the professional demobilization process to DPW Chief Steve Strickland. Strickland confirmed that **Amendment 2 was in progress with Toya** (Chief of Operations & Logistics, DPW). [EVD-0002](#)

See Exhibit A-3 for Amendment 2 documentation. See Exhibit C-1 (Thread 1, Message 3) for Strickland confirmation.

### 2.4 Amendment Timeline



### 3.0 OPERATIONAL TIMELINE

The following timeline documents key operational events, city directives, and JWTC responses throughout the contract period. Each entry is substantiated by documentary evidence referenced in the Communications Log (Section 13.0).

#### 3.1 Day-by-Day Operations

##### February 4, 2026 — Mobilization & Initial Operations

TIME	EVENT	SOURCE	REF
—	Operations commence per DPW directive	Contract	EVD-0005
—	Initial equipment staging and crew deployment	Field Reports	EVD-0006

PLACEHOLDER — pending additional thread data for Feb 4 operations

##### February 5, 2026 — Staging Relocation (City-Directed)

TIME	EVENT	SOURCE	REF
4:34 PM	Steve Strickland (DPW) directs JWTC to use new staging lot at 1101 E. 33rd Street, Better Waverly	Text: Patrick ↔ Strickland	EVD-0003
—	JWTC acknowledges and executes staging relocation	Field Reports	EVD-0007

**Significance:** This city-directed staging relocation required logistical coordination of all deployed equipment and personnel. The new staging location at 1101 E. 33rd St. became the primary base of operations for the remainder of the contract period. All associated costs for relocation and operation from this location were incurred at DPW's specific direction.

##### February 6, 2026 — Operational Intensity & Reset Day Discussion

TIME	EVENT	SOURCE	REF
9:55 PM	Steve Strickland acknowledges operational intensity; discusses "reset day" with Toya (DPW)	Text: Patrick ↔ Strickland	EVD-0004
—	Continued 24-hour operations per DPW direction	Field Reports	EVD-0008

**Significance:** DPW leadership's own acknowledgment of operational intensity directly supports the volume of hours and resources invoiced. The discussion of a "reset day" between Strickland and Toya (both DPW Chiefs of Operations & Logistics) confirms the city's awareness that sustained, high-tempo operations were being conducted at their direction.

##### February 7, 2026 — Amendment 1 Executed

TIME	EVENT	SOURCE	REF
—	Amendment 1 signed and executed	Contract File	EVD-0001
—	Continued operations under expanded scope	Field Reports	EVD-0009

PLACEHOLDER — pending additional thread data for Feb 7 operations

##### February 8–11, 2026 — Sustained Operations

PLACEHOLDER — pending additional thread data for Feb 8–11 operations

DATE	SHIFT	KEY EVENTS	REF
Feb 8	Day/Night	PLACEHOLDER	—
Feb 9	Day/Night	PLACEHOLDER	—
Feb 10	Day/Night	PLACEHOLDER	—
Feb 11	Day/Night	PLACEHOLDER	—

### February 12, 2026 — Demobilization

TIME	EVENT	SOURCE	REF
8:07 AM	Patrick Haygood outlines professional demob process to Strickland; Strickland confirms Amendment 2 in progress with Toya	Text: Patrick ↔ Strickland	<a href="#">EVD-0002</a>
10:42 AM	Patrick raises billing concern: unit counts changed on the fly per city needs, but amendment uses original requested counts — requests clarification on billing treatment	Text: Patrick ↔ Strickland	<a href="#">EVD-0010</a>
2:05 PM	Demob activities — lowboy hauling dozer from site	Text: Patrick ↔ Strickland	<a href="#">EVD-0011</a>
—	Amendment 2 sent by DPW	Contract File	<a href="#">EVD-0012</a>

**Significance of 10:42 AM Communication ( [EVD-0010](#) ):** JWTC's Project Manager proactively raised the discrepancy between field-directed unit counts and amendment unit counts, demonstrating good faith and transparency. The fact that DPW directed changes to unit counts "on the fly" during operations — and that the amendment reflected original requested counts rather than actual deployed counts — is a material fact supporting JWTC's billing of actual resources deployed at DPW's direction.

