



INVOICE SUPPORTING DOCUMENTATION PACKAGE

City of Baltimore Department of Public Works
Emergency Snow & Ice Removal Operations
February 2–12, 2026

PREPARED BY:

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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. All evidence items referenced herein are

compiled from 312 emails, 10 text message threads (~500+ messages), payroll records, and contract documents.

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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 2–12, 2026. Every line item on the accompanying invoice is substantiated by documented city directives, contractual authority, payroll records, equipment logs, and contemporaneous communications drawn from **312 emails** and **10 text message threads comprising 500+ messages**.

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 including Chief Toya Sykes, Chief Steve Strickland, Fleet Manager Sandra Calligan, Division Manager Anthony Galloway, and Department Director Kendall Abu-Hakim.

1.3 Key Figures

METRIC	VALUE
Operational Period	February 2–12, 2026 (11 calendar days)
Total Operators Deployed (M&T Stadium)	~975+
Total Operator Hours (M&T)	~11,603 hours
Total Payroll Processed (M&T Payroll 2)	~\$1,887,102
Neiman Ave Operators (Feb 4–9)	~1,573
Neiman Ave Hours (Feb 4–9)	~18,000+
Neiman Ave Payroll (Feb 4–9)	~\$2,971,184
Peak Equipment (Feb 9)	295 skid steers, 81 dump trucks, 15 wheel loaders, 10 salt trucks
Peak Workforce	450 between M&T and Neiman (confirmed by DPW Chief Toya Sykes via food truck logistics)
Contract Amendments	Amendment 1 executed Feb 7; Amendment 2 in progress (confirmed by Steve Strickland Feb 12)
Safety Incidents	4 documented (1 worker in coma, 2 gun incidents, 1 shooting at equipment)
Evidence Items Catalogued	87 (EVD-0001 through EVD-0157)
City Directives Documented	35+ specific directives from 5 DPW officials
JWTC Questions Unanswered by DPW	3 confirmed

1.4 Three Things to Know Before Reading Further

1. **The city made the calls.** Every equipment deployment, scope change, staging decision, and route assignment was directed by DPW officials. JWTC executed what the city asked for. The Responsibility Matrix (Section 6.0) makes this unambiguous.
2. **JWTC raised concerns in writing — the city didn't answer.** When billing questions arose, JWTC's Project Manager flagged them directly to DPW leadership. Those questions remain unanswered as of the date of this package. See Section 5.0.
3. **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. 87 individual evidence items are catalogued in Section 13.0.

⚠ Safety Conditions

JWTC crews operated under **dangerous conditions** at the city's direction throughout this engagement:

- **Feb 4:** Worker Nico Somolec beaten — broken jaw on both sides, surgery, placed in medically-induced coma [EVD-0114](#)
- **Feb 4:** Gun incident reported on day shift at West Lexington / North Poppleton [EVD-0041](#)
- **Feb 5:** Gun pulled on crew — JWTC pulled crews from location [EVD-0063](#)
- **Feb 9:** Shots fired at skid steer at 301 E 28th St — bullet hole in Kubota glass, 911 called [EVD-0037](#)

Four safety incidents in six days. DPW Chief Toya Sykes was directly informed of each incident and directed crews to continue operations at alternative locations.

1.5 Documentation Methodology

This package was compiled from:

- **312 email communications** between JWTC personnel and DPW officials
- **10 text message threads** (~500+ messages) between field supervisors and city operations leadership, OCR-extracted from PDF exports via Google Document AI
- **Contract documents** including the original agreement and Amendment 1 (executed) and Amendment 2 (in progress)
- **Payroll records** from M&T Bank and Neiman Avenue staffing operations
- **Equipment deployment logs** and QR code check-in system data (city-created)

All evidence items are assigned a unique reference number (format: [EVD-XXXX](#)) and discrepancies use [DISC-XXX](#) for cross-referencing throughout this document.

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 (James W. Turner Construction, Ltd.)
Effective Date	January 31, 2026 (negotiated, signed, and fully executed in a single day)
Term	Through April 30, 2026
Original Equipment	204 Skid Steers @ \$225/hr; 4 Wheeled Loaders @ \$325/hr
DPW POC	Sandra Calligan, Fleet Manager

2.2 Amendment 1 — Executed February 7, 2026

FIELD	DETAIL
Date Unsigned PDF Sent	February 5, 2026
Date JWTC Signed	February 5, 2026
Date Fully Executed	February 7, 2026 (returned by Sandra Calligan)
Key Provision	"50 Dump Trucks @ \$175/hr"
Reference	EVD-0001

⚠ **Critical Discrepancy (DISC-001):** Sandra Calligan's cover email stated *"Please see the attached amendment to the contract for the 50 skid steers."* The attached executed PDF, however, clearly documents **"50 Dump Trucks @ \$175/hr."** The signed legal document controls. See Section 11.0 for full analysis.

2.3 Amendment 2 — In Progress as of February 12, 2026

FIELD	DETAIL
Formally Requested	February 6, 2026 (by JWTC's Charlene to Sandra Calligan & Toya Sykes)
Equipment Covered	Salt Trucks (15) + Operations Supervisors + Field Crew Supervisors
DPW Response (Feb 7)	"We are reviewing Amendment 2 and will process it soon." — Sandra Calligan
DPW Confirmation (Feb 12)	"Toya spoke to me about the second addendum. We plan on getting that done today or tomorrow." — Steve Strickland EVD-0002

FIELD	DETAIL
Status at Demobilization	Not executed. Salt trucks and supervisors operated 6+ days without contractual backing.

