

MARYLAND DEPARTMENT  
OF THE ENVIRONMENT  
1800 Washington Blvd, Suite 6048  
Baltimore, Maryland 21230-1719,

*Plaintiff,*

v.

HOME FREE LEAD INSPECTIONS, LLC  
11605 Crossroads Circle, Suite C  
Baltimore, Maryland 21220,

Serve On:  
David Gillis, Resident Agent  
11605 Crossroads Circle, Suite C  
Baltimore, Maryland 21220,

AND

CHARLES DAVID GILLIS  
216 Leslie Avenue  
Nottingham, Maryland 21236,

AND

DAVID BRIAN GILLIS  
4 Wildwood Avenue  
Baltimore, Maryland 21206,

*Defendants.*

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* BALTIMORE CITY,  
\*  
\* Case No.:

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\*

\* \* \* \* \*

### COMPLAINT FOR CIVIL PENALTIES

The Maryland Department of the Environment ("Department"), by and through its attorneys, files this complaint seeking civil penalties against Home

Free Lead Inspections, LLC, Charles David Gillis, and David Brian Gillis (“Defendants”) for the following reasons:

### **INTRODUCTION**

1. This is an action for civil penalties against Defendants for violations of Maryland’s Reduction of Lead Risk in Housing Regulations (“Lead Regulations”) set forth in Code of Maryland Regulations (“COMAR”) 26.16.01, 26.16.02, and 26.16.05. More specifically, the Department alleges that Charles David Gillis and David Brian Gillis failed to notify the Department prior to performing lead-based paint inspections and failed to properly perform lead-based paint inspections. The Department also alleges that Home Free Lead Inspections, LLC, failed to supervise its inspectors, resulting in the issuance of lead-free inspection certificates for residential properties that contained lead-based paint, and failed to timely submit inspection certificates to the Department. Penalties for violations of the Lead Regulations are up to \$25,000 per violation. Md. Code Ann., Envir. § 6-422(a).

### **JURISDICTION AND VENUE**

2. The Department brings this action pursuant to §§ 6-420 through 6-422, and § 6-1005 of the Environment Article of the Annotated Code of Maryland.

3. This Court is the proper venue for this action under §§ 6-201 and 6-202 of the Courts and Judicial Proceedings Article of the Annotated Code of

Maryland because Defendants engaged in activities relevant to this complaint in Baltimore City, Maryland.

### **PARTIES**

4. Plaintiff is a State agency within the Executive Branch of the State of Maryland. The Secretary of the Environment is charged with responsibility for enforcing the State's comprehensive scheme for the accreditation and oversight of persons performing lead paint abatement services pursuant to Title 6, subtitle 10 of the Environment Article and COMAR 26.16.

5. Home Free Lead Inspections, LLC ("Home Free") was an accredited lead paint inspection contractor at all times relevant to this complaint and regularly conducted business in Baltimore City, Maryland.

6. Charles David Gillis ("C.D. Gillis") was an accredited risk assessor and visual inspector at all times relevant to this complaint and regularly conducted business in Baltimore City, Maryland.

7. David Brian Gillis ("D.B. Gillis") is and, at all times relevant to this complaint, was an accredited risk assessor and regularly conducts business in Baltimore City, Maryland.

### **REGULATORY AUTHORITY**

8. The Maryland Lead Risk Reduction in Housing Act was adopted in 1994 with the goal of reducing the instances of childhood lead poisoning while

maintaining affordable rental housing. Md. Code Ann., Envir. Title 6, subtitle 8. In order to achieve the goals of the Act, the Department regulates all persons who perform lead paint abatement services in properties constructed prior to 1978, which the Legislature has determined are likely to contain lead-based paint. Md. Code Ann., Envir. Title 6, subtitle 10 and COMAR 26.16.

**Training and Accreditation of Persons Who Perform Lead Paint Abatement Services.**

9. In order to ensure that lead paint abatement services are performed in a safe manner and by competent workers and contractors, § 6-1002 of the Environment Article requires contractors, supervisors, inspectors, and trainers to be accredited by the Department. Section 6-1003 of the Environment Article authorizes the Department to issue regulations covering the requirements of such accreditation. Pursuant to this authorization the Department adopted COMAR 26.16.01, .02, and .05.

10. COMAR 26.16.01.02B(9) defines "Lead paint abatement services" to mean risk assessment, inspection, or abatement of lead-containing substances.

11. COMAR 26.16.01.02B(10) defines "Lead paint inspection contractor" to mean a contractor that serves as, or employs, an inspector or lead paint risk assessor.

12. COMAR 26.16.01.02B(19) defines “Provide lead paint abatement services” to mean the engagement in the risk assessment, inspection, or abatement of lead-containing substances.

13. COMAR 26.16.01.02B(4)(a) defines “Contractor” as a company, partnership, corporation, sole proprietorship, association, self-employed individual, or other business entity.

14. COMAR 26.16.01.09A requires that all contractors offering lead paint abatement services must be accredited.

15. Pursuant to COMAR 26.16.01.09I, lead inspection contractors must ensure their employees, agents, and representatives comply with all applicable requirements of 26.16.01 and 40 C.F.R. § 745.227 (as incorporated in COMAR 26.16.01.02-1).

16. COMAR 26.16.02.05H requires that all lead paint inspections must be performed by an accredited lead paint inspector technician or lead paint risk assessor.

17. COMAR 26.16.01.02(11) defines “Lead paint inspector technician” to mean an individual who, as a service, determines the presence of a lead-containing substance through the following techniques: (a) use of a portable XRF analyzer; (b) collection of paint samples for submission to a laboratory for analysis; (c) collection of dust samples for submission to a laboratory for analysis;

(d) use of chemical tests, such as sodium sulphide and sodium rhodizonate; and (e) any other accepted method or technique for determining the lead content in paint.

18. COMAR 26.16.01.02B(14) defines "Lead paint risk assessor" to mean an individual who conducts inspections, interprets information regarding the presence and condition of lead-containing substances, and prepares reports characterizing hazards associated with lead-containing substances.

19. COMAR 26.16.01.09F(1) requires all contractors to comply with all work practice standards set forth in 40 C.F.R. § 745.227 and COMAR 26.16.05 for the performance of inspections and collection of paint and dust samples.

20. COMAR 26.16.05.06 requires that all lead-based paint inspections must be performed in accordance with COMAR 26.16.02.05.

### **Properties Certified Lead Free**

21. Dwelling units certified "lead free" in accordance with § 6-804 of the Environment Article and COMAR 26.16.02.05 are exempt from compliance with the registration and risk reduction requirements set forth in Title 6, subtitle 8.

22. COMAR 26.16.02.05A allows a lead inspection contractor to issue a certificate of lead-free housing after an inspection verifies that all painted interior and exterior surfaces of the property are lead-free. The actual inspection must be

performed by an accredited lead paint inspector technician or lead paint risk assessor. COMAR 26.16.02.05H.

23. Pursuant to COMAR 26.16.05 (Procedures for Performing Lead Abatement Service), lead-based paint inspections must be performed in accordance with COMAR 26.16.02.05 and 40 C.F.R. § 745.227 (as incorporated in COMAR 26.16.05.03).

24. COMAR 26.16.05.04 provides that all persons must provide the Department advance notice before performing an inspection. Notice must be in writing and must be provided by hand delivery, facsimile, or mail and must be received by the Department at least 24 hours before the commencement of the inspection.

25. COMAR 26.16.05.02B(1) defines “lead-based paint inspection” as a surface-by-surface evaluation of every painted surface to determine if the concentration of lead exceeds state standards.

26. In lieu of testing every painted surface in a property, COMAR 26.16.01.09 (incorporating 40 C.F.R. § 745.227 and the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (“HUD Guidelines”)), allows for an alternative method of testing, requiring the accredited lead-paint risk assessor or lead-paint inspector technician to select and test certain representative painted components and testing combinations.