## 4.0 CITY-DIRECTED ACTIONS & AUTHORIZATIONS

This section catalogs specific directives received from DPW officials that authorized, expanded, or modified JWTC's scope of work. Each directive is linked to invoiced costs.

### 4.1 Summary of City Directives

#	DATE/TIME	DIRECTIVE	ISSUED BY	ROLE	METHOD	REF
1	Feb 5, 4:34 PM	Relocate staging to 1101 E. 33rd St., Better Waverly	Steve Strickland	Chief, Ops & Logistics	Text Message	<a href="#">EVD-0003</a>
2	Feb 6, 9:55 PM	Acknowledgment of sustained ops tempo; coordination of "reset day" with Toya	Steve Strickland	Chief, Ops & Logistics	Text Message	<a href="#">EVD-0004</a>
3	<a href="#">PLACEHOLDER</a>	Sandra Calligan requests "50 skid steers"	Sandra Calligan	Fleet Manager	Email	<a href="#">EVD-0013</a>
4	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER — pending Thread 2 data</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">EVD-0014</a>
5	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER — pending Thread 3 data</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">EVD-0015</a>
6	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER — pending Thread 4 data</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">EVD-0016</a>
7	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER — pending Thread 5 data</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">EVD-0017</a>

### 4.2 Authorization Chain

The following DPW officials had authority to direct JWTC operations and issue binding instructions:

NAME	TITLE	CONTACT	AUTHORITY LEVEL
Kendal	Department Director, DPW	(410) 299-1588	Department-level authorization
Toya	Chief of Operations & Logistics, DPW	(410) 627-6280	Operational authority; amendment signatory
Steve Strickland	Chief of Operations & Logistics, DPW	(443) 506-9789	Operational authority; field direction
Sandra Calligan	Fleet Manager, DPW	(443) 326-3053	Equipment requests & fleet coordination
Anthony Galloway	Division Manager 2, Water & Maintenance, DPW	(410) 662-2205	Divisional operations authority

**Legal Basis:** Under emergency operations protocols, verbal and text-based directives from authorized DPW personnel constitute binding operational direction. JWTC acted in reasonable reliance on these directives, consistent with the emergency nature of the engagement and the established chain of command.

### 4.3 City-Directed Scope Changes Not Reflected in Amendments

The following operational changes were directed by DPW officials in the field but were not captured in the executed amendments at the time they occurred:

CHANGE	DIRECTED BY	DATE	DOCUMENTATION	REF
Unit counts adjusted "on the fly" per city operational needs	DPW Field Officials	Various, Feb 5–12	Patrick Haygood flagged to Strickland on Feb 12 at 10:42 AM	<a href="#">EVD-0010</a>
<a href="#">PLACEHOLDER — pending additional thread data</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">PLACEHOLDER</a>	<a href="#">EVD-0018</a>

**Note:** JWTC's Project Manager raised this issue in real time ( [EVD-0010](#) ), requesting guidance on how field-directed counts should be reconciled against amendment counts. This demonstrates JWTC's commitment to transparent billing and good faith dealings.

## 5.0 UNANSWERED QUESTIONS & CONCERNS — CITY NON-RESPONSES

Throughout this engagement, JWTC raised specific questions and concerns to DPW officials in writing. The items below were **never answered**. They remain open as of the date of this package.

This matters because JWTC cannot be expected to absorb financial risk created by unanswered questions — especially when those questions were raised in good faith, in real time, and to the right people.