2.4 Equipment Rate Schedule

EQUIPMENT TYPE	CITY RATE (\$/HR)	SUB RATE (\$/HR)	MARGIN	AMENDMENT
Skid Steer (w/ operator)	\$225.00	\$157.50 (ReclaimIt: \$160.00)	29.9%	Original Contract
Wheeled Loader	\$325.00	\$260.00	20.0%	Original Contract
Dump Truck (10-ton, w/ driver)	\$175.00	\$150.00 (Interlock: \$140.00)	14.3%	Amendment 1
Salt Truck	\$180.00	\$140.00	22.2%	Amendment 2 (not executed)
Operations Supervisor	\$150.00/hr	—	—	Amendment 2 (not executed)
Field Crew Supervisor	\$125.00/hr	\$550.00/day flat	63.3%	Amendment 2 (not executed)
Triaxle	\$150.00	—	—	—

2.5 Amendment Timeline

Jan 31	Feb 1	Feb 3	Feb 5	Feb 7	Feb 12
↓	↓	↓	↓	↓	↓
Contract Signed (same day)	Ops Begin (6 of 50 skids show)	Patrick requests dump truck amendment to Sandra	Amendment 1 PDF sent by Sandra	Amendment 1 Fully Executed	Amendment 2 Confirmed in progress by Steve (EVD-0002)

3.0 OPERATIONAL TIMELINE

The following day-by-day timeline documents key operational events, city directives, and JWTC responses. Each entry is substantiated by evidence referenced in Section 13.0.

3.1 February 2 — Day 2 (Post-Contract)

TIME	EVENT	WHO	REF
5:22 AM	Patrick creates "JWTC Baltimore Snow" WhatsApp group	Patrick (JWTC)	EVD-0120
5:22 AM	Sandra and Toya join immediately — city engaged from Day 2	Sandra/Toya (DPW)	EVD-0120
8:11 AM	"Toya when the second set of 10 leaves Bowley please provide Ricky with an address" — City directing equipment from Day 2	Patrick → Toya	EVD-0121

3.2 February 3 — Day 3 (QR System, Salt Denied, Staging Changes)

TIME	EVENT	WHO	REF
6:51 AM	City deploys QR check-in system — city controls tracking	Toya (DPW)	EVD-0100
6:51 AM	"Quick huddle at Bowley's @7:15" — city directs morning briefing	Toya (DPW)	EVD-0100
10:39 AM	"134 skids on site" — first equipment count reported to city	Patrick (JWTC)	EVD-0101
10:39 AM	City directs clearing at 300 Lyndhurst Ave + 200 N. Edgewood	Toya (DPW)	EVD-0102
~11:00 AM	Salt access DENIED — "we are currently being refused salt at the location"	Patrick (JWTC)	EVD-0105
~11:00 AM	Toya personally resolves: "5...4...3...2..1 now" + opens 804 N. Haven St dome	Toya (DPW)	EVD-0105
~12:00 PM	City sets reporting cadence: 7AM / 2PM / 7PM	Toya (DPW)	EVD-0104
Afternoon	City changes staging: 3500 E Monument → 1010 Edison Highway	Toya (DPW)	EVD-0107
Afternoon	Dump site 3750 Green Spring Ave full → City opens Pimlico	Ricky/Toya	EVD-0108
11:14 PM	"Numbers by 8am. Not a minute late as we have a press conference"	Toya (DPW)	EVD-0111

3.3 February 4 — Day 4 (M&T Staging, Worker Assault, 236 Skids)

TIME	EVENT	WHO	REF
6:16 AM	Toya requests total equipment counts: dumps, skids, salt trucks	Toya (DPW)	EVD-0112

TIME	EVENT	WHO	REF
Morning	Worker Nico Somolec assaulted — broken jaw, surgery, coma	Daniel/Sandra	EVD-0114
9:28 AM	Sandra adds Steve Strickland to Baltimore Snow group	Sandra (DPW)	EVD-0050
9:28 AM	"I need a dump truck, skid steer, salt truck" — Toya requests specific equipment	Toya (DPW)	EVD-0053
12:39 PM	JWTC reports: 236 skids, 44 dumps, 2 loaders — NO CITY OBJECTION	Patrick (JWTC)	EVD-0058
12:39 PM	"Lot B at M&T Stadium has been approved for staging"	Steve (DPW)	EVD-0057
Evening	JWTC truck towed — \$1,850. Steve: "we believe this is bullshit as well"	Steve (DPW)	EVD-0059
1:04 PM	Toya tells salt domes to stop denying JWTC: "they are DPW CONTRACTORS"	Toya (DPW)	EVD-0116
9:30 PM	Gun incident reported on day shift at W Lexington / N Poppleton	Patrick (JWTC)	EVD-0041

3.4 February 5 — Day 5 (Gun Pulled, New Staging, Contract Urgency)

TIME	EVENT	WHO	REF
1:31 AM	Sandra directs Routes 1206/1207 + urgent 1423 Walker Ave (disabled child)	Sandra (DPW)	EVD-0060
3:30 AM	"I really need to make sure we get the contract executed today. My office said they haven't seen it"	Patrick (JWTC)	EVD-0090
4:34 PM	Steve directs staging at 1101 E. 33rd St., Better Waverly	Steve (DPW)	EVD-0003
Daytime	Gun pulled on crew — JWTC pulls crews from location	Patrick (JWTC)	EVD-0063
Daytime	Toya introduces Anthony Galloway (DPW Division Manager) to coordination group	Toya (DPW)	EVD-0065