27. A property is lead-free if no painted surfaces on the interior or exterior contain more than 0.50 percent lead by weight or more than 0.7 mg/cm<sup>2</sup>. COMAR 26.16.02.02B(7), (5); COMAR 26.16.01.02B(7). However, as stated above, not every surface of a property must be tested. Instead, the inspector may select certain painted components from each room (i.e., wall, baseboard, and crown molding) with a distinct painting history and then select testing combinations based on the substrate and component type. This allows the inspector to combine like components within a room that have the same painting history (i.e., window casings, stops, jambs, and aprons are a single testing combination).

28. If lead paint is detected, subsequent re-inspection can be conducted by either another XRF reading, paint chip analysis, or a visual review to confirm that the component or paint was either removed or encapsulated. COMAR 26.16.02.05K.

29. COMAR 26.16.02.05L requires that within 10 days of issuing a lead-free certificate, the inspection contractor must submit a copy of the certificate to the Department along with a summary report of inspection results.

30. COMAR 26.16.02.05M requires an inspection contractor to maintain a full report recording all inspection results for a property certified to be lead-free



for a period of five years following issuance of the certificate and provide a copy of this report to the Department upon request.

### **Enforcement and Penalties for Violations of Title 6, Subtitle 10**

31. The provisions of Title 6, subtitle 10 and COMAR 26.16 are enforceable utilizing the remedies set forth in §§ 6-420 through 6-422 and § 7-266(b) of the Environment Article. Md. Code Ann., Envir. § 6-1005.

32. Penalties for violations of Title 6, subtitle 10 of the Environment Article, or any rule or regulation adopted pursuant thereto, are subject to civil penalties up to \$25,000 per violation. Md. Code Ann., Envir. §§ 6-1005 and 6-422.

### **FACTUAL ALLEGATIONS COMMON TO ALL COUNTS**

33. On August 18, 2015, Home Free Lead Inspections, LLC (“Home Free”) was accredited by the Department as a lead paint abatement services contractor (“Lead Contractor”) pursuant to COMAR 26.16.01.09. As a Lead Contractor, Home Free was required to employ persons who were properly accredited by the Department as inspectors and lead paint risk assessors. COMAR 26.16.01.09B(1). In addition, Home Free was required to ensure that its employees complied with all work practice standards set forth in 40 C.F.R. § 745.227, COMAR 26.16.01, and .02 when performing lead-based paint inspections. COMAR 26.16.01.09I.

34. At the time Home Free was initially accredited, it employed C.D. Gillis and D.B. Gillis to perform its lead-based paint inspections. D.B. Gillis was also the owner of Home Free and responsible for the issuance of lead-free inspection certificates by Home Free.

35. C.D. Gillis was accredited by the Department as a visual inspector and inspector technician on August 18, 2015, and as a risk assessor on May 13, 2017. During the time C.D. Gillis was accredited to perform lead paint inspections, he performed approximately 800 lead-free inspections for Home Free.

36. D.B. Gillis was accredited as a visual inspector and inspector technician on August 18, 2015, and as a risk assessor on May 13, 2017. During the years D.B. Gillis was accredited to perform lead-based paint inspections, he performed approximately 100 lead-free inspections for Home Free.

37. On December 18, 2017, the Department received a complaint regarding lead abatement work being performed at 5209 Old Frederick Road, Catonsville, Maryland 21228.

38. On December 19, 2017, Jason Yu, an inspector with the Department's Lead Poisoning Prevention Program, conducted an oversight inspection at 5209 Old Frederick Road. During his inspection, Mr. Yu observed and documented persons performing repairs to painted surfaces in a manner inconsistent with the lead hazard risk reduction provisions set forth in COMAR

26.16. Upon inquiring about the work being performed, Mr. Yu was told that the property had been inspected by Home Free and was found to be lead-free.

39. On December 20, 2017, Mr. Yu received a call from D.B. Gillis, acknowledging that C.D. Gillis had performed a lead-based paint inspection of 5209 Old Frederick Road, but Home Free had not issued a lead-free inspection certificate for that property.

40. On December 20, 2017, Mr. Yu returned to 5207 Old Frederick Road with a portable XRF analyzer to perform a more thorough inspection for lead-based paint. During his oversight inspection, Mr. Yu discovered lead-based paint on several exterior painted surfaces, including many surfaces that were not tested by C.D. Gillis.

41. On January 16, 2018, Mr. Yu requested documentation from Home Free regarding certain lead paint inspections that had been performed by C.D. Gillis and D.B. Gillis.

42. Based on his findings at 5207 Old Frederick Road, and documentation provided by Home Free pursuant to his request, Mr. Yu began investigating lead-free inspection certificates issued by Home Free based on inspections performed by C.D. Gillis and D.B. Gillis.

43. During the period from February 13, 2018, through March 30, 2018, oversight inspections performed by Mr. Yu revealed that C.D. Gillis had

performed inspections at several properties without providing 24-hour advance notice to the Department, in violation of COMAR 26.16.05.04, and without sampling required components and testing combinations pursuant to methodologies required by COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Mr. Yu also discovered that Home Free had issued several lead-free inspection certificates based on inadequate inspections, in violation of COMAR 26.16.02.05A, and failed to timely submit inspection certificates and supporting documentation to the Department, in violation of COMAR 26.16.02.05L. More specifically, Mr. Yu discovered that:

(a) On April 6, 2017, C.D. Gillis performed a lead-based paint inspection at 1726 Pin Oak Road, Baltimore, Maryland 21234. During his inspection, C.D. Gillis identified lead-based paint on several interior painted surfaces. Despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #777036 on April 6, 2017, in violation of COMAR 26.16.02.05A. C.D. Gillis also failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #777036 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. In addition, an oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several interior and exterior painted surfaces during his inspection, in

violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Mr. Yu confirmed that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint;

(b) On May 10, 2017, C.D. Gillis performed a lead-based paint inspection at 7604 Old Harford Road, Baltimore, Maryland 21234. During his inspection, C.D. Gillis identified lead-based paint on several interior and exterior painted surfaces. Despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #770458 on May 10, 2017, in violation of COMAR 26.16.02.05A. C.D. Gillis also failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #770458 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. In addition, an oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several interior and exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Mr. Yu confirmed that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint;

(c) On July 12, 2017, C.D. Gillis performed a lead-based paint inspection at 5519 Clifton Avenue, Baltimore, Maryland 21207. During his inspection, C.D. Gillis identified lead-based paint on several interior and exterior

painted surfaces. Despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #821295 on July 12, 2017, in violation of COMAR 26.16.02.05A. C.D. Gillis also failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #821295 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. In addition, an oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines;

(d) On August 7, 2017, C.D. Gillis performed a lead-based paint inspection at 2814 Hillcrest Avenue, Baltimore, Maryland 21234. During his inspection, C.D. Gillis identified lead-based paint on several interior and exterior painted surfaces. Despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #821292 on August 7, 2017, in violation of COMAR 26.16.02.05A. C.D. Gillis also failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #821292 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. In addition, an oversight inspection performed by Mr. Yu revealed that C.D. Gillis

failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines; and

(e) On August 16, 2017, C.D. Gillis performed a lead-based paint inspection at 1644 Yakona Road, Baltimore, Maryland 21286. During his inspection, C.D. Gillis identified lead-based paint on several interior and exterior painted surfaces. Despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #818471 on August 16, 2017, in violation of COMAR 26.16.02.05A. C.D. Gillis also failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #818471 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. In addition, an oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines.

44. On March 30, 2018, the Department issued an Emergency Suspension of Accreditation to Home Free and C.D. Gillis based on the findings of Mr. Yu's oversight inspections.