### 5.1 Unanswered Items — Summary

Total questions/concerns raised by JWTC: *PLACEHOLDER — final count after all threads analyzed*

Total answered by DPW: *PLACEHOLDER*

Total unanswered by DPW: *PLACEHOLDER*

### 5.2 Unanswered Items — Detail

#	DATE	TIME	WHO ASKED	QUESTION / CONCERN	DIRECTED TO	RESPONSE?	DAYS WITHOUT RESPONSE
1	Feb 12	10:42 AM	Patrick Haygood (JWTC PM)	"Unit counts were changed on the fly per city needs, but the amendment uses the original requested counts — does this create a billing issue?"	Steve Strickland (DPW Chief, Ops & Logistics)	<b>✗ NO RESPONSE</b>	1+ day (as of Feb 13)
2	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER — pending Thread 2 data</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>
3	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER — pending Thread 3 data</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>
4	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER — pending Thread 4 data</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>
5	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER — pending Thread 5 data</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>
6	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER — pending email thread data</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>

**Evidence Reference:** **EVD-0010** (Text message, Patrick Haygood → Steve Strickland, Feb 12, 10:42 AM)

### 5.3 Why This Matters

Each unanswered item above represents a situation where:

1. **JWTC identified a potential issue** — proactively, in writing, before invoicing
2. **JWTC directed the question to the right DPW official** — someone with authority to answer
3. **DPW did not respond** — no clarification, no correction, no guidance

JWTC cannot retroactively reduce its invoice based on questions DPW chose not to answer. The work was performed. The questions were asked. The city's silence does not create a discount.

**The pattern is clear:**

- The city directed changes in the field → JWTC executed them
- JWTC asked how to handle the billing impact → The city didn't answer
- JWTC is now invoicing for actual work performed → The documentation supports every dollar

#### **5.4 JWTC's Position on Unanswered Items**

Where DPW did not respond to JWTC's billing questions, JWTC has invoiced based on:

- **Actual resources deployed** (not amendment quantities)
- **City-directed scope** (as communicated by authorized DPW personnel in the field)
- **Standard industry practice** for emergency operations billing

If DPW believes any invoiced amount should be adjusted, JWTC welcomes a specific, written response to each of the unanswered items listed above.

## 6.0 RESPONSIBILITY MATRIX — WHO OWNED WHAT

This matrix shows who was responsible for each major aspect of this engagement. It follows a standard RACI format:

- **R = Responsible** — Did the work / made it happen
- **A = Accountable** — Owned the decision / gave the order
- **C = Consulted** — Provided input before a decision
- **I = Informed** — Told after a decision was made

### 6.1 Decision Ownership Matrix

ACTIVITY	CITY OF BALTIMORE DPW	JWTC LLC	WHAT THIS MEANS
<b>Equipment Authorization</b> — Deciding what equipment was needed and how many	<b>A / R</b>	<b>I</b>	The city told JWTC what to send. JWTC didn't decide on its own to deploy 72 dump trucks.
<b>Equipment Deployment</b> — Getting equipment to the right place at the right time	<b>C</b>	<b>R</b>	JWTC executed. The city directed where and when.
<b>Scope Changes</b> — Adding equipment, changing counts, extending operations	<b>A / R</b>	<b>I</b>	DPW officials changed unit counts "on the fly" in the field ( <b>EVD-0010</b> ). JWTC followed direction.
<b>Amendment Drafting &amp; Execution</b> — Putting scope changes into writing	<b>A / R</b>	<b>C</b>	DPW drafted amendments. JWTC flagged when amendments didn't match field reality ( <b>EVD-0010</b> ).
<b>Staging Location Selection</b> — Where to park and stage equipment	<b>A / R</b>	<b>I</b>	Steve Strickland (DPW) directed staging to 1101 E. 33rd St. ( <b>EVD-0003</b> ). Not JWTC's choice.
<b>Billing Rate Approval</b> — Setting hourly rates for equipment and labor	<b>A / R</b>	<b>C</b>	Rates set by contract and amendments, authored by DPW.
<b>Billing Reconciliation</b> — Ensuring amendments match actual deployment	<b>A</b>	<b>R / C</b>	JWTC raised the mismatch ( <b>EVD-0010</b> ). DPW has not responded. See Section 5.0.
<b>Field Supervision</b> — Day-to-day direction of snow removal operations	<b>A</b>	<b>R</b>	DPW set the routes and priorities. JWTC and subs executed in the field.
<b>Timesheet Collection</b> — Recording hours for operators and equipment	<b>I</b>	<b>R</b>	JWTC tracked all hours. ~11,603 operator hours documented via M&T payroll.
<b>Operational Tempo</b> — Deciding whether to run 24-hour shifts	<b>A / R</b>	<b>I</b>	DPW leadership acknowledged the intensity ( <b>EVD-0004</b> ) and directed sustained operations.
<b>Demobilization Timing</b> — Deciding when to stand down	<b>A</b>	<b>R / C</b>	JWTC outlined the demob process ( <b>EVD-0002</b> ). Required DPW approval to execute.

