

**S/O THE CORPORATION TRUST
INCORPORATED (RESIDENT AGENT)**
351 West Camden Street
Baltimore, MD 21201-7912

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MARYLAND JOCKEY CLUB, INC.
5201 Park Heights Avenue
Pimlico Racecourse
Baltimore, Maryland 21215

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and

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MARTIN JACOBS
P.O. Box 130
Laurel, MD 20725

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and

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**S/O THE CORPORATION TRUST,
INCORPORATED (RESIDENT AGENT)**
2405 York Road, Ste. 201
Lutherville-Timonium, Maryland 21093-2264

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and

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**THE MARYLAND JOCKEY CLUB OF
BALTIMORE CITY, INC.**
Route 198 And Racetrack Road
Laurel, MD 20725

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PIMLICO RACING ASSOCIATION INC.,
5201 Park Heights Avenue
Baltimore, Maryland 21215

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and

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PIMLICO RACE COURSE
5201 Park Heights Avenue
Baltimore, Maryland 21215

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MARLYAND ECONOMIC
DEVELOPMENT CORPORATION,
Robert C. Brennan, Executive Director
and Resident Agent
300 E Lombard St Suite 1000
Baltimore, MD 21202

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Defendants.

**COMPLAINT FOR DECLARATORY, AND INJUNCTIVE RELIEF,
PETITION FOR CONDEMNATION, AND REQUEST FOR JURY TRIAL**

Plaintiffs, The Mayor and City Council of Baltimore (“the City”), Tony Bridges, Jimmy Mitchell, and Pamela Curtis, (together, “Plaintiffs”) by their attorneys, Andre M. Davis, Baltimore City Solicitor, Suzanne Sangree, and Aaron DeGraffenreidt, file this Complaint for Declaratory and Injunctive Relief and Petition for Condemnation pursuant to Md. Code, Cts. & Jud. Proc. § 3-401 *et seq.*, seeking, among other relief, a declaration from the Court that Defendants, The Stronach Group, the Maryland Jockey Club, Inc., The Maryland Jockey Club of Baltimore City, Inc., and Pimlico Racing Association, Inc. (“Racing Defendants”) cannot relocate the Preakness Stakes (“Preakness”) from its current venue at Pimlico Race Course located in Baltimore City, because there is no incipient or imminent disaster or emergency and thus Md. Code, Business Reg. § 11-520(b), prohibits the relocation of the Preakness Stakes from Pimlico to another venue. Racing Defendants are openly planning to violate Maryland law by moving the Preakness to a different racetrack despite the absence of any disaster or emergency, except for the disaster that they are in the process of creating. *Exhibit 1*. Additionally, the Plaintiffs seek a declaration that the Maryland Economic Development Corporation (“MEDCO”) may not issue bonds for the purpose of disinvesting from the Pimlico Race Course (“Pimlico”) and/or the Park Heights Urban Renewal zone in Baltimore City, an area of high unemployment, in order to foster economic development in Laurel and Bowie, areas of low unemployment, by moving the Preakness and its training

facilities to those locations. In addition, the City petitions this Court to acquire by condemnation the fee simple interest and title in the property located at 5201 Park Heights Avenue in Baltimore, more commonly known as the Pimlico Race Course. Finally, the City petitions this Court to acquire by condemnation the ownership of the Preakness Stakes, and all tangible and intangible property associated with the Preakness, including the Maryland Jockey Club, Inc. and The Maryland Jockey Club of Baltimore City, Inc.

JURISDICTION

1. This Court has jurisdiction over this action pursuant to Md. Code, Cts. & Jud. Proc. Art., §§ 3-403, 3-406, and 6-103(b)(3). The Court has personal jurisdiction over the Defendants because they either own property in Maryland, they are located in Maryland, or they have and continue to transact substantial business within the State.

VENUE

2. Venue is proper in the Circuit Court for Baltimore City, Maryland pursuant to Md. Code, Cts. & Jud. Proc. Art., § 6-201.

PARTIES

3. Plaintiff MAYOR AND CITY COUNCIL OF BALTIMORE (the "City") is a municipality and corporate entity existing under and pursuant to the laws of Maryland and is authorized to bring this action under its Charter, Art. I, sec. 1.

4. Plaintiffs TONY BRIDGES, JIMMY MITCHELL, and PAMELA CURTIN are citizens and taxpayers of Maryland and of Baltimore City, and each is an elected representative and/or a resident of, and/or a business owner within, the Parks Heights neighborhood in Baltimore that will be profoundly adversely affected by the wrongful and *ultra vires* acts and

omissions complained of herein by defendants acting in concert with each other and with others known and unknown.

5. Defendant THE STRONACH GROUP is an interrelated group of entertainment and real estate development business ventures working together to make The Stronach Group “the most dominant player in the Thoroughbred horse racing industry in the United States.” (Stronach Website: <http://www.stronachgroup.com/>). The Stronach Group conducts business in Maryland through its affiliated companies. It is a resident of Maryland. The Stronach Group owns or controls or is under common control with Defendants the MARYLAND JOCKEY CLUB, INC., THE MARYLAND JOCKEY CLUB OF BALTIMORE CITY, INC., and PIMLICO RACING ASSOCIATION, INC. One or more of these defendants, directly or through affiliates, own Defendant PIMLICO RACE COURSE and the Preakness.