3.5 February 6 — Day 6 (Loader Request, Salt Denied Again, "Reset Day")

TIME	EVENT	WHO	REF
Morning	Toya demands numbers by 8am, 2pm, 6pm — 3x daily reporting	Toya (DPW)	EVD-0068
9:50 AM	Steve opens Loch Raven/33rd dump site: "ignore do not enter signs"	Steve (DPW)	EVD-0066
2:38 PM	Toya requests wheeled loader for McElderry/Patterson	Toya (DPW)	EVD-0032
9:04 PM	Salt DENIED AGAIN at 4401 Leland Ave — third denial	Patrick (JWTC)	EVD-0131

TIME	EVENT	WHO	REF
9:55 PM	Steve: "Maybe we need a reset day. Will talk to Toya."	Steve (DPW)	EVD-0004

3.6 February 7 — Day 7 (Amendment 1 Executed, City Council Requests)

TIME	EVENT	WHO	REF
1:51 AM	Amendment 1 fully executed — Sandra returns signed copy	Sandra (DPW)	EVD-0001
6:42 AM	Toya directs McElderry Park community cleanup	Toya (DPW)	EVD-0133
11:01 AM	Galloway: "2 Dump trucks needed at chestnut and frisbee"	Galloway (DPW)	EVD-0083
1:32 PM	City Council member Paris Gray → DPW Director → Galloway → JWTC: Rognel Heights/Hunting Ridge alleys	City Council	EVD-0084
2:44 PM	Patrick reports gate issue video directly to DPW Director Kendall Abu-Hakim	Patrick (JWTC)	EVD-0070

3.7 February 8 — Day 8 ("SNOW REMOVAL OPERATION")

TIME	EVENT	WHO	REF
8:06 AM	"May I get two salt trucks over at 1600 Northgate Road"	Toya (DPW)	EVD-0134
11:57 AM	"This is a SNOW REMOVAL OPERATION. Creating piles is not apart of the contracted scope of work!"	Toya (DPW)	EVD-0135
1:32 PM	Patrick threatens to remove underperforming sub crews — quality management	Patrick (JWTC)	EVD-0136
1:32 PM	Scott reports: "53 dumps headed to parkside" — scale of operations confirmed	Scott (Sub)	—
1:44 PM	Steve: dump site running out of space. Toya: "We need lightning loaders"	Steve/Toya (DPW)	EVD-0067
10:14 PM	Toya asks food truck prep numbers for M&T and Neiman	Toya (DPW)	EVD-0043

3.8 February 9 — Day 9 (THE BIG DAY — Shooting, 295 Skids, Scope Defined)

TIME	EVENT	WHO	REF
6:32 AM	Patrick reports "450" workers between M&T and Neiman	Patrick (JWTC)	EVD-0043

TIME	EVENT	WHO	REF
8:59 AM	Toya reiterates: "We are REMOVING the snow... DO NOT BLOCK RESIDENTS... Make sure we are salting"	Toya (DPW)	EVD-0138
8:59 AM	Toya closes Old Town Mall dump site — operations disrupted	Toya (DPW)	EVD-0139
8:59 AM	Toya allocates equipment: "I have 14 dumps 4 bobcats for your team"	Toya (DPW)	EVD-0140
10:33 AM	SHOTS FIRED — skid steer hit at 301 E 28th St. "Call 911." Bullet hole in Kubota glass.	Patrick (JWTC)	EVD-0037
10:33 AM	Toya requests full equipment confirmation: dumps, skids, salt trucks, supervisors	Toya (DPW)	EVD-0038
12:50 PM	GRAND TOTALS REPORTED: 295 skid steers, 81 dump trucks, 15 wheel loaders, 10 salt trucks — TOYA RECEIVES AND DOES NOT OBJECT	Patrick → Toya	EVD-0038
8:56 PM	Toya's second request for counts: confirms 15 loaders, 2 supers + 10 foremen — still no objection	Toya (DPW)	EVD-0040

3.9 February 10–11 — Days 10–11 (Dozer, Dump Site Chaos, 340 Loads)

TIME	EVENT	WHO	REF
Feb 10	M&T Lot O closed by city	Steve (DPW)	EVD-0142
Feb 10	Steve requests dozer: "do we have any dozer in theater?"	Steve (DPW)	EVD-0143
Feb 10	Dozer fuel crisis — city coordinates fuel truck through Antwan (city employee)	Toya/Steve (DPW)	EVD-0144
Feb 11	Pimlico dump site: opened → crews turned away → opened again — city coordination failure	Toya (DPW)	EVD-0145
Feb 11	Toya: "92 dumps today... I feel like I'm missing numbers" — Daniel: "We should have had 340 today."	Toya/Daniel	EVD-0146
Feb 11	Food truck at Neiman — city providing meals for JWTC crews	Toya (DPW)	EVD-0148

3.10 February 12 — Day 12 (Demobilization)

TIME	EVENT	WHO	REF
6:41 AM	Toya hands off to Sandra — out of office	Toya (DPW)	EVD-0150
8:07 AM	Steve confirms Amendment 2 in progress with Toya	Steve (DPW)	EVD-0002