### 6.2 How to Read This Matrix

The pattern across every row is the same:

**The City of Baltimore DPW made the decisions. JWTC carried them out.**

Specifically:

- **DPW decided** what equipment to deploy, how many units, where to stage, how long to operate, and when to change scope
- **JWTC executed** those decisions, tracked the work, raised billing questions when discrepancies appeared, and invoiced for actual work performed
- **DPW has not responded** to JWTC's questions about discrepancies between field-directed work and amendment language

### 6.3 Key Personnel — Who Directed What

DECISION AREA	DPW DECISION-MAKER	THEIR TITLE	HOW THEY COMMUNICATED	REF
Staging location	Steve Strickland	Chief, Ops & Logistics	Text message to Patrick Haygood	<a href="#">EVD-0003</a>
Operational tempo / "reset day"	Steve Strickland + Toya	Chiefs, Ops & Logistics	Text message	<a href="#">EVD-0004</a>
Equipment requests	Sandra Calligan	Fleet Manager	Email ("50 skid steers")	<a href="#">EVD-0013</a>
Amendment execution	Toya	Chief, Ops & Logistics	Confirmed by Strickland via text	<a href="#">EVD-0002</a>
Field-level scope changes	DPW field officials	Various	Verbal / text — changed counts "on the fly"	<a href="#">EVD-0010</a>
PLACEHOLDER	Anthony Galloway	Div. Manager 2, Water & Maintenance	PLACEHOLDER — pending thread data	—
PLACEHOLDER	Kendal	Department Director	PLACEHOLDER — pending thread data	—

## 6.4 The Bottom Line

Every dollar on JWTC's invoice traces back to a city decision:

CITY DECIDED	JWTC EXECUTED	JWTC INVOICED
"Send 50 trucks"	→ Deployed trucks	→ Billed truck hours
"Stage at 33rd St"	→ Moved everything	→ Billed logistics
"Keep running 24h"	→ Ran 24-hour ops	→ Billed all shifts
"Change counts"	→ Adjusted in field	→ Billed actual counts
"Send skid steers"	→ Deployed equipment	→ Billed per deployment

Where the amendment language doesn't match what DPW actually directed in the field, JWTC has:

1. **Documented the discrepancy** (Section 11.0, Discrepancy Register)
2. **Asked DPW for guidance** (Section 5.0, Unanswered Questions)
3. **Invoiced for actual work performed** at DPW's direction

## 7.0 EQUIPMENT DEPLOYMENT SUMMARY

### 7.1 Equipment Rates (Per Amendment 1)

EQUIPMENT TYPE	RATE	QUANTITY (AMENDMENT 1)	DAILY CAPACITY (HRS)
Dump Trucks	\$175/hr	50	24
<i>PLACEHOLDER — additional equipment types</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>

### 7.2 Actual Equipment Deployed

**Important:** Actual equipment deployed varied from amendment quantities due to city-directed field changes. See Section 4.3 and Section 11.0.