45. During the period from March 30, 2018, through September 26, 2018, additional oversight inspections performed by Mr. Yu revealed that C.D. Gillis performed inspections at several properties without sampling components

and without utilizing testing combinations pursuant to methodologies required by COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Mr. Yu also discovered that Home Free had issued several lead-free inspection certificates based on inadequate inspections, in violation of COMAR 26.16.02.05A, and had failed to timely submit inspection certificates, and supporting documentation, to the Department, in violation of COMAR 26.16.02.05L. More specifically, Mr. Yu discovered that:

(a) On August 31, 2017, C.D. Gillis performed a lead-based paint inspection at 109 East Overlea Avenue, Baltimore, Maryland 21206. During his inspection, C.D. Gillis identified lead-based paint on several interior and exterior painted surfaces. Despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #821332, in violation of COMAR 26.16.02.05A. C.D. Gillis also failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #821332 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. In addition, an oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Mr. Yu confirmed



that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint;

(b) On June 24, 2016, C.D. Gillis performed a lead-based paint inspection at 112 East Main Street, Sudlersville, Maryland 21668. Based on the inspection performed by C.D. Gillis on June 24, 2016, Home Free issued Lead-Free Inspection Certificate #746837 on June 24, 2016, in violation of COMAR 26.16.02.05A. C.D. Gillis also failed to provide 24-hour advance notice of his intent to perform a lead inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #746837 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. In addition, an oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Mr. Yu confirmed that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint;

(c) On December 18, 2017, C.D. Gillis performed a lead-based paint inspection at 508 Beaumont Road, Silver Spring, Maryland 20904. An oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Based on the

inspection performed by C.D. Gillis, Home Free issued Lead-Free Inspection Certificate #802044 on December 18, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #802044 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. Yu confirmed that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint.

(d) On September 7, 2017, C.D. Gillis performed a lead-based paint inspection at 2524 Loyola Southway, Unit 1, Baltimore, Maryland 21215. During his inspection, C.D. Gillis identified lead-based paint on exterior painted surfaces. Despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #828891 on September 7, 2017, in violation of COMAR 26.16.02.05A. C.D. Gillis also failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #828891 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. In addition, an oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Mr. Yu

confirmed that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint;

(e) On September 7, 2017, C.D. Gillis performed a lead-based paint inspection at 2524 Loyola Southway, Unit 2, Baltimore, Maryland 21215. During his inspection, C.D. Gillis identified lead-based paint on exterior painted surfaces. Despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #828892 on September 7, 2017, in violation of COMAR 26.16.02.05A. C.D. Gillis also failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #828892 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. In addition, an oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Mr. Yu confirmed that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint;

(f) On January 16, 2017, C.D. Gillis performed a lead-based paint inspection at 3309 Lake Avenue, Baltimore, Maryland 21213. An oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR

26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Based on the inspection performed by C.D. Gillis on January 16, 2017, Home Free issued Lead-Free Inspection Certificate #770433 on January 16, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #770433 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. Mr. Yu confirmed that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint;

(g) On March 9, 2018, C.D. Gillis performed a lead-based paint inspection at 1178 Cleveland Street, Baltimore, Maryland 21230. An oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Based on the inspection performed by C.D. Gillis on March 9, 2018, Home Free issued Lead-Free Inspection Certificate #807748 on March 9, 2018, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #807748 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L;

(h) On January 16, 2017, C.D. Gillis performed a lead-based paint inspection at 3309 Lake Avenue, Baltimore, Maryland 21213. An oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Based on the inspection performed by C.D. Gillis on January 16, 2017, Home Free issued Lead-Free Inspection Certificate #770433 on January 16, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #770433 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. Mr. Yu confirmed that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint; and

(i) On March 7, 2018, C.D. Gillis performed a lead-based paint inspection at 1511 Kenhill Avenue, Baltimore, Maryland 21213. An oversight inspection performed by Mr. Yu revealed that C.D. Gillis failed to test several exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Based on the inspection performed by C.D. Gillis on March 7, 2018, Home Free issued Lead-Free Inspection Certificate #829095 on March 7, 2018, in violation of COMAR

26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #829095 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. Mr. Yu confirmed that several painted surfaces that C.D. Gillis failed to test were positive for lead-based paint.

46. During the period from March 30, 2018 through September 26, 2018, additional oversight inspections performed by Mr. Yu revealed that D.B. Gillis performed inspections at several properties without sampling components and testing combinations pursuant to methodologies required by COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Mr. Yu also discovered that Home Free had issued several lead-free inspection certificates based on inadequate inspections, in violation of COMAR 26.16.02.05A, and failed to timely submit inspection certificates, and supporting documentation, to the Department, in violation of COMAR 26.16.02.05L. More specifically, Mr. Yu discovered that:

(a) On August 23, 2017, D.B. Gillis performed a lead-based paint inspection at 50 Mavista Avenue, Baltimore, Maryland 21222. An oversight inspection performed by Mr. Yu revealed that D.B. Gillis failed to test exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40

C.F.R. § 745.227, and the HUD Guidelines. Based on the inspection performed by D.B. Gillis on August 23, 2017, Home Free issued Lead-Free Inspection Certificate #813354 on August 23, 2017, in violation of COMAR 26.16.02.05A. In addition, D.B. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #813354 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L. Mr. Yu confirmed that painted surfaces that D.B. Gillis failed to test were positive for lead-based paint.;

(b) On August 24, 2017, D.B. Gillis performed a lead-based paint inspection at 3908 South Hanover Street, Baltimore, Maryland 21225. An oversight inspection performed by Mr. Yu revealed that D.B. Gillis failed to test exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Based on the inspection performed by D.B. Gillis on August 24, 2017, Home Free issued Lead-Free Inspection Certificate #813356 on August 24, 2017, in violation of COMAR 26.16.02.05A. In addition, D.B. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #813356 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L.

Mr. Yu confirmed that painted surfaces that D.B. Gillis failed to test were positive for lead-based paint;

(c) On June 23, 2016, D.B. Gillis performed a lead-based paint inspection at 1123 North Mount Street, Baltimore, Maryland 21217. An oversight inspection performed by Mr. Yu revealed that D.B. Gillis failed to test exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Based on the inspection performed by D.B. Gillis on June 23, 2016, Home Free issued Lead-Free Inspection Certificate #746832 on June 23, 2016, in violation of COMAR 26.16.02.05A. In addition, D.B. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04; and

(d) On December 27, 2017, D.B. Gillis performed a lead-based paint inspection at 3527 Reisterstown Road, Baltimore, Maryland 21215. An oversight inspection performed by Mr. Yu revealed that D.B. Gillis failed to test exterior painted surfaces during his inspection, in violation of COMAR 26.16.01.09, 40 C.F.R. § 745.227, and the HUD Guidelines. Based on the inspection performed by D.B. Gillis on December 27, 2017, Home Free issued Lead-Free Inspection Certificate #807756 on December 27, 2017, in violation of COMAR 26.16.02.05A. In addition, D.B. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of



COMAR 26.16.05.04, and Home Free failed to submit Certificate #807756 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L.

47. On or about September 26, 2018, the Department hired ARC Environmental (“ARC”), a third party independent accredited inspection contractor, to perform lead paint inspections as part of its investigation into the validity of lead-free inspection certificates issued by Home Free based on inspections performed by C.D. Gillis and D.B. Gillis. During the period from September 26, 2018, through June 28, 2019, ARC performed lead paint inspections at 215 properties, identifying lead-based paint at 147 of the 215 properties it inspected.