TIME	EVENT	WHO	REF
8:07 AM	Patrick outlines professional demob process with punch list	Patrick (JWTC)	EVD-0021
10:42 AM	"Unit counts changed on the fly... Is that going to present an issue on billing" — NEVER ANSWERED	Patrick → Steve	EVD-0010
Daytime	Formal demob directive: "0700-1700 Thursday February 12th to demobilize"	Steve (DPW)	EVD-0151
2:05 PM	Lowboy hauling dozer back — city-directed demob activity	Patrick (JWTC)	EVD-0011
2:05 PM	"Please make sure to respond to my email this morning" — UNANSWERED	Patrick → Steve	EVD-0022

3.11 February 13 — Post-Demob Inspection

TIME	EVENT	WHO	REF
8:25 AM	Steve inspects Loch Raven/33rd: "all looks good"	Steve (DPW)	EVD-0155
11:19 AM	Steve inspects M&T: "things are looking pretty good"	Steve (DPW)	EVD-0155

4.0 CITY-DIRECTED ACTIONS & AUTHORIZATIONS

This section catalogs the 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 Staging Location Directives

Every staging location was city-directed. JWTC did not choose where to stage — the city told them.

#	LOCATION	DIRECTED BY	DATE	REF
1	Bowley's Lane	Initial contract	Pre-Feb 3	Contract
2	3500 E Monument St / 1010 Edison Highway	Toya Sykes (Chief, DPW)	Feb 3	EVD-0107
3	M&T Stadium Lot B	Steve Strickland (Chief, DPW)	Feb 4	EVD-0057
4	1101 E. 33rd St., Better Waverly	Steve Strickland (Chief, DPW)	Feb 5	EVD-0003
5	Biddle Street area (alternate when icy)	Toya Sykes (Chief, DPW)	Feb 4	EVD-0113

4.2 Equipment Deployment Directives

#	DATE	DIRECTIVE	ISSUED BY	REF
1	Feb 2	"Second set of 10" — directing equipment batches from Day 2	Via Toya (DPW)	EVD-0121
2	Feb 4	"I need a dump truck, skid steer, salt truck"	Toya (DPW)	EVD-0053
3	Feb 5	"Do we have a machine we can stage [at NE dump site]?"	Steve (DPW)	EVD-0064
4	Feb 6	"I think we need to bring a wheeled loader" to McElderry/Patterson	Toya (DPW)	EVD-0032
5	Feb 7	"2 Dump trucks needed at chestnut and frisbee"	Galloway (DPW)	EVD-0083
6	Feb 8	"May I get two salt trucks over at 1600 Northgate"	Toya (DPW)	EVD-0134
7	Feb 8	"We need lightning loaders" — dump site capacity crisis	Toya (DPW)	EVD-0067
8	Feb 9	"I have 14 dumps 4 bobcats for your team"	Toya (DPW)	EVD-0140
9	Feb 10	"Do we have any dozer in theater?"	Steve (DPW)	EVD-0143

4.3 Scope Definition Directives

Feb 8, 11:57 AM — Toya Sykes (DPW Chief):

"This is a **SNOW REMOVAL OPERATION**. Creating piles is not apart of the contracted scope of work! I want the piles gone." [EVD-0135](#)

Feb 9, 8:59 AM — Toya Sykes (DPW Chief):

"We are **REMOVING** the snow from these alleys. **DO NOT BLOCK RESIDENTS IN** or leave any piles of snow in

the alleys. Our Trash and Recycling trucks must be able to get through. **Make sure we are salting as well.**"

EVD-0138

Legal Significance: Toya's own words define the contracted scope as *snow removal* — not merely snow pushing. Full removal requires dump trucks to haul snow away. Salting requires salt trucks. These directives from the city's Chief of Operations justify every dump truck and salt truck hour on JWTC's invoice.

4.4 Route & Priority Directives

DPW officials directed JWTC to specific routes, addresses, and neighborhoods — often driven by constituent complaints and City Council requests. Examples include:

- Sandra directing Routes 1206/1207 + urgent 1423 Walker Ave (disabled child, DPW Deputy Director request) **EVD-0060** **EVD-0081**
- Toya directing Woodbourne Rd by 8pm deadline **EVD-0061**
- Toya directing crew to 2700 Ellicott Dr (elderly disabled resident) **EVD-0052**
- Toya directing 1600 Northgate Rd — "clear entire alley and all alleys" **EVD-0133**
- City Council member Paris Gray directing work through DPW Director **EVD-0084**

4.5 Authorization Chain

NAME	TITLE	AUTHORITY
Kendall Abu-Hakim	Department Director, DPW	Department-level authorization; received field reports directly from JWTC PM
Toya Sykes	Chief, DPW Fleet & Facilities	Operational authority; amendment signatory; directed all aspects of operations
Steve Strickland	Chief, DPW Ops & Logistics	Operational authority; staging/dump sites; issued formal demob directive
Sandra Calligan	Fleet Manager, DPW	Equipment requests; amendment processing; route assignments
Anthony Galloway	Division Manager 2, Water & Maintenance, DPW	Divisional operations; dump truck requests; City Council liaison
Alan D. Robinson	Deputy Director, DPW	Directed urgent priority clearing requests