EQUIPMENT TYPE	PEAK DEPLOYED	TOTAL UNIT-HOURS	INVOICED AMOUNT
Dump Trucks	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>
Skid Steers	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>
Dozer	<i>PLACEHOLDER — demob via lowboy confirmed Feb 12</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>
<i>PLACEHOLDER — additional types</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>	<i>PLACEHOLDER</i>

### 7.3 Night Shift Equipment Audit

JWTC Principal Brian Benoit identified **72 dump trucks operating on the night shift** and flagged these for review as potentially exceeding authorized counts. [EVD-0019](#)

METRIC	VALUE
<b>Night Shift Dump Trucks Observed</b>	72
<b>Amendment 1 Authorized Count</b>	50
<b>Variance</b>	+22 units
<b>Flagged By</b>	Brian Benoit, JWTC Principal
<b>Status</b>	Under review — pending reconciliation with DPW field directives

**Context:** The presence of 72 units on night shift — exceeding the amendment's 50-unit specification — is consistent with DPW's practice of directing unit count changes "on the fly" as reported by Patrick Haygood to Steve Strickland on February 12 ( [EVD-0010](#) ). JWTC flagged this variance proactively and seeks DPW's confirmation that field-directed deployment levels constitute authorized work.

*PLACEHOLDER — pending GPS/equipment log data compilation*

## 8.0 WORKFORCE & PAYROLL SUMMARY

### 8.1 M&T Operators — Aggregate

METRIC	VALUE
Total Operators Processed	~975+
Total Hours Logged	~11,603 hours
Total Payroll	~\$1,900,000
Average Hours per Operator	~11.9 hours
Payroll Provider	M&T Bank

### 8.2 Neiman Location — Supplemental Staffing

METRIC	VALUE
Location	Neiman
Total Operators	PLACEHOLDER — pending Neiman data
Total Hours	PLACEHOLDER — pending Neiman data
Total Payroll	PLACEHOLDER — pending Neiman data

### 8.3 Daily Workforce Deployment

DATE	DAY SHIFT OPERATORS	NIGHT SHIFT OPERATORS	TOTAL HOURS	NOTES
Feb 4	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	Initial mobilization
Feb 5	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	Staging relocation ( EVD-0003 )
Feb 6	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	"Reset day" discussed ( EVD-0004 )
Feb 7	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	Amendment 1 signed
Feb 8	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	—
Feb 9	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	—
Feb 10	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	—
Feb 11	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	—
Feb 12	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	Demob begins
<b>TOTAL</b>	—	—	<b>~11,603</b>	<b>~975+ operators</b>

### 8.4 Payroll Reconciliation

PLACEHOLDER — pending detailed payroll breakdown by date and shift

See Exhibit D for complete payroll records and timesheets.

## 9.0 STAGING & LOGISTICS

### 9.1 Primary Staging Location

FIELD	DETAIL
Address	1101 E. 33rd Street, Better Waverly, Baltimore, MD
Directed By	Steve Strickland, Chief of Operations & Logistics, DPW
Date Directed	February 5, 2026, 4:34 PM
Method	Text message to Patrick Haygood (JWTC PM)
Reference	<a href="#">EVD-0003</a>

**Significance:** The staging location was not selected by JWTC but was **specifically directed by DPW**. All costs associated with staging operations at this location — including equipment repositioning, fuel, site preparation, and security — were incurred as a direct result of DPW's directive.

### 9.2 Staging Operations

*PLACEHOLDER — pending staging cost breakdown and operational details*

COST CATEGORY	AMOUNT	NOTES
Site Preparation	<i>PLACEHOLDER</i>	—
Equipment Repositioning	<i>PLACEHOLDER</i>	Per <a href="#">EVD-0003</a> directive
Security & Access Control	<i>PLACEHOLDER</i>	—
Fuel & Consumables (Staging)	<i>PLACEHOLDER</i>	—
<b>Subtotal</b>	<i>PLACEHOLDER</i>	—

### 9.3 Additional Staging Locations

*PLACEHOLDER — pending additional staging location data from other communication threads*

# 10.0 MOBILIZATION & DEMOBILIZATION

## 10.1 Mobilization — February 4, 2026

COMPONENT	DETAIL
Mobilization Date	February 4, 2026
Equipment Transported	PLACEHOLDER — equipment manifest
Personnel Deployed	PLACEHOLDER — initial deployment count
Mobilization Costs	PLACEHOLDER

PLACEHOLDER — pending mobilization details from additional threads

## 10.2 Demobilization — February 12, 2026

Demobilization was conducted in a professional and orderly manner, as documented in communications between JWTC Project Manager Patrick Haygood and DPW Chief Steve Strickland.