48. During its inspections, ARC documented lead painted surfaces at the following properties that had been inspected by D.B. Gillis or C.D. Gillis, and certified lead-free by Home Free, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, the HUD Guidelines, and COMAR 26.16.02.05A, including:

(a) On December 20, 2016, D.B. Gillis performed a lead-based paint inspection at 3337 Gwynn Falls Parkway, Baltimore, Maryland 21216. Testing performed by ARC revealed that the following components contained lead-based paint and were not tested by D.B. Gillis during his December 20, 2016 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Second Floor Rear Right Bedroom Window Well  
Second Floor Rear Left Bedroom Window Well  
Second Floor Rear Bathroom Window Well  
Second Floor Front Bathroom Window Well  
Basement Window Casing  
Rear Exterior Threshold, Wall Surface  
Rear Exterior Porch Floor, Porch Ceiling, Soffit

Based on the inspection performed by D.B. Gillis on December 20, 2016, Home Free issued Lead-Free Inspection Certificate #779686 on December 20, 2016, in violation of COMAR 26.16.02.05A. In addition, D.B. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04;

(b) On August 29, 2017, C.D. Gillis performed a lead-based paint inspection at 6771 Woodley Road, Baltimore, Maryland 21222. Testing performed by ARC revealed that the following components contained lead-based paint and were not tested by C.D. Gillis during his August 29, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Rear Exterior Door Casing  
Front Porch Floor  
Front Porch Awning

Based on the inspection performed by C.D. Gillis on August 29, 2017, Home Free issued Lead-Free Inspection Certificate #813417 on August 29, 2017, in violation of COMAR 26.16.02.05A. In addition, D.B. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in

violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #813417 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L;

(c) On August 28, 2017, D.B. Gillis performed a lead-based paint inspection at 397 Oriole Lane, Baltimore, Maryland 21224. Testing performed by ARC revealed that the following components contained lead-based paint and were not tested by D.B. Gillis during his August 28, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Rear Exterior Guardrail, Handrail, Door Casing  
Rear Exterior Foundation Walls  
Fence Posts  
Utility Access Panel

Based on the inspection performed by D.B. Gillis on August 28, 2017, Home Free issued Lead-Free Inspection Certificate #813370 on August 28, 2017, in violation of COMAR 26.16.02.05A. In addition, D.B. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04;

(d) On March 9, 2018, C.D. Gillis performed a lead-based paint inspection at 1178 Cleveland Street, Baltimore, Maryland 21230. Testing performed by ARC revealed that the front exterior cornice contained lead-based paint and was not tested by C.D. Gillis during his March 9, 2018 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines.

Based on the inspection performed by C.D. Gillis on March 9, 2018, Home Free issued Lead-Free Inspection Certificate #807748 on March 9, 2018, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #807748 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L;

(e) On May 9, 2017, C.D. Gillis performed a lead-based paint inspection at 634 Dumbarton Avenue, Baltimore, Maryland 21218, during which he identified many interior painted surfaces that were positive for lead-based paint. Testing performed by ARC revealed that the following components contained lead-based paint and were not tested by C.D. Gillis during his May 9, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

- Bathroom Baseboard
- Front Exterior Fascia
- Rear Exterior Gutter
- Rear Exterior Fascia
- Rear Exterior Threshold

Based on the inspection performed by C.D. Gillis on May 9, 2017, despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #816061 on May 9, 2017, in violation of COMAR 26.16.02.05A. In

addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #813417 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L;

(f) On May 12, 2017, C.D. Gillis performed a lead-based paint inspection at 1131 West Hamburg Street, Baltimore, Maryland 21230, during which he identified many interior painted surfaces that were positive for lead-based paint. Testing performed by ARC revealed that the following additional components contained lead-based paint and had not been tested by C.D. Gillis during his May 12, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Dining Room Radiator  
Front Exterior Cornice  
Rear Exterior Sewer Vent Pipe  
Rear Exterior Fence

Based on the inspection performed by C.D. Gillis on May 12, 2017, despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #816026 on May 12, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #816026 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L;

(g) On November 17, 2017, C.D. Gillis performed a lead-based paint inspection at 6752 Woodley Road, Baltimore, Maryland 21222, during which he identified many interior painted surfaces that were positive for lead-based paint. Testing performed by ARC revealed that the following components contained lead-based paint and were not tested by C.D. Gillis during his November 17, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Foyer Wall Surfaces  
Foyer Floor  
Front Exterior Door Lintel

Based on the inspection performed by C.D. Gillis on November 17, 2017, despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #802097 on November 19, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #802097 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L;

(h) On March 21, 2017, C.D. Gillis performed a lead-based paint inspection at 701 Denison Street, Baltimore, Maryland 21229, during which he identified many interior painted surfaces that were positive for lead-based paint. Testing performed by ARC revealed that the following components contained

lead-based paint and were not tested by C.D. Gillis during his March 21, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Second Floor Bathroom Skylight Casing  
Basement Stair Risers  
Front Exterior Roof Cornice

Based on the inspection performed by C.D. Gillis on March 21, 2017, despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #776969 on May 10, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04;

(i) On August 11, 2017, C.D. Gillis performed a lead-based paint inspection at 2812 Oswego Avenue, Baltimore, Maryland 21215. Testing performed by ARC revealed that the following components contained lead-based paint and were not tested by C.D. Gillis during his August 11, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Recreation Room Door Jamb  
Front Exterior Basement Wall Surface  
Right Exterior Basement Stair Wall  
Rear Exterior Door Casing & Jamb  
Rear Exterior Basement Stair Wall  
Rear Exterior Basement Window Casing, Well, Lintel  
Rear Exterior Basement Wall Surface  
Rear Exterior Porch Pipe

Based on the inspection performed by C.D. Gillis on August 11, 2017, Home Free issued Lead-Free Inspection Certificate #821296 on August 11, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #821296 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L;

(j) On November 10, 2017, C.D. Gillis performed a lead-based paint inspection at 8615 Chestnut Oak Road, Baltimore, Maryland 21234. Testing performed by ARC revealed that the following components contained lead-based paint and were not tested by C.D. Gillis during his November 10, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Interior Stair Stringers, Handrail, Baseboard, Floor Support  
Hallway Closet Wall  
Right Rear Bedroom Shelf Support  
Basement Stairs Door Jamb

Based on the inspection performed by C.D. Gillis on November 10, 2017, Home Free issued Lead-Free Inspection Certificate #804216 on November 10, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit



Certificate #804216 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L;

(k) On July 20, 2017, C.D. Gillis performed a lead-based paint inspection at 1709 Red Oak Road, Baltimore, Maryland 21234, during which he identified many interior painted surfaces that were positive for lead-based paint. Testing performed by ARC revealed that the following components contained lead-based paint and were not tested by C.D. Gillis during his July 20, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Second Floor Bathroom Shelf Support  
Interior Stair Stringers, Baseboards, Floor Support

Based on the inspection performed by C.D. Gillis on July 20, 2017, despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #813371 on July 20, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #813371 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L;

(l) On December 28, 2017, C.D. Gillis performed a lead-based paint inspection at 1002 South Belnord Avenue, Baltimore, Maryland 21224. Testing performed by ARC revealed that the following components contained

lead-based paint and were not tested by C.D. Gillis during his December 28, 2017 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Front Exterior Door Transom  
Basement Door Jambs  
Window Casings  
Basement Bathroom Door Surface, Casing and Jamb

Based on the inspection performed by C.D. Gillis on December 28, 2017, Home Free issued Lead-Free Inspection Certificate #804260 on December 28, 2017, in violation of COMAR 26.16.02.05A. In addition, C.D. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04, and Home Free failed to submit Certificate #804260 to the Department within 10 days of its issuance, in violation of COMAR 26.16.02.05L; and

(m) On December 31, 2016, D.B. Gillis performed a lead-based paint inspection at 3903 58th Avenue, Hyattsville, Maryland 20784, during which he identified interior painted surfaces that were positive for lead-based paint. Testing performed by ARC revealed that the following components contained lead-based paint and were not tested by D.B. Gillis during his December 31, 2016 inspection, in violation of COMAR 26.16.05.06, 40 C.F.R. § 745.227, and the HUD Guidelines:

Kitchen Ceiling  
Exterior Window Casings and Sashes  
Basement Wall Surfaces  
First Floor Bathroom Wall Surfaces  
Kitchen Wall Surfaces

Based on the inspection performed by D.B. Gillis on December 31, 2016, despite having identified lead-based paint, Home Free issued Lead-Free Inspection Certificate #779697 on December 31, 2016, in violation of COMAR 26.16.02.05A. In addition, D.B. Gillis failed to provide 24-hour advance notice of his intent to perform a lead-based paint inspection, in violation of COMAR 26.16.05.04.