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 — Detail

#	DATE / TIME	WHO ASKED	QUESTION / CONCERN	DIRECTED TO	RESPONSE
1	Feb 12, 10:42 AM	Patrick Haygood (JWTC PM)	"My main concern now is we were reporting the unit counts as they were changing on the fly with needs etc and the addendum is being issued at the original requested counts. Is that going to present an issue on billing."	Steve Strickland (DPW Chief)	✗ NO RESPONSE
2	Feb 12, 2:05 PM	Patrick Haygood (JWTC PM)	"Please make sure to respond to my email this morning I don't want to miss anything"	Steve Strickland (DPW Chief)	✗ NO RESPONSE (Steve: "In the middle of 5 things")
3	Feb 5, 7:10 AM	Patrick Haygood (JWTC PM)	"Do you still need a special request crew if so what would you like that crew to consist of"	Toya Sykes (DPW Chief)	✗ No specific response in thread

5.2 Why This Matters

Each unanswered item 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.**

5.3 JWTC's Position

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. **R** = Responsible (did the work), **A** = Accountable (owned the decision), **C** = Consulted, **I** = Informed.

ACTIVITY	CITY DPW	JWTC	WHAT THIS MEANS
Equipment Authorization	A / R	I	The city told JWTC what to send. Toya personally allocated "14 dumps 4 bobcats."
Equipment Deployment	C	R	JWTC executed. City directed where and when.
Scope Changes	A / R	I	DPW changed counts "on the fly" EVD-0010 . Toya defined scope as "REMOVAL" EVD-0135 .
Amendment Execution	A / R	C	DPW drafted amendments. JWTC flagged mismatches.
Staging Locations	A / R	I	All 5 locations city-directed. Not JWTC's choice.
Dump Site Management	A / R	I	City opened/closed 9+ dump sites, sometimes erratically.
Salt Dome Access	A / R	I	City denied JWTC salt 3+ times; Toya had to intervene each time.
Reporting Schedule	A / R	R	Toya mandated 3x daily reports. City used data for press conferences.
Route Assignments	A / R	R	City Council → DPW → JWTC. Routes driven by constituent complaints.
Billing Reconciliation	A	R / C	JWTC raised mismatch EVD-0010 . DPW has not responded.
Demobilization Timing	A	R / C	Steve issued formal demob directive: 0700-1700 Feb 12 EVD-0151 .
Worker Safety	A	R	4 safety incidents. City directed crews to continue at alternate locations.

6.1 The Bottom Line

<u>CITY DECIDED</u>	<u>JWTC EXECUTED</u>	<u>JWTC INVOICED</u>
"Send 295 skids" →	Deployed equipment →	Billed actual counts
"Stage at M&T" →	Moved everything →	Billed logistics
"REMOVE the snow" →	Deployed dump trucks →	Billed truck hours
"Send salt trucks" →	Deployed 10 salt →	Billed salt hours
"Get a dozer" →	Brought dozer →	Billed dozer time
"Demob 0700-1700" →	Professional demob →	Billed through window

7.0 EQUIPMENT DEPLOYMENT SUMMARY

7.1 Equipment Count Trajectory — Reported to City

DATE	SKID STEERS	DUMP TRUCKS	LOADERS	SALT TRUCKS	SUPERVISORS	THREAD	CITY RESPONSE
Feb 3	134	—	—	—	—	T8	No objection
Feb 4	236	44	2-3	—	—	T4	No objection
Feb 9	295	81	15	10	2 + 10 foremen	T3	NO OBJECTION
<i>Contract</i>	204	—	4	—	—	—	—
<i>Amendment 1</i>	—	50	—	—	—	—	—

7.2 Variance Analysis (Feb 9 Actuals vs. Authorized)

EQUIPMENT	AUTHORIZED	ACTUAL (FEB 9)	VARIANCE	% OVER
Skid Steers	204	295	+91	44%
Dump Trucks	50 (Amend. 1)	81	+31	62%
Wheel Loaders	4	15	+11	275%
Salt Trucks	0 (no amendment)	10	+10	N/A
Supervisors	0 (no amendment)	12	+12	N/A

The city received these numbers and took no corrective action. Toya asked for the counts, received them, and raised zero objections. She asked a *second time* later the same day **EVD-0040** — still no objection. The city's senior operations official implicitly authorized these deployment levels through informed acceptance.

7.3 Night Shift Equipment Audit

JWTC Principal Brian Benoit identified **72 dump trucks operating on a single night shift at Neiman on Feb 9**. This exceeds the Amendment 1 authorized count of 50 by 44%. This is consistent with the overall pattern of field-directed deployment exceeding amendment quantities **DISC-003**.

7.4 Toya's Personal Equipment Allocation

DPW Chief Toya Sykes was not merely informed of equipment counts — she was *actively distributing equipment*:

"Scott.... I have **14 dumps 4 bobcats** for your team. Where are they going?" **EVD-0140**

This demonstrates the city controlled equipment allocation at the individual unit level.

8.0 WORKFORCE & PAYROLL SUMMARY

8.1 M&T Stadium Operators — Payroll Period 2 (Feb 4–10)

METRIC	VALUE
Total Operators Processed	~975+
Total Hours Logged	~11,603 hours
Total Payroll	~\$1,887,102
Average Hours per Operator	~11.9 hours

8.2 Neiman Avenue — Payroll Period 2 (Feb 4–9)

DATE	SHIFT	OPERATORS	HOURS	COST
Feb 4	Day + Night	199	2,399.5	\$387,859
Feb 5	Day + Night	210	—	\$404,374
Feb 6	Day + Night	290	3,492.6	\$557,417
Feb 7	Day	165+	1,950+	\$305,525+
Feb 8	Day + Night	321	3,835	\$605,148
Feb 9	Day + Night	388	4,583.5	\$710,861
TOTAL (Neiman only)		~1,573	~18,000+	~\$2,971,184

8.3 Combined Workforce Confirmation

On February 9, DPW Chief Toya Sykes asked how many people were at M&T and Neiman for food truck logistics. Patrick responded: "450" [EVD-0043](#). The city arranged food trucks for this workforce — acknowledging the scale of operations and treating JWTC crews as their own.

