

December 20, 2022

NSK, LLC (Property Owner)  
Attn.: Faisal Khan, Founding Member and Resident Agent  
11640 W. Westchester Lane  
Ellicott City, MD 21042

NSK, LLC  
Attn.: Havenwood BP Gas Station  
1501 Havenwood Road  
Baltimore, MD 21218

Carroll Independent Fuel, LLC  
Attn.: Michael Jennings, General Counsel  
Jack Amos, Insurance/Claims Administrator  
2700 Loch Raven Road  
Baltimore, MD 21218

Re: **NOTICE OF PUBLIC NUISANCE HEARING** for “BP Gas Station”  
1501 Havenwood Rd., Baltimore, MD 21218

TO: NSK, LLC; Mr. Faisal Khan; Havenwood BP Gas Station; Mr. Jack Amos; Mr.  
Michael Jennings

As owner of the property at 1501 Havenwood Rd., NSK LLC and operator/tenant of the “BP Gas Station” Havenwood BP Gas Station and Mr. Faisal Khan in his/her individual capacity), you are hereby notified that on **Wednesday January 25, 2023** a hearing shall be held before the Police Commissioner for Baltimore City, or the Commissioner’s designee, to determine if the property at 1501 Havenwood Rd. (“the Property”) is a “public nuisance,” as defined under Baltimore City Code, Article 19, Subtitle 43, and whether the Property should be closed. Under Baltimore City Code, Article 19, § 43-3, the Commissioner has the right to order that the Property be closed, more commonly referred to as “padlocked.” The business at the Property is being considered for closing because, over the past twenty-two months, there have been at least six (6) incidents involving crimes of violence or the illegal distribution of controlled dangerous substances (“CDS”) in/at/or near the Property. Baltimore City Code, Article 19, § 43-1(k) defines a “public nuisance” as any premises that, on two or more separate occasions within a twenty-four month period, were used for such criminal activity.

On February 8, 2021, BPD officers responded to a call for service involving an individual who claimed he was robbed and cut outside of the Property. According to the individual, he was approached by three men who attempted to rob him. He resisted, fled the scene,

and discovered upon returning home that he had been cut on the left arm. Such activity, in conjunction with any other violation set forth in this notice, constitutes a “public nuisance” pursuant to Baltimore City Code, Art. 19, § 43-1(k)(1).

On August 31, 2021, Baltimore Police Department (“BPD”) officers responded to the Property for a complaint of disorderly conduct. Upon arrival at the Property, officers observed an unoccupied and unlocked vehicle, from which emitted the overwhelming odor of marijuana. Through the window of the vehicle, officers observed packaging material that they knew to be consistent with street level marijuana distribution in the area. After an individual approached and entered the vehicle, BPD initiated a stop. Upon opening the driver’s door pursuant to the stop, the odor of marijuana increased. The officers seized two hand rolled cigars containing suspected marijuana, and conducted a CDS investigation. As part of this investigation, BPD found a loaded 9 mm P80 semiautomatic weapon under the driver’s seat of the vehicle. BPD also recovered a plastic bag of suspected marijuana from the vehicle. Such activity, in conjunction with any other violation set forth in this notice, constitutes a “public nuisance” pursuant to Baltimore City Code, Art. 19, § 43-1(k)(1).

On October 21, 2021, BPD members observed what they believed to be a drug transaction at the Property. BPD members observed an unidentified male approach another individual, and after a brief conversation, observed the exchange of a plastic bag with a green substance, suspected to be marijuana, in exchange for various U.S. currency in bill form. BPD members then followed the suspected CDS purchaser, stopped him, and conducted a search of his person. BPD members recovered a plastic bag containing a green substance (suspected marijuana), a digital scale with residue (suspected marijuana), and several plastic containers with green substances (suspected marijuana). Such activity, in conjunction with any other violation set forth in this notice, constitutes a “public nuisance” pursuant to Baltimore City Code, Art. 19, § 43-1(k)(1).

