



THE
SNYDER LAW GROUP
LLC

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August 25, 2022

**VIA CERTIFIED MAIL RETURN RECEIPT
REQUESTED AND REGULAR MAIL**

City Solicitor for Baltimore City
Department of Law
Central Bureau of Investigation
7 E. Redwood Street, 6th Floor
Baltimore, Maryland 21202

Maryland State Treasurer's Office
Attn: Legal Department
Louis L. Goldstein Treasury Building
80 Calvert Street, Room 109
Annapolis, Maryland 21401

Baltimore City Police Department
Attn: Chief of Police
500 E. Baltimore Street
Baltimore, Maryland 21202

Re: *Timothy Reynolds, Deceased*
Shannon Reynolds, Individually, as the Surviving Wife, as the
Personal Representative of the Estate of Timothy Reynolds, and as
Mother and Next Friend of
Rebecca Reynolds, as Mother and Next Friend of . , a
Minor

Carroll Reynolds, as Surviving Father of Timothy Reynolds
Mary Ebner, as Surviving Mother of Timothy Reynolds



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TO WHOM IT MAY CONCERN:

Please accept this letter as notice of claim pursuant to Maryland Code Annotated, Courts and Judicial Proceeding § 5-304, et seq. (Local Government Tort Claims Act (LGTC)) as well as Title 12 of the State Government Article, Maryland Code (Maryland Tort Claims Act (MTCA)) as well as 42 U.S.C. § 1983.

Please be advised that The Snyder Law Group, LLC, has been retained to represent the surviving family members and the Estate of Timothy Reynolds who was murdered on July 7, 2022, after being shot in the back by a Squeegee Worker at the intersection of Light Street and Conway Street.

The Plaintiffs noted above will be pursuing claims against the City of Baltimore, the Baltimore City Mayor's Office, the Baltimore City Mayor, the Baltimore City Police Department, the State's Attorney's Office of Baltimore City, and the State's Attorney of Baltimore City, among others. The Plaintiffs allege that the Defendants acted with gross negligence in the performance of their duties and in failing to protect the citizens and residents of Baltimore and others from an unreasonable risk of harm which the Defendants knew existed. The Defendants' failure to act was a calculated and intentional decision and a failure to perform a manifest duty in reckless disregard of the consequences as affecting the life or property of another. The Defendants' actions were so utterly indifferent to the rights of others that they acted as if such rights did not exist ultimately resulting in harm and death to the Plaintiff, Timothy Reynolds, and his surviving family members. If the Defendants had acted pursuant to acceptable standards, Mr. Reynolds would not have been placed in an unreasonably dangerous situation, he would not have been injured, he would not have died, and his family would not be grieving his loss.

The Defendants mentioned above utterly failed to enforce the laws of Maryland and failed to provide the Plaintiffs with the protections and rights which they were entitled, through among other things, the United States Constitution. The Mayor and his offices intentionally failed to put into place procedures, strategies, and policies whereby Squeegee Workers who violated the law would be arrested



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and prosecuted. Additionally, the Mayor and his offices failed to direct the Baltimore City Police Department, the State's Attorney's Office of Baltimore City, and the State's Attorney for Baltimore City to arrest and/or prosecute offenders. Due to their collective gross negligence and unconstitutional practices, the Defendants promoted and allowed the Squeegee Workers' illegal violence to continue under color of state law.

Rather than deter this illegal activity by, among other things, enforcing the Laws (thereby protecting its citizens), the Defendants, in assuming and recognizing their obligations, created plans, policies, and procedures which rewarded these known criminals by allowing them to continue their illegal activities while also attempting to place some of them in various employment positions within the city. Additionally, the Defendants, on multiple occasions made it clear and unambiguous that they would not detain, arrest, and/or prosecute these individuals. The Defendants instead intentionally turned a blind eye to the alarming and increasing violence, despite actual knowledge that people were being attacked and injured. It was only a matter of time before someone would be severely injured and/or murdered.

Pursuant to the above failures, an environment of lawlessness and chaos evolved. One where the criminals knew they wouldn't be detained, arrested, and/or prosecuted. The Defendants made the decision to, among other things, allow these Squeegee Workers to continue to unlawfully harass members of our community, forcing themselves upon Baltimore citizens, committing crimes against Baltimore citizens, injuring Baltimore citizens, and ultimately causing the violent death of Timothy Reynolds.

In addition to the gross negligence by state and local officials and agencies, Mr. Reynolds' constitutional rights were violated and/or restricted. The Defendants created customs, policies, and procedures which were the driving force behind these constitutional violations. These failures by the Defendants knowingly placed Mr. Reynolds in a position of danger from others and failed to protect him from harm. Instead of enforcing laws and prosecuting offenders, this traditional method



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of carrying out their policies and code of silence and ignorance was a direct cause of and/or a contributing factor to the injuries and death of Mr. Reynolds.

As recently as August 18, 2022, in a quote to Fox 45 of Baltimore, Sean Kennedy, with the Maryland Public Policy Institute, said there is little on the line for officers to enforce current laws when the leadership in the city isn't backing it.

"Nobody wants them to enforce the law so instead, they are asking them to babysit and effectively say 'tisk tisk tisk' to the squeegee kids when they step over the line but not actually doing anything about it," Kennedy said. "It's clear until the new state's attorney comes into office, Marilyn Mosby's office won't prosecute any of these crimes. The squeegee kids know worst case scenario, they put in handcuffs and cut loose. They will never see a day in court."

Marilyn Mosby, Baltimore's current State's Attorney, said she doesn't want to see children get arrested just for trying to make a little money, but she is worried that's what her opponents will do.

"The core of both of my opponents' plans is to return to a time of mass incarceration and over policing of Black and brown communities," Mosby said. "They can dress it up with fancy power points, but ultimately, it is a return to failed policies that have left communities of color hollowed and fractured."..."I don't believe in incarcerating or locking up 12-year-olds who are merely on the corner trying to survive, so we have to figure this out," Mosby said. "We can't continue to resort to these failed policies of the past and thinking we are somehow going to see different results. The criminalization of young people, of Black people, it has got to change."

In announcing his 90-day action plan, Mayor Brandon Scott stated:

"Seeing such a large number of young people on corners illustrates our failings as a city. This practice has been part of Baltimore culture for a long time, growing over the last 20 years to become more widespread, visible and divisive. We have to acknowledge the trauma, and challenges our youth that squeegee face," said



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Mayor Brandon M. Scott. "I understand what many of these young men and women are going through. It is crucial that we look at this as a public health matter, look at the underlying factors that cause these young people to squeegee and provide wrap-around services to give them the support they need."

Additionally, Deputy Mayor Faith Leach stated:

"We are looking to develop a strategy that tackles this issue in a way that is humane, measured and addresses the safety and wellbeing of all stakeholders," said Deputy Mayor for Equity, Health, and Human Services Faith Leach. "We know that many of the people who engage in squeegeeing are generating income for their families, be it for bills, toiletries, or the rent. We cannot leave disconnected youth out of the conversation. We have to bring them in and center our strategy around their concerns in order to get to the root of this issue."

Redacted

Please feel free to contact me with any questions, and I look forward to your timely response.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Michael B. Snyder'.

Michael B. Snyder



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Michael B. Snyder