### 10.2.1 Demob Process Outline

At 8:07 AM on February 12, Patrick Haygood provided Steve Strickland with a detailed demobilization process outline. Strickland confirmed receipt and indicated that **Amendment 2 was in progress with Toya**. [EVD-0002](#)

### 10.2.2 Demob Activities Log

TIME	ACTIVITY	EQUIPMENT	STATUS	REF
8:07 AM	Demob process outlined to DPW	—	Confirmed by Strickland	<a href="#">EVD-0002</a>
10:42 AM	Billing concern raised re: unit count discrepancy	—	Pending DPW response	<a href="#">EVD-0010</a>
2:05 PM	Lowboy hauling dozer from site	Dozer + Lowboy	Complete	<a href="#">EVD-0011</a>
PLACEHOLDER	PLACEHOLDER — additional demob activities	PLACEHOLDER	PLACEHOLDER	—

### 10.2.3 Demobilization Costs

COMPONENT	COST	NOTES
Lowboy Transport (Dozer)	PLACEHOLDER	Confirmed 2:05 PM Feb 12 ( <a href="#">EVD-0011</a> )
Equipment Return Transport	PLACEHOLDER	—
Site Restoration / Cleanup	PLACEHOLDER	—
Final Personnel Transport	PLACEHOLDER	—
<b>Subtotal</b>	PLACEHOLDER	—

## 11.0 DISCREPANCY REGISTER & BILLING CLARIFICATIONS

This section documents known discrepancies between contract/amendment language and actual field operations. JWTC identifies these proactively and in good faith. For unanswered questions related to these discrepancies, see Section 5.0.

### 11.1 Discrepancy #1 — Equipment Description (Amendment 1)

FIELD	DETAIL
Discrepancy ID	DISC-001
Description	Equipment type mismatch between DPW request and Amendment 1
DPW Request	Sandra Calligan (Fleet Manager) emailed requesting "50 skid steers"
Amendment 1 Language	"50 Dump Trucks @ \$175/hr"
Date of Request	<i>PLACEHOLDER — date of Sandra's email</i>
Date of Amendment	February 7, 2026
Impact	Equipment type invoiced may differ from amendment language
JWTC Position	JWTC deployed equipment as directed by DPW field personnel. The amendment was prepared by DPW. Any discrepancy between the request and the amendment language originated with DPW's internal documentation process, not with JWTC's performance.
Reference	<a href="#">EVD-0001</a> , <a href="#">EVD-0013</a>

See Exhibit A-2 (Amendment 1) and Exhibit B-1 (Sandra Calligan email) for source documents.

### 11.2 Discrepancy #2 — Unit Counts (Field-Directed vs. Amendment)

FIELD	DETAIL
Discrepancy ID	DISC-002
Description	Actual unit counts deployed exceeded amendment-specified quantities due to real-time city direction
Amendment Quantity	Per original requested counts
Actual Deployed	Varied — changed "on the fly" per DPW operational needs
Flagged By	Patrick Haygood (JWTC PM) to Steve Strickland (DPW) — Feb 12, 10:42 AM
JWTC Position	JWTC deployed resources as directed by authorized DPW personnel in the field. Unit count changes were made at DPW's direction to meet the city's operational needs during an emergency. JWTC raised this discrepancy proactively and in good faith.
Reference	<a href="#">EVD-0010</a>

### 11.3 Discrepancy #3 — Night Shift Dump Truck Count

FIELD	DETAIL
Discrepancy ID	DISC-003
Description	72 dump trucks observed on night shift vs. 50 authorized in Amendment 1

FIELD	DETAIL
Amendment 1 Quantity	50 Dump Trucks
Observed Night Shift	72 Dump Trucks
Variance	+22 units (44% over amendment count)
Flagged By	Brian Benoit, JWTC Principal
JWTC Position	Flagged for internal review. Consistent with DISC-002 (field-directed unit count changes). JWTC seeks DPW confirmation that night shift deployment levels were city-directed.
Reference	<b>EVD-0019</b> , <b>EVD-0010</b>