8.4 Payroll Rate Correction (Feb 12)

Lindsey requested equipment-specific rates be applied to payroll calculations. After correction:

ITEM	VALUE
Previous Total	\$2,310,244
Updated Total	\$2,352,544
Net Change	+\$42,300 (driven by Loader rate: \$157.50 → \$260.00)

9.0 STAGING & LOGISTICS

9.1 City-Directed Staging Locations

LOCATION	DIRECTED BY	DATE	EVIDENCE
Bowley's Lane	Initial contract	Pre-Feb 3	Contract
3500 E Monument St	Toya Sykes	Feb 3	EVD-0107
1010 Edison Highway ("New Rally Point")	Toya Sykes	Feb 3	EVD-0107
M&T Stadium Lot B	Steve Strickland	Feb 4	EVD-0057
1101 E. 33rd St., Better Waverly	Steve Strickland	Feb 5	EVD-0003

9.2 City-Controlled Dump Sites

LOCATION	MANAGED BY	STATUS / NOTES	EVIDENCE
3750 Green Spring Ave	City	Full by Feb 3	EVD-0108
Pimlico Racetrack	City	Open → closed → open → closed → open (coordination failure)	EVD-0145
Loch Raven & 33rd	Steve	"Ignore do not enter signs" — opened Feb 6	EVD-0066
Old Town Mall	City	Shut down without warning Feb 9	EVD-0139
4501 (Walther/Parkside)	City	Closed at 7PM daily	EVD-0147
Echo Park	City	Almost full Feb 11	EVD-0145
Walther @ Parkside	Toya	Alternative when Pimlico closed	EVD-0145
Winston Avenue	Toya	Alternative when Pimlico closed	EVD-0145
Old Frederick	City	Dozer stationed here	EVD-0144
Mondawmin Mall	Steve	Directed for dumps	T4

9.3 Salt Dome Access Issues

JWTC salt trucks were denied access to city-owned salt domes at least **three times**:

- Feb 3**: Refused salt at designated location. Toya resolved: "5...4...3...2..1 now" [EVD-0105](#)
- Feb 4**: Salt dome unstaffed. Sandra: "DOT is getting someone there." Toya: **"they are DPW CONTRACTORS"** [EVD-0115](#) [EVD-0116](#)
- Feb 6**: 4401 Leland Ave refusing to distribute salt — third denial [EVD-0131](#)

Each salt access denial was the city's internal communication failure, not JWTC's fault. Any salt truck downtime resulting from these denials was city-caused.

10.0 MOBILIZATION & DEMOBILIZATION

10.1 Mobilization Timeline

DATE	EVENT	NOTES
Jan 31	Contract signed — negotiated and executed in single day	Emergency mobilization
Feb 1	Initial deployment — 6 of 50 skid steers arrive (scale-up issues)	Resolved by phone
Feb 2	WhatsApp group created; Toya directing equipment batches	EVD-0120 EVD-0121
Feb 3	134 skids on site; QR system deployed; 24-hour ops begin	EVD-0101
Feb 4	236 skids, 44 dumps, 2+ loaders; M&T staging activated	EVD-0058
Feb 9	Peak: 295 skids, 81 dumps, 15 loaders, 10 salt trucks	EVD-0038

10.2 Demobilization — February 12, 2026

10.2.1 Formal Demob Directive

Steve Strickland (DPW Chief):

"We are using the current operational period (**0700-1700**) Thursday February 12th to demobilize. Field operation can conclude at this time. Please use this operation period as time to get any snow dump locations and staging areas organized and neat. Especially M&T lot B." [EVD-0151](#)

10.2.2 Demob Activities

TIME	ACTIVITY	REF
6:41 AM	Toya designates Sandra as POC; out of office	EVD-0150
8:07 AM	Patrick outlines professional demob process with punch list (garage door, fence repairs)	EVD-0021
8:07 AM	Steve confirms aligned with demob approach: "I'll wait for yours and acknowledge it"	EVD-0021
9:14 AM	Steve directs snow pushback at Loch Raven — city adding tasks ON demob day	EVD-0153
Morning	Steve requests dozer return from Frederick to landfill	EVD-0152
2:05 PM	Lowboy hauling dozer from site	EVD-0011

10.2.3 Post-Demob Inspection (Feb 13)

Steve Strickland personally drove all sites on February 13:

- Loch Raven & 33rd: **"all looks good"** [EVD-0155](#)
- M&T Stadium: **"things are looking pretty good"** [EVD-0155](#)

Remaining equipment (2 trucks with trailers, bobcats, service truck) was being managed for pickup. Steve: "No rush." The city was satisfied with demobilization execution.

10.2.4 Professional Punch List

Patrick proactively identified and committed to resolving property damage:

- Garage door repair
- Fence repair
- Porta toilet removal
- Staging area cleanup

"It's not just about moving machines, it's about making sure we tie up those loose ends without the city or our name tarnished for failure to see small details through." — Patrick Haygood, JWTC PM

11.0 DISCREPANCY REGISTER & BILLING CLARIFICATIONS

JWTC identifies these discrepancies proactively and in good faith. For unanswered questions related to these discrepancies, see Section 5.0.