49. Exposure to environmental lead due to the presence of lead paint in residential properties is known to cause serious and irreversible injury to human health. The failure of C.D. Gillis and D.B. Gillis to properly perform lead paint inspections, Home Free's failure to ensure C.D. Gillis and D.B. Gillis were complying with all applicable regulations, and Home Free's issuance of lead-free inspection certificates based on those inspections, creates a potential danger to human health.

#### **COUNT I**

#### **MDE v. Charles David Gillis – Failure to Provide 24-Hour Notice of Lead Inspection (COMAR 26.16.05.04)**

50. The Department realleges and incorporates by reference the allegations of all prior paragraphs of this Complaint.

51. COMAR 26.16.05.04 provides that all persons must provide the Department advance notice before performing an inspection. Notice must be in writing and must be provided by hand delivery, facsimile, or mail and shall be received by the Department at least 24 hours before the commencement of the inspection.

52. Charles David Gillis violated COMAR 26.16.05.04 when he failed to provide at least 24-hour advance notice to the Department of his intent to perform lead-based paint inspections the following addresses, resulting in the issuance of the following lead-free inspection certificates:

Property Address: 1726 Pin Oak Road, Baltimore, Maryland 21234  
Certificate No.: 777036  
Date of Issuance: April 6, 2017

Property Address: 7604 Old Harford Road, Baltimore, Maryland 21234  
Certificate No.: 770458  
Date of Issuance: May 10, 2017

Property Address: 5519 Clifton Avenue, Baltimore, Maryland 21207  
Certificate No.: 821295  
Date of Issuance: July 12, 2017

Property Address: 2814 Hillcrest Avenue, Baltimore, Maryland 21234  
Certificate No.: 821292  
Date of Issuance: August 7, 2017

Property Address: 1644 Yakona Road, Baltimore, Maryland 21286  
Certificate No.: 818471  
Date of Issuance: August 16, 2017

Property Address: 109 East Overlea Avenue, Baltimore, Maryland 21206  
Certificate No.: 821332  
Date of Issuance: August 31, 2017

Property Address: 112 East Main Street, Sudlersville, Maryland, 21668  
Certificate No.: 746837  
Date of Issuance: June 24, 2016

Property Address: 508 Beaumont Road, Silver Spring, Maryland 20904  
Certificate No.: 802044  
Date of Issuance: December 18, 2017

Property Address: 2524 Loyola Swy., Unit 1, Baltimore, Maryland 21215  
Certificate No.: 828891  
Date of Issuance: September 7, 2017

Property Address: 2524 Loyola Swy., Unit 2, Baltimore, Maryland 21215  
Certificate No.: 828892  
Date of Issuance: September 7, 2017

Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017

Property Address: 1178 Cleveland Street, Baltimore, Maryland 21230  
Certificate No.: 807748  
Date of Issuance: March 9, 2018

Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017

Property Address: 1511 Kenhill Avenue, Baltimore, Maryland 21213  
Certificate No.: 829095  
Date of Issuance: March 7, 2018

Property Address: 1178 Cleveland Street, Baltimore, Maryland 21230  
Certificate No.: 807748  
Date of Issuance: March 9, 2018

Property Address: 634 Dumbarton Avenue, Baltimore, Maryland 21218  
Certificate No.: 816061  
Date of Issuance: May 9, 2017

Property Address: 1131 W. Hamburg Street, Baltimore, Maryland 21230  
Certificate No.: 816026  
Date of Issuance: May 12, 2017

Property Address: 6752 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 802097  
Date of Issuance: November 17, 2017

Property Address: 701 Denison Street, Baltimore, Maryland 21229  
Certificate No.: 776969  
Date of Issuance: March 21, 2017

Property Address: 2812 Oswego Avenue, Baltimore, Maryland 21215  
Certificate No.: 821296  
Date of Issuance: August 11, 2017

Property Address: 8615 Chestnut Oak Road, Baltimore, Maryland 21234  
Certificate No.: 804216  
Date of Issuance: November 10, 2017

Property Address: 1709 Red Oak Road, Baltimore, Maryland 21234  
Certificate No.: 813371  
Date of Issuance: July 20, 2017

Property Address: 1002 S. Belnord Avenue, Baltimore, Maryland 21224  
Certificate No.: 804260  
Date of Issuance: December 28, 2017

53. Sections 6-1005 and 6-422 of the Environment Article vest this Court with the authority to assess civil penalties against Charles David Gillis up to \$25,000 per violation.

**COUNT II**

**MDE v. Charles David Gillis – Failure to Adequately Inspect Properties for the Presence of Lead-Based Paint (COMAR 26.16.05.06)**

54. The Department realleges and incorporates by reference the allegations of all prior paragraphs of this Complaint.

55. Pursuant to COMAR 26.16.05 (Procedures for Performing Lead Abatement Services), lead-based paint inspections must be performed in accordance with COMAR 26.16.02.05 and 40 C.F.R. § 745.227 (as incorporated in COMAR 26.16.05.03).

56. Pursuant to 40 C.F.R. § 745.227, through the incorporation of the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, if the accredited lead inspector chooses not to test every painted surface in a property, he or she must select components and testing combinations pursuant to methodologies required by the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing.

57. Charles David Gillis failed to test all painted surfaces, and failed to utilize the required methodologies for determining the location and number of painted surfaces to test, when conducting lead paint inspections at the following addresses, in violation of COMAR 26.16.05.06, resulting in the issuance of the following lead-free inspection certificates for properties that contained lead-based paint:

Property Address: 1726 Pin Oak Road, Baltimore, Maryland 21234  
Certificate No.: 777036  
Date of Issuance: April 6, 2017

Property Address: 7604 Old Harford Road, Baltimore, Maryland 21234  
Certificate No.: 770458  
Date of Issuance: May 10, 2017

Property Address: 5519 Clifton Avenue, Baltimore, Maryland 21207  
Certificate No.: 821295  
Date of Issuance: July 12, 2017

Property Address: 2814 Hillcrest Avenue, Baltimore, Maryland 21234  
Certificate No.: 821292  
Date of Issuance: August 7, 2017

Property Address: 1644 Yakona Road, Baltimore, Maryland 21286  
Certificate No.: 818471  
Date of Issuance: August 16, 2017

Property Address: 109 East Overlea Avenue, Baltimore, Maryland 21206  
Certificate No.: 821332  
Date of Issuance: August 31, 2017

Property Address: 112 East Main Street, Sudlersville, Maryland, 21668  
Certificate No.: 746837  
Date of Issuance: June 24, 2016

Property Address: 508 Beaumont Road, Silver Spring, Maryland 20904  
Certificate No.: 802044  
Date of Issuance: December 18, 2017

Property Address: 2524 Loyola Swy., Unit 1, Baltimore, Maryland 21215  
Certificate No.: 828891  
Date of Issuance: September 7, 2017

Property Address: 2524 Loyola Swy., Unit 2, Baltimore, Maryland 21215  
Certificate No.: 828892  
Date of Issuance: September 7, 2017



Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017

Property Address: 1178 Cleveland Street, Baltimore, Maryland 21230  
Certificate No.: 807748  
Date of Issuance: March 9, 2018

Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017

Property Address: 1511 Kenhill Avenue, Baltimore, Maryland 21213  
Certificate No.: 829095  
Date of Issuance: March 7, 2018