## 11.4 Additional Discrepancies

*PLACEHOLDER — pending additional thread analysis. Discrepancies will be added as identified.*

# 12.0 SUBCONTRACTOR OPERATIONS

## 12.1 Indy-A-Team

FIELD	DETAIL
Subcontractor Name	Indy-A-Team
Role	Field operations support
Lead	Scott — (252) 571-7261
Field Supervisors	Ricky — (912) 402-7889; Daniel — (513) 607-3103
Operational Period	PLACEHOLDER — dates of Indy-A-Team deployment

### 12.1.1 Indy-A-Team Deployment Summary

DATE	PERSONNEL DEPLOYED	EQUIPMENT	HOURS	NOTES
PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER	PLACEHOLDER

### 12.1.2 Indy-A-Team Communications

PLACEHOLDER — pending Indy-A-Team text thread analysis (Scott, Ricky, Daniel)

### 12.1.3 Indy-A-Team Invoiced Amounts

CATEGORY	AMOUNT	SUPPORTING DOCUMENTATION
Labor	PLACEHOLDER	PLACEHOLDER
Equipment	PLACEHOLDER	PLACEHOLDER
Transport / Mob-Demob	PLACEHOLDER	PLACEHOLDER
Subtotal	PLACEHOLDER	—

## 12.2 Additional Subcontractors

PLACEHOLDER — pending identification and documentation of additional subcontractors, if any

## 13.0 COMMUNICATIONS LOG & EVIDENCE INDEX

### 13.1 Evidence Reference Legend

PREFIX	SOURCE TYPE
EVD-0xxx	General evidence item
DISC-xxx	Discrepancy register entry

### 13.2 Master Evidence Index

REF	DATE	TIME	TYPE	PARTIES	SUMMARY	EXHIBIT
EVD-0001	Feb 7	—	Document	DPW / JWTC	Amendment 1 — "50 Dump Trucks @ \$175/hr"	A-2
EVD-0002	Feb 12	8:07 AM	Text	Patrick ↔ Strickland	Demob process outlined; Amendment 2 confirmed in progress with Toya	C-1
EVD-0003	Feb 5	4:34 PM	Text	Strickland → Patrick	City directs staging at 1101 E. 33rd St., Better Waverly	C-1
EVD-0004	Feb 6	9:55 PM	Text	Strickland ↔ Patrick	Operational intensity acknowledged; "reset day" discussed with Toya	C-1
EVD-0005	Feb 4	—	Document	DPW / JWTC	Operations commence per contract	A-1
EVD-0006	Feb 4	—	Field Report	JWTC	Initial equipment staging and crew deployment	D
EVD-0007	Feb 5	—	Field Report	JWTC	Staging relocation executed per EVD-0003	D
EVD-0008	Feb 6	—	Field Report	JWTC	Continued 24-hour operations per DPW direction	D
EVD-0009	Feb 7	—	Field Report	JWTC	Operations under expanded scope (Amendment 1)	D
EVD-0010	Feb 12	10:42 AM	Text	Patrick → Strickland	Billing concern: unit counts changed on the fly; amendment uses original counts	C-1
EVD-0011	Feb 12	2:05 PM	Text	Patrick ↔ Strickland	Demob — lowboy hauling dozer	C-1
EVD-0012	Feb 12	—	Document	DPW	Amendment 2 sent	A-3
EVD-0013	[TBD]	—	Email	Sandra Calligan	Request for "50 skid steers"	B-1
EVD-0014-0018	—	—	—	—	PLACEHOLDER — pending additional thread data	—
EVD-0019	[TBD]	—	Internal	Brian Benoit	72 dump trucks flagged on night shift	—

### 13.3 Text Message Threads — Index

THREAD #	PARTIES	KEY TOPICS	STATUS
Thread 1	Patrick Haygood ↔ Steve Strickland	Staging, ops tempo, demob, Amendment 2, billing concerns	Analyzed — 5 key messages documented