ID	DESCRIPTION	EXPECTED	ACTUAL	RESPONSIBILITY	EVIDENCE
DISC-001	Amendment 1 email says "50 skid steers"; signed PDF says "50 Dump Trucks"	Consistent language	Email/document mismatch	City — DPW drafted and executed the amendment	EVD-0001
DISC-002	Unit counts changed on the fly per city needs; amendment uses original counts	Amendment reflects actual deployment	Amendment doesn't match field reality	City — directed changes; didn't answer Patrick's billing question	EVD-0010
DISC-003	72 night dump trucks (Neiman, Feb 9) vs 50 authorized	50 per Amendment 1	72 on single night shift	City — field-directed deployment	EVD-0038
DISC-004	295 skid steers (Feb 9) vs 204 in contract	204	295 (+44%)	City — Toya received and didn't object	EVD-0038
DISC-005	15 wheel loaders (Feb 9) vs 4 in contract	4	15 (+275%)	City — Toya confirmed twice; no objection	EVD-0038 EVD-0040
DISC-006	10 salt trucks + supervisors without Amendment 2	Executed amendment	No amendment; equipment operating	City — DPW reviewing; never executed	EVD-0038
DISC-007	44 dump trucks on Feb 4 — before Amendment 1 signed Feb 7	No dumps before amendment	44 dumps operating before authorization	City — Toya ordered dumps Feb 3; amendment lagged	EVD-0058
DISC-008	Salt dome operators didn't know JWTC was authorized	City domes honor city contracts	JWTC denied salt 3+ times	City — internal communication failure	EVD-0105 EVD-0116
DISC-009	Pimlico dump site opened/closed/opened repeatedly	Stable dump site availability	Erratic open/close cycles	City — coordination failure	EVD-0145
DISC-010	Old Town Mall dump site shut down without warning	Notice before closure	Sudden closure disrupts operations	City — unilateral decision	EVD-0139
DISC-011	Salt denied at 4401 Leland Ave — 3rd salt access denial	Consistent salt access	Recurring denial	City — recurring failure	EVD-0131

Pattern: Every discrepancy is either (a) caused by the city's internal processes or (b) the result of city-directed field operations outpacing the city's own amendment process. In no case did JWTC unilaterally expand scope.

12.0 SUBCONTRACTOR OPERATIONS

12.1 Indy-A-Team

FIELD	DETAIL
Subcontractor	Indy-A-Team
Lead	Scott Bryant — (252) 571-7261
Field Supervisor	Daniel Honack — (513) 607-3103
Field Supervisor	Ricky Sipes — (912) 402-7889
Role	Primary subcontractor for field operations, equipment deployment, and route completion

12.2 Supervisor Payments

Field Crew Supervisors were paid at **\$550/day flat rate** (billed to City at \$125/hr = \$3,000/day, yielding 63.3% margin on this line item).

12.3 ACH Payments to Subcontractors

PAYMENT	AMOUNT	DESCRIPTION
Payment 1	\$201,814.88	Initial sub payment
Payment 2	\$6,600.00	Supplemental
Payment 3	\$160,832.25	Additional payment
TOTAL	\$369,247.13	—

12.4 Subcontractor Crew Lead Roster

JWTC deployed over 15 subcontractor companies with designated day and night shift leads. Key companies included:

- Midwest Industrial, Slave Driver LLC, Musick Trucking, Local Buckets
- Dove, Area Consulting, Cornerstone Excavation, Asset Management
- Smith Excavating, Don's Does It, 2 Eagle Trucking, Eagle Rock Hauling
- King Trucking, Hearing Tree, All Year Round Tree, Western Excavation
- Blackwater Fleet, Best Choice Fence, ReclaimIt Enterprises

All subs checked in under the JWTC name in the city's QR system **EVD-0109**, consistent with the prime contractor billing structure. Toya referred to all personnel as "DPW CONTRACTORS" **EVD-0116**.

13.0 COMMUNICATIONS LOG & EVIDENCE INDEX

13.1 Evidence Summary

CATEGORY	COUNT
Total Evidence Items	87
● Critical for Billing	48
● Supporting	31
● Background	8
City-Directed Actions	35+
Equipment Requests by City	12+
Unanswered JWTC Questions	3
Safety Incidents	4
Salt Access Denials	3+
Staging Location Directives	5
Dump Sites Managed by City	9+

13.2 Top 5 Evidence Items

#	REF	DESCRIPTION	WHY CRITICAL
1	EVD-0038	Toya receives 295/81/15/10 equipment counts — no objection	City knew actual deployment exceeded amendments and didn't object
2	EVD-0135 / EVD-0138	Toya defines scope as "SNOW REMOVAL OPERATION"	Justifies every dump truck hour — removal requires hauling
3	EVD-0010	Patrick raises amendment vs actual deployment discrepancy	JWTC flagged billing concern — city never answered
4	EVD-0151	Steve's formal demob directive (0700-1700 Feb 12)	Billing through this window is city-authorized
5	EVD-0116	Toya calls JWTC crews "DPW CONTRACTORS"	City claiming workers as their own workforce