Property Address: 1178 Cleveland Street, Baltimore, Maryland 21230  
Certificate No.: 807748  
Date of Issuance: March 9, 2018

Property Address: 634 Dumbarton Avenue, Baltimore, Maryland 21218  
Certificate No.: 816061  
Date of Issuance: May 9, 2017

Property Address: 1131 W. Hamburg Street, Baltimore, Maryland 21230  
Certificate No.: 816026  
Date of Issuance: May 12, 2017

Property Address: 6752 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 802097  
Date of Issuance: November 17, 2017

Property Address: 701 Denison Street, Baltimore, Maryland 21229  
Certificate No.: 776969  
Date of Issuance: March 21, 2017

Property Address: 2812 Oswego Avenue, Baltimore, Maryland 21215  
Certificate No.: 821296  
Date of Issuance: August 11, 2017

Property Address: 8615 Chestnut Oak Road, Baltimore, Maryland 21234  
Certificate No.: 804216  
Date of Issuance: November 10, 2017

Property Address: 1709 Red Oak Road, Baltimore, Maryland 21234  
Certificate No.: 813371  
Date of Issuance: July 20, 2017

Property Address: 1002 S. Belnord Avenue, Baltimore, Maryland 21224  
Certificate No.: 804260  
Date of Issuance: December 28, 2017

58. Sections 6-1005 and 6-422 of the Environment Article vest this Court with the authority to assess civil penalties against Charles David Gillis up to \$25,000 per violation.

### **COUNT III**

#### **MDE v. David Brian Gillis – Failure to Provide 24-Hour Notice of Lead Inspection (COMAR 26.16.05.04)**

59. The Department realleges and incorporates by reference the allegations of all prior paragraphs of this Complaint.

60. COMAR 26.16.05.04 provides that all persons must provide the Department advance notice before performing an inspection. Notice must be in writing and must be provided by hand delivery, facsimile, or mail and must be received by the Department at least 24 hours before the commencement of the inspection.

61. David Brian Gillis violated COMAR 26.16.05.04 when he failed to provide at least 24-hour advance notice to the Department of his intent to perform

lead-based paint inspections the following addresses, resulting in the issuance of the following lead-free inspection certificates:

Property Address: 50 Mavista Avenue, Baltimore, Maryland 21222  
Certificate No.: 813354  
Date of Issuance: August 23, 2017

Property Address: 3908 S. Hanover Street Baltimore, Maryland 21225  
Certificate No.: 813356  
Date of Issuance: August 24, 2017

Property Address: 1123 North Mount Street, Baltimore, Maryland 21217  
Certificate No.: 746832  
Date of Issuance: June 23, 2016

Property Address: 3527 Reisterstown Road, Baltimore, Maryland 21215  
Certificate No.: 807756  
Date of Issuance: December 27, 2017

Property Address: 3337 Gwynn Falls Pwy., Baltimore, Maryland 21216  
Certificate No.: 779686  
Date of Issuance: December 20, 2016

Property Address: 6771 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 813417  
Date of Issuance: August 29, 2017

Property Address: 397 Oriole Lane, Baltimore, Maryland 21224  
Certificate No.: 813370  
Date of Issuance: August 28, 2017

Property Address: 3903 58<sup>th</sup> Avenue, Hyattsville, Maryland 20784  
Certificate No.: 779697  
Date of Issuance: December 31, 2016

62. Sections 6-1005 and 6-422 of the Environment Article vest this Court with the authority to assess civil penalties against David Brian Gillis up to \$25,000 per violation.

#### **COUNT IV**

#### **(MDE v. David Brian Gillis – Failure to Adequately Inspect Properties for the Presence of Lead-Based Paint COMAR 26.16.05.06)**

63. The Department realleges and incorporates by reference the allegations of all prior paragraphs of this Complaint.

64. Pursuant to COMAR 26.16.05 (Procedures for Performing Lead Abatement Services), lead-based paint inspections must be performed in accordance with COMAR 26.16.02.05 and 40 C.F.R. § 745.227 (as incorporated in COMAR 26.16.05.03).

65. Pursuant to 40 C.F.R. § 745.227, through the incorporation of the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, if the accredited lead inspector chooses not to test every painted surface in a property, he or she must select components and testing combinations pursuant to methodologies required by HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing.

66. David Brian Gillis failed to test all painted surfaces, and failed to utilize the required methodologies for determining the location and number of painted surfaces to test, when conducting lead paint inspections at the following

addresses, in violation of COMAR 26.16.05.06, resulting in the issuance of the following lead-free inspection certificates for properties that contained lead-based paint:

Property Address: 50 Mavista Avenue, Baltimore, Maryland 21222  
Certificate No.: 813354  
Date of Issuance: August 23, 2017

Property Address: 3908 S. Hanover Street, Baltimore, Maryland 21225  
Certificate No.: 813356  
Date of Issuance: August 24, 2017

Property Address: 1123 North Mount Street, Baltimore, Maryland 21217  
Certificate No.: 746832  
Date of Issuance: June 23, 2016

Property Address: 3527 Reisterstown Road, Baltimore, Maryland 21215  
Certificate No.: 807756  
Date of Issuance: December 27, 2017

Property Address: 3337 Gwynn Falls Pwy., Baltimore, Maryland 21216  
Certificate No.: 779686  
Date of Issuance: December 20, 2016

Property Address: 6771 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 813417  
Date of Issuance: August 29, 2017

Property Address: 397 Oriole Lane, Baltimore, Maryland 21224  
Certificate No.: 813370  
Date of Issuance: August 28, 2017

Property Address: 3903 58<sup>th</sup> Avenue, Hyattsville, Maryland 20784  
Certificate No.: 779697  
Date of Issuance: December 31, 2016

67. Sections 6-1005 and 6-422 of the Environment Article vest this Court with the authority to assess civil penalties against David Brian Gillis up to \$25,000 per violation.

**COUNT V**

**MDE v. Home Free Lead Inspections, LLC – Failure to Ensure Its Inspectors Performed Proper Lead-Paint Inspections (COMAR 26.16.01.09I)**

68. The Department realleges and incorporates by reference the allegations of all prior paragraphs of this Complaint.

69. Pursuant to COMAR 26.16.01.09I, lead inspection contractors must ensure that their employees, agents, and representatives comply with all applicable requirements of 26.16.01, 26.16.02, and 40 C.F.R. § 745.227 (as incorporated in COMAR 26.16.01.02-1).

70. Pursuant to 40 C.F.R. § 745.227, through the incorporation of the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, if the accredited lead inspector chooses not to test every painted surface in a property, he or she must select components and testing combinations pursuant to methodologies required by HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing.

71. Home Free Lead Inspections, LLC failed to ensure that Charles David Gillis performed lead-based paint inspections in conformance with 40 C.F.R. § 745.227 and the HUD Guidelines for the Evaluation and Control of Lead-

Based Paint Hazards in Housing when inspecting the following residential properties, in violation of COMAR 26.16.01.09I:

Property Address: 1726 Pin Oak Road, Baltimore, Maryland 21234  
Certificate No.: 777036  
Date of Issuance: April 6, 2017

Property Address: 7604 Old Harford Road, Baltimore, Maryland 21234  
Certificate No.: 770458  
Date of Issuance: May 10, 2017

Property Address: 5519 Clifton Avenue, Baltimore, Maryland 21207  
Certificate No.: 821295  
Date of Issuance: July 12, 2017

Property Address: 2814 Hillcrest Avenue, Baltimore, Maryland 21234  
Certificate No.: 821292  
Date of Issuance: August 7, 2017

Property Address: 1644 Yakona Road, Baltimore, Maryland 21286  
Certificate No.: 818471  
Date of Issuance: August 16, 2017

Property Address: 109 East Overlea Avenue, Baltimore, Maryland 21206  
Certificate No.: 821332  
Date of Issuance: August 31, 2017