On November 2, 2022, BPD members observed a suspected CDS transaction in the rear parking lot of the Property. Upon arriving at the parking lot, BPD members observed an unidentified male hand another individual a clear plastic bag containing green plant material that was suspected to be marijuana. BPD members pursued the suspected dealer, who fled after members attempted to stop him. During the ensuing chase, the individual dropped a purse, which the officers had observed as being on his person during the suspected CDS transaction. BPD members recovered the purse, which contained a loaded Polymer 80 9 mm semi-automatic handgun, several bags containing a green plant substance (suspected marijuana), and several green plastic tubes commonly used to package marijuana for street level distribution. Such activity, in conjunction with any other violation set forth in this notice, constitutes a “public nuisance” pursuant to Baltimore City Code, Art. 19, § 43-1(k)(1).

On December 3, 2022, BPD members were parked near the Property conducting surveillance of the location. During their shift, they observed an unidentified male standing next to the Property. The members observed the male having several conversations with others who walked past him into the gas station store. The members then observed the individual approach a female, withdraw an unknown item from his pocket, and hand it to

the female. The female then withdrew an item from her pockets and handed it to the male. BPD members believed this to be a drug transaction, and they then followed the female. Upon stopping the female and informing her of what they observed, she handed the officers a clear tube with a pink top containing a green plant substance (suspected marijuana). The members then returned to the Property and arrested the suspected dealer. Upon searching him, the members located several clear tubes with pink tops containing green plant substances (suspected marijuana). Such activity, in conjunction with any other violation set forth in this notice, constitutes a “public nuisance” pursuant to Baltimore City Code, Art. 19, § 43-1(k)(1).

On December 11, 2022, BPD members responded to a shooting involving several individuals at the Property. Upon arrival, BPD members learned that the victim had entered the gas station store, and that three unidentified individuals entered the gas station’s parking lot on foot, began shooting inside the BP gas station store, and fled the scene. One individual was transported to Johns’ Hopkins Hospital in stable condition, and one victim was fatally wounded. Such activity, in conjunction with any other violation set forth in this notice, constitutes a “public nuisance” pursuant to Baltimore City Code, Art. 19, § 43-1(k)(1).

You have the right to be heard and represented at the hearing. Failure to appear at the hearing will not prevent the Police Commissioner or the Commissioner’s designee from issuing a default order to close all or a portion of the Property. In closing all or a portion of the Property, neither the Police Commissioner, the BPD, nor the City of Baltimore is taking possession, ownership or control of the Property. Enclosed please find copies of Baltimore City Code, Art. 19, Subtitle 43-1 (the “Padlock” law) and “The Rules and Regulations for Padlock Hearings.”

The hearing will be held at 601 E. Fayette Street on the 5th floor in the Police Commissioner’s Board Room. The hearing will begin at 9:00 A.M.

Any request for a postponement must be made ten (10) days prior to the hearing. The request shall be sent to the Baltimore Police Department, Attn.: Office of Legal Affairs, 100 N. Holliday Street, Suite 101, Baltimore, MD 21202 and the Baltimore Housing Code Enforcement Legal Section, Property Based Crime Solutions Program, 417 E. Fayette Street, Room 355, Baltimore, Maryland 21202. The postponement request shall state the reason(s) for the postponement request and shall be signed by the party requesting the postponement.

Upon receipt of this notice, please contact the Property Based Crime Solutions Program at (410) 591-8492, with any questions about this process and to confirm your attendance at the hearing on **January 25, 2023.**

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Date

Michael Harrison, Commissioner  
Baltimore City Police Department

Enclosures

cc: Deputy Commissioner, Richard Worley  
Col. Kevin A. Jones  
Maj. Johnathan Amey  
Eileen Murphy, Assistant State's Attorney  
Mark Dewire, Chief Solicitor, Police Legal Affairs