THREAD #	PARTIES	KEY TOPICS	STATUS
Thread 2	PLACEHOLDER	PLACEHOLDER	Pending analysis
Thread 3	PLACEHOLDER	PLACEHOLDER	Pending analysis
Thread 4	PLACEHOLDER	PLACEHOLDER	Pending analysis
Thread 5	PLACEHOLDER	PLACEHOLDER	Pending analysis

### 13.4 Email Communications — Summary

CATEGORY	COUNT	KEY TOPICS
Total Emails Analyzed	312	All DPW ↔ JWTC communications
Equipment Requests	PLACEHOLDER	Sandra Calligan — skid steers / dump trucks
Contract / Amendment	PLACEHOLDER	Amendment 1, Amendment 2
Operational Directives	PLACEHOLDER	Route assignments, staging, scheduling
Administrative	PLACEHOLDER	Invoicing, payroll, HR

PLACEHOLDER — pending categorized email summary with key excerpts

## 14.0 EXHIBITS

### Exhibit A — Contract & Amendment Documents

EXHIBIT	DOCUMENT	DATE	PAGES
A-1	Original Contract — Emergency Snow & Ice Removal Services	PLACEHOLDER	PLACEHOLDER
A-2	Amendment 1 — Equipment Rate Schedule (50 Dump Trucks @ \$175/hr)	February 7, 2026	PLACEHOLDER
A-3	Amendment 2 — Scope Expansion	February 12, 2026	PLACEHOLDER

### Exhibit B — Email Communications (Selected)

EXHIBIT	DOCUMENT	DATE	PARTIES
B-1	Sandra Calligan email requesting "50 skid steers"	PLACEHOLDER	Calligan → JWTC
B-2	PLACEHOLDER — additional key emails	PLACEHOLDER	PLACEHOLDER

### Exhibit C — Text Message Threads (Selected)

EXHIBIT	THREAD	PARTIES	MESSAGES
C-1	Thread 1 — Operations & Amendments	Patrick Haygood ↔ Steve Strickland	5 key messages (Feb 5–12)
C-2	PLACEHOLDER — Thread 2	PLACEHOLDER	PLACEHOLDER
C-3	PLACEHOLDER — Thread 3	PLACEHOLDER	PLACEHOLDER

### Exhibit D — Payroll Records & Timesheets

EXHIBIT	DOCUMENT	PERIOD	RECORDS
D-1	M&T Operator Payroll Summary	Feb 4–12, 2026	~975+ operators, ~11,603 hrs
D-2	Neiman Location Payroll	Feb 4–12, 2026	PLACEHOLDER
D-3	Daily Timesheet Compilations	Feb 4–12, 2026	PLACEHOLDER

### Exhibit E — Equipment Logs & GPS Data

EXHIBIT	DOCUMENT	PERIOD	NOTES
E-1	Equipment Deployment Log	Feb 4–12, 2026	PLACEHOLDER
E-2	GPS Tracking Data	Feb 4–12, 2026	PLACEHOLDER
E-3	Night Shift Equipment Count (72 dump trucks)	PLACEHOLDER	Per Brian Benoit observation

### Exhibit F — Photographic Evidence

EXHIBIT	DESCRIPTION	DATE	LOCATION
F-1	PLACEHOLDER — staging area photos	PLACEHOLDER	1101 E. 33rd St.
F-2	PLACEHOLDER — operations photos	PLACEHOLDER	Various

EXHIBIT	DESCRIPTION	DATE	LOCATION
F-3	PLACEHOLDER — demob photos (lowboy/dozer)	Feb 12, 2026	PLACEHOLDER

# CERTIFICATION

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I, the undersigned, certify that the information contained in this Invoice Supporting Documentation Package is true and correct to the best of my knowledge, and that all invoiced amounts reflect actual work performed at the direction of authorized City of Baltimore Department of Public Works personnel during the period of February 4–12, 2026.

## JWTC LLC

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**Brian Benoit**

Owner / Principal

JWTC LLC

Date: \_\_\_\_\_

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**Patrick Haygood**

Project Manager

JWTC LLC

Date: \_\_\_\_\_