Property Address: 112 East Main Street, Sudlersville, Maryland, 21668  
Certificate No.: 746837  
Date of Issuance: June 24, 2016

Property Address: 508 Beaumont Road, Silver Spring, Maryland 20904  
Certificate No.: 802044  
Date of Issuance: December 18, 2017

Property Address: 2524 Loyola Swy., Unit 1, Baltimore, Maryland 21215  
Certificate No.: 828891  
Date of Issuance: September 7, 2017

Property Address: 2524 Loyola Swy., Unit 2, Baltimore, Maryland 21215  
Certificate No.: 828892  
Date of Issuance: September 7, 2017

Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017

Property Address: 1178 Cleveland Street, Baltimore, Maryland 21230  
Certificate No.: 807748  
Date of Issuance: March 9, 2018

Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017

Property Address: 1511 Kenhill Avenue, Baltimore, Maryland 21213  
Certificate No.: 829095  
Date of Issuance: March 7, 2018

Property Address: 1178 Cleveland Street, Baltimore, Maryland 21230  
Certificate No.: 807748  
Date of Issuance: March 9, 2018

Property Address: 634 Dumbarton Avenue, Baltimore, Maryland 21218  
Certificate No.: 816061  
Date of Issuance: May 9, 2017

Property Address: 1131 W. Hamburg Street, Baltimore, Maryland 21230  
Certificate No.: 816026  
Date of Issuance: May 12, 2017

Property Address: 6752 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 802097  
Date of Issuance: November 17, 2017

Property Address: 701 Denison Street, Baltimore, Maryland 21229,  
Certificate No.: 776969  
Date of Issuance: March 21, 2017



Property Address: 2812 Oswego Avenue, Baltimore, Maryland 21215  
Certificate No.: 821296  
Date of Issuance: August 11, 2017

Property Address: 8615 Chestnut Oak Road, Baltimore, Maryland 21234  
Certificate No.: 804216  
Date of Issuance: November 10, 2017

Property Address: 1709 Red Oak Road, Baltimore, Maryland 21234  
Certificate No.: 813371  
Date of Issuance: July 20, 2017

Property Address: 1002 S. Belnord Avenue, Baltimore, Maryland 21224  
Certificate No.: 804260  
Date of Issuance: December 28, 2017

72. Home Free Lead Inspections, LLC failed to ensure that David Brian Gillis performed lead paint inspections in conformance with 40 C.F.R. § 745.227 and the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing when inspecting the following residential properties, in violation of COMAR 26.16.01.09I:

Property Address: 50 Mavista Avenue, Baltimore, Maryland 21222  
Certificate No.: 813354  
Date of Issuance: August 23, 2017

Property Address: 3908 S. Hanover Street, Baltimore, Maryland 21225  
Certificate No.: 813356  
Date of Issuance: August 24, 2017

Property Address: 1123 North Mount Street, Baltimore, Maryland 21217  
Certificate No.: 746832  
Date of Issuance: June 23, 2016

Property Address: 3527 Reisterstown Road, Baltimore, Maryland 21215  
Certificate No.: 807756  
Date of Issuance: December 27, 2017

Property Address: 3337 Gwynn Falls Pkwy., Baltimore, Maryland 21216  
Certificate No.: 779686  
Date of Issuance: December 20, 2016

Property Address: 6771 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 813417  
Date of Issuance: August 29, 2017

Property Address: 397 Oriole Lane, Baltimore, Maryland 21224  
Certificate No.: 813370  
Date of Issuance: August 28, 2017

Property Address: 3903 58<sup>th</sup> Avenue, Hyattsville, Maryland 20784  
Certificate No.: 779697  
Date of Issuance: December 31, 2016

73. Sections 6-1005 and 6-422 of the Environment Article vest this Court with the authority to assess civil penalties against Home Free Lead Inspections, LLC up to \$25,000 per violation.

#### **COUNT VI**

#### **MDE v. Home Free Lead Inspections, LLC – Failure to Timely Submit Lead Inspection Documents (COMAR 26.16.02.05L)**

74. The Department realleges and incorporates by reference the allegations of all prior paragraphs of this Complaint.

75. COMAR 26.16.02.05L requires that within 10 days of issuing a lead-free certificate, the inspection contractor must submit a copy of the certificate to the Department along with a summary report of inspection results.

76. Home Free Lead Inspections, LLC violated COMAR 26.16.02.05L when it failed to submit the following lead inspection certificates and summary reports of inspection results to the Department within 10 days of their issuance:

Property Address: 1726 Pin Oak Road, Baltimore, Maryland 21234  
Certificate No.: 777036  
Date of Issuance: April 6, 2017

Property Address: 7604 Old Harford Road, Baltimore, Maryland 21234  
Certificate No.: 770458  
Date of Issuance: May 10, 2017

Property Address: 5519 Clifton Avenue, Baltimore, Maryland 21207  
Certificate No.: 821295  
Date of Issuance: July 12, 2017

Property Address: 2814 Hillcrest Avenue, Baltimore, Maryland 21234  
Certificate No.: 821292  
Date of Issuance: August 7, 2017

Property Address: 1644 Yakona Road, Baltimore, Maryland 21286  
Certificate No.: 818471  
Date of Issuance: August 16, 2017

Property Address: 109 East Overlea Avenue, Baltimore, Maryland 21206  
Certificate No.: 821332  
Date of Issuance: August 31, 2017

Property Address: 112 East Main Street, Sudlersville, Maryland, 21668  
Certificate No.: 746837  
Date of Issuance: June 24, 2016

Property Address: 508 Beaumont Road, Silver Spring, Maryland 20904  
Certificate No.: 802044  
Date of Issuance: December 18, 2017

Property Address: 2524 Loyola Swy., Unit 1, Baltimore, Maryland 21215  
Certificate No.: 828891  
Date of Issuance: September 7, 2017

Property Address: 2524 Loyola Swy., Unit 2, Baltimore, Maryland 21215  
Certificate No.: 828892  
Date of Issuance: September 7, 2017

Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017

Property Address: 1178 Cleveland Street, Baltimore, Maryland 21230  
Certificate No.: 807748  
Date of Issuance: March 9, 2018

Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017

Property Address: 1511 Kenhill Avenue, Baltimore, Maryland 21213  
Certificate No.: 829095  
Date of Issuance: March 7, 2018

Property Address: 1178 Cleveland Street, Baltimore, Maryland 21230  
Certificate No.: 807748  
Date of Issuance: March 9, 2018

Property Address: 634 Dumbarton Avenue, Baltimore, Maryland 21218  
Certificate No.: 816061  
Date of Issuance: May 9, 2017

Property Address: 1131 W. Hamburg Street, Baltimore, Maryland 21230  
Certificate No.: 816026  
Date of Issuance: May 12, 2017

Property Address: 6752 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 802097  
Date of Issuance: November 17, 2017

Property Address: 701 Denison Street, Baltimore, Maryland 21229,  
Certificate No.: 776969  
Date of Issuance: March 21, 2017

Property Address: 2812 Oswego Avenue, Baltimore, Maryland 21215  
Certificate No.: 821296  
Date of Issuance: August 11, 2017

Property Address: 8615 Chestnut Oak Road, Baltimore, Maryland 21234  
Certificate No.: 804216  
Date of Issuance: November 10, 2017

Property Address: 1709 Red Oak Road, Baltimore, Maryland 21234  
Certificate No.: 813371  
Date of Issuance: July 20, 2017

Property Address: 1002 S. Belnord Avenue, Baltimore, Maryland 21224  
Certificate No.: 804260  
Date of Issuance: December 28, 2017

Property Address: 50 Mavista Avenue, Baltimore, Maryland 21222  
Certificate No.: 813354  
Date of Issuance: August 23, 2017

Property Address: 3908 S. Hanover Street, Baltimore, Maryland 21225  
Certificate No.: 813356  
Date of Issuance: August 24, 2017

Property Address: 1123 North Mount Street, Baltimore, Maryland 21217  
Certificate No.: 746832  
Date of Issuance: June 23, 2016

Property Address: 3527 Reisterstown Road, Baltimore, Maryland 21215  
Certificate No.: 807756  
Date of Issuance: December 27, 2017

Property Address: 3337 Gwynn Falls Pkwy., Baltimore, Maryland 21216  
Certificate No.: 779686  
Date of Issuance: December 20, 2016

Property Address: 6771 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 813417  
Date of Issuance: August 29, 2017

Property Address: 397 Oriole Lane, Baltimore, Maryland 21224  
Certificate No.: 813370  
Date of Issuance: August 28, 2017

Property Address: 3903 58<sup>th</sup> Avenue, Hyattsville, Maryland 20784  
Certificate No.: 779697  
Date of Issuance: December 31, 2016

77. Sections 6-1005 and 6-422 of the Environment Article vest this Court with the authority to assess civil penalties against Home Free Lead Inspections, LLC up to \$25,000 per violation.