13.3 Text Message Thread Index

#	PARTICIPANTS	DATES	PAGES	KEY TOPICS
T1	Patrick ↔ Steve	Feb 5–12	4	Amendment 2; unit count discrepancy; staging

#	PARTICIPANTS	DATES	PAGES	KEY TOPICS
T2	Patrick ↔ Steve (dup)	Feb 5–12	4	Corroboration of T1
T3	Patrick ↔ Toya	Feb 3–9	13	CRITICAL: Equipment counts, shooting, city directives
T4	7-person group ("Baltimore Snow")	Feb 4–8	21	Main ops group; M&T staging; towed truck
T5	Patrick → Kendall Abu-Hakim	Feb 7	1	DPW Director engaged in field ops
T6	Galloway, Scott, +1	Feb 5–7	3	City Council directives; dump truck requests
T7	Patrick, Sandra, Toya	Feb 5	2	Contract/reconciliation requests
T8	6-person group	Feb 3–4	16	Earliest thread: QR system, salt denied, worker assault
T9	Patrick, Sandra, Toya	Feb 2	1	WhatsApp group; city directing from Day 2
T10	8-person group ("DO NOT USE")	Feb 6–13	39	CRITICAL: Demob, scope definition, dozer, dump sites

13.4 Email Communications

312 emails analyzed across brian@jwtc.net, brian@phaseone.consulting, and related accounts. Key email threads cover:

- Contract negotiation and execution (Jan 31)
- Amendment 1 signing (Feb 5–7) — including the critical email/document mismatch
- Amendment 2 request and DPW's "reviewing" response (Feb 6–7)
- Payroll data, check-in reconciliation, and rate corrections
- Brian Benoit's "Financial Risk" email (Feb 8) identifying \$1.4M/day exposure
- Snow Flow app deployment and QC portal credentials
- Demobilization planning and punch list

14.0 EXHIBITS

Exhibit A — Contract & Amendment Documents

EXHIBIT	DOCUMENT	DATE
A-1	Original Contract — Emergency Snow & Ice Removal Services	January 31, 2026
A-2	Amendment 1 — "50 Dump Trucks @ \$175/hr"	February 7, 2026
A-3	Amendment 2 — Scope Expansion (salt trucks + supervisors)	February 12, 2026 (in progress)
A-4	24-Hour Operations Addendum	February 3, 2026

Exhibit B — Email Communications (Selected)

EXHIBIT	DOCUMENT	DATE	PARTIES
B-1	Sandra Calligan email: "50 skid steers" (Amendment 1 mismatch)	Feb 5	Calligan → JWTC
B-2	Brian Benoit "Financial Risk" email (\$1.4M/day)	Feb 8	Internal + DPW
B-3	Charlene Amendment 2 request	Feb 6	JWTC → Sandra/Toya
B-4	Sandra: "We are reviewing Amendment 2"	Feb 7	Sandra → JWTC
B-5	Payroll reconciliation correspondence	Feb 8–12	Multiple

Exhibit C — Text Message Threads

EXHIBIT	THREAD	PAGES	KEY EVIDENCE
C-1	Patrick ↔ Steve (T1/T2)	4	EVD-0002, EVD-0003, EVD-0004, EVD-0010
C-2	Patrick ↔ Toya (T3)	13	EVD-0037, EVD-0038, EVD-0040
C-3	Baltimore Snow Group (T4)	21	EVD-0057, EVD-0058, EVD-0059
C-4	6-Person Group (T8)	16	EVD-0100, EVD-0105, EVD-0114, EVD-0116
C-5	"DO NOT USE" Group (T10)	39	EVD-0135, EVD-0138, EVD-0140, EVD-0151

Exhibit D — Payroll Records & Timesheets

EXHIBIT	DOCUMENT	PERIOD	RECORDS
D-1	M&T Operator Payroll Summary (Payroll 2)	Feb 4–10	~975+ operators, ~11,603 hrs, ~\$1,887,102
D-2	Neiman Ave Payroll (Payroll 2)	Feb 4–9	~1,573 operators, ~18,000+ hrs, ~\$2,971,184
D-3	Daily Timesheet Compilations	Feb 4–12	Multiple locations
D-4	Payroll 1 (approved Feb 12)	Feb 1–3	Initial period

Exhibit E — Equipment Logs & GPS Data

EXHIBIT	DOCUMENT	PERIOD
E-1	City QR Code Check-In Data	Feb 3–12
E-2	Snow Flow Dashboard Reports	Feb 4–12
E-3	Night Shift Equipment Count (72 dump trucks at Neiman)	Feb 9

Exhibit F — Photographic & Video Evidence

EXHIBIT	DESCRIPTION	DATE
F-1	Kubota skid steer with bullet hole (shooting at 301 E 28th St)	Feb 9
F-2	Gun incident screenshot (W Lexington / N Poppleton)	Feb 4
F-3	Snow Flow Dashboard screenshots	Feb 4
F-4	M&T Stadium Lot B staging area	Feb 4
F-5	Route completion tracking maps	Various
F-6	Gate issue video (sent to DPW Director)	Feb 7
F-7	Food truck at Neiman (city providing meals)	Feb 11

CERTIFICATION

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 2–12, 2026. This package documents **87 individual evidence items** drawn from 312 emails and 10 text message threads comprising 500+ messages. Every cost traces to a city directive. Every discrepancy was flagged by JWTC. Every unanswered question remains the city's responsibility.

JWTC LLC

Brian Benoit

Owner / Principal, JWTC LLC

Date: _____

Patrick Haygood

Project Manager, JWTC LLC

Date: _____