#### **COUNT VII**

#### **MDE v. Home Free Lead Inspections, LLC – Issuance of Lead-Free Inspection Certificates for Properties that Contain Lead-Based Paint (COMAR 26.16.02.05A)**

78. The Department realleges and incorporates by reference the allegations of all prior paragraphs of this Complaint.

79. Pursuant to COMAR 26.16.02.05A, an accredited lead paint inspection contractor may issue a certificate of lead-free housing after an inspection verifies that all painted interior and exterior surfaces of an affected property are free of lead-based paint.

80. Home Free Lead Inspections, LLC violated COMAR 26.16.02.05A when it issued lead-free inspection certificates for the following residential

properties based on inspections performed by Charles David Gills and David Brian Gillis that revealed the presence of lead-based paint:

Property Address: 1726 Pin Oak Road, Baltimore, Maryland 21234  
Certificate No.: 777036  
Date of Issuance: April 6, 2017

Property Address: 7604 Old Harford Road, Baltimore, Maryland 21234  
Certificate No.: 770458  
Date of Issuance: May 10, 2017

Property Address: 5519 Clifton Avenue, Baltimore, Maryland 21207  
Certificate No.: 821295  
Date of Issuance: July 12, 2017

Property Address: 2814 Hillcrest Avenue, Baltimore, Maryland 21234  
Certificate No.: 821292  
Date of Issuance: August 7, 2017

Property Address: 1644 Yakona Road, Baltimore, Maryland 21286  
Certificate No.: 818471  
Date of Issuance: August 16, 2017

Property Address: 109 East Overlea Avenue, Baltimore, Maryland 21206  
Certificate No.: 821332  
Date of Issuance: August 31, 2017

Property Address: 2524 Loyola Swy., Unit 1, Baltimore, Maryland 21215  
Certificate No.: 828891  
Date of Issuance: September 7, 2017

Property Address: 2524 Loyola Swy., Unit 2, Baltimore, Maryland 21215  
Certificate No.: 828892  
Date of Issuance: September 7, 2017

Property Address: 634 Dumbarton Avenue, Baltimore, Maryland 21218  
Certificate No.: 816061  
Date of Issuance: May 9, 2017

Property Address: 1131 W. Hamburg Street, Baltimore, Maryland 21230  
Certificate No.: 816026  
Date of Issuance: May 12, 2017

Property Address: 6752 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 802097  
Date of Issuance: November 17, 2017

Property Address: 701 Denison Street, Baltimore, Maryland 21229  
Certificate No.: 776969  
Date of Issuance: March 21, 2017

Property Address: 1709 Red Oak Road, Baltimore, Maryland 21234  
Certificate No.: 813371  
Date of Issuance: July 20, 2017

Property Address: 3903 58<sup>th</sup> Avenue, Hyattsville, Maryland 20784  
Certificate No.: 779697  
Date of Issuance: December 31, 2016

81. Home Free Lead Inspections, LLC violated COMAR 26.16.02.05A when it issued lead-free inspection certificates for the following residential properties based on the incomplete inspections performed by Charles David Gills and David Brian Gillis:

Property Address: 112 East Main Street, Sudlersville, Maryland, 21668  
Certificate No.: 746837  
Date of Issuance: June 24, 2016

Property Address: 508 Beaumont Road, Silver Spring, Maryland 20904  
Certificate No.: 802044  
Date of Issuance: December 18, 2017

Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017



Property Address: 1178 Cleveland Street, Baltimore, Maryland 21230  
Certificate No.: 807748  
Date of Issuance: March 9, 2018

Property Address: 3309 Lake Avenue, Baltimore, Maryland 21213  
Certificate No.: 770433  
Date of Issuance: January 16, 2017

Property Address: 1511 Kenhill Avenue, Baltimore, Maryland 21213  
Certificate No.: 829095  
Date of Issuance: March 7, 2018

Property Address: 2812 Oswego Avenue, Baltimore, Maryland 21215  
Certificate No.: 821296  
Date of Issuance: August 11, 2017

Property Address: 8615 Chestnut Oak Road, Baltimore, Maryland 21234  
Certificate No.: 804216  
Date of Issuance: November 10, 2017

Property Address: 1002 S. Belnord Avenue, Baltimore, Maryland 21224  
Certificate No.: 804260  
Date of Issuance: December 28, 2017

Property Address: 50 Mavista Avenue, Baltimore, Maryland 21222  
Certificate No.: 813354  
Date of Issuance: August 23, 2017

Property Address: 3908 S. Hanover Street, Baltimore, Maryland 21225  
Certificate No.: 813356  
Date of Issuance: August 24, 2017

Property Address: 1123 North Mount Street, Baltimore, Maryland 21217  
Certificate No.: 746832  
Date of Issuance: June 23, 2016

Property Address: 3527 Reisterstown Road, Baltimore, Maryland 21215  
Certificate No.: 807756  
Date of Issuance: December 27, 2017

Property Address: 3337 Gwynn Falls Pkwy., Baltimore, Maryland 21216  
Certificate No.: 779686  
Date of Issuance: December 20, 2016

Property Address: 6771 Woodley Road, Baltimore, Maryland 21222  
Certificate No.: 813417  
Date of Issuance: August 29, 2017

Property Address: 397 Oriole Lane, Baltimore, Maryland 21224  
Certificate No.: 813370  
Date of Issuance: August 28, 2017

82. Sections 6-1005 and 6-422 of the Environment Article vest this Court with the authority to assess civil penalties against Home Free Lead Inspections, LLC up to \$25,000 per violation.

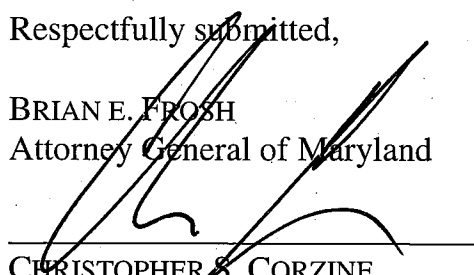
### **REQUEST FOR RELIEF**

WHEREFORE, the Department respectfully requests that this Court grant the following relief against Defendants:

- (a) Assess civil penalties against Defendants of up to \$25,000 per violation, pursuant to §§ 6-1005 and 6-422 of the Environment Article; and
- (b) Grant such other relief as this Court deems just and equitable.

Respectfully submitted,

BRIAN E. FROSH  
Attorney General of Maryland

  
CHRISTOPHER S. CORZINE  
CPF No.: 0212170178  
Assistant Attorney General  
Office of the Attorney General

Maryland Department of the  
Environment  
1800 Washington Boulevard,  
Suite 6048  
Baltimore, Maryland 21230  
(410) 537-3033  
(410) 537-3943 (facsimile)  
[Chris.corzine@maryland.gov](mailto:Chris.corzine@maryland.gov)