6. Defendant THE STRONACH CONSULTING CORP. is an Ontario corporation whose principal office is in Aurora, Ontario, Canada. It is the registered owner of the Trade Name for Defendant The Stronach Group according to records filed with the Maryland State Department of Assessments and Taxation (SDAT). Defendant THE CORPORATION TRUST INCORPORATED is a Maryland resident and the listed Resident Agent for The Stronach Consulting Corp. according to SDAT records.

7. Defendant THE MARYLAND JOCKEY CLUB OF BALTIMORE CITY, INC. is the registered owner of the Pimlico Race Course property according to SDAT records. That record lists Defendant MARTIN JACOBS and his post office box as the mailing address. Additional SDAT filings list The Corporation Trust, Incorporated as the Registered Agent for The Maryland Jockey Club of Baltimore City, Inc.

8. MARYLAND JOCKEY CLUB, INC. has its principal office registered at the

Pimlico Race Course and The Corporation Trust, Incorporated is its listed Registered Agent.

9. Defendant MARYLAND ECONOMIC DEVELOPMENT CORPORATION (“MEDCO”), is a body politic and corporate and is an instrumentality of the State of Maryland. Its exercise of corporate powers is the performance of an essential governmental function. Md. Code, Economic Dev. § 10-105. Robert C. Brennan is MEDCO’s Executive Director and its Resident Agent. It is located at 300 E Lombard Street Suite 1000, Baltimore, MD 21202.

FACTUAL BACKGROUND

10. Since 1870, the Preakness has been run each Spring at the historic Pimlico Race Course, a Baltimore tradition for almost 150 years.*

11. The Maryland Stadium Authority concluded in its study published in February 2018 that the Preakness generates \$34.4 million in direct spending which substantially occurs near the host venue. The Authority concluded that the Preakness supports 620 jobs, in “many sectors of the economy, which both directly and indirectly support the increased level of business activity in the area.” Total earnings generated from the Preakness are “estimated to be \$24.2 million annually.” MSA Phase 2 Report, App. B Economic and Fiscal Impact Analysis (Feb. 2018)(available at <https://www.mdstad.com/studies/pimlico-race-course-study-phase-1-2>).

12. Pimlico and the Preakness, The Maryland Jockey Club of Baltimore City, Inc. and the Maryland Jockey Club, Inc. are each located in Baltimore City within the boundaries of the Park Heights Urban Renewal Plan Ordinance No. 08-93, approved December 11, 2008 and last amended November 9, 2018.

13. By state statute, the property of the Preakness includes: 1. “the Preakness Stakes trophy that is known as the Woodlawn Vase, including any and all property or property rights

* In 1890 the Preakness was run at Morris Park in New York due to financial problems.

associated with it, whether tangible, intangible, real, personal, or mixed, and any business entity that owns it;” Md. Code, Business Reg. § 11-521 (a)(4); 2. “the name, common law and statutory copyrights, service marks, trademarks, trade names, contracts, horse racing events, and other intangible and intellectual property that are associated with the Preakness Stakes and the Woodlawn Vase;” *id.* § 11-521 (a)(5); and 3. “all property of the Maryland Jockey Club of Baltimore City, Inc., or its successors and assigns, including stock and equity interest in it, and including any and all property or property rights associated with it, whether tangible, intangible, real, personal, or mixed. *Id.* § 11-521 (a)(6).

14. Racing Defendants have owned Pimlico and operated the Preakness since 2009.

15. Upon information and belief, since approximately 2011, Racing Defendants have systematically underinvested in Pimlico and invested instead in the Laurel Racetrack. Racing Defendants are reported to have spent nearly 80% of [Maryland state] government provided subsidies for facilities improvements at Laurel Racetrack, which has accelerated the deterioration of Pimlico. Donovan, *Baltimore Sun*, “Breaking down the \$23 million spent at Pimlico vs. the \$89 million spent at Laurel” (March 1, 2019).

16. Under Maryland law, the Preakness must remain located at Pimlico unless a “disaster or emergency” necessitates its transfer to another racetrack within the state. Md. Code, Business Reg. § 11-520.

17. No disaster or emergency requires transfer of the Preakness from Pimlico to Laurel, but systemic underinvestment in Pimlico, if allowed to continue and accelerate as the Racing Defendants have done, and as all Defendants plan to do, would endanger Pimlico’s ability to continue its historic role as the venue for the Preakness, and as major economic and jobs generator for the City and in particular, the Park Heights Urban Renewal zone.

18. Through the systemic divestment of Pimlico, Defendants could indeed manufacture an “emergency or disaster” to justify transfer of the Preakness to Laurel, as undermaintained infrastructure begins to fail and crowds attending Pimlico races and the horses racing there are endangered. The last major renovation at Pimlico was over 30 years ago in 1983. The Maryland Stadium Authority (MSA) “Situational Analysis” of Pimlico concluded in February of 2018 that “in order to meet code compliance, an additional 293 toilets would need to be installed,” doubling the number of toilets on site, and mechanical, plumbing, and electrical systems require upgrading to meet modern building codes. MSA Phase 2 Study at C. The MSA study recommends a major capital investment to renovate Pimlico. Instead, the Racing Defendants and MEDCO plan to accelerate the divestment of Pimlico, while they continue to hold the Preakness there until capital improvements at Laurel and Bowie are completed as projected in 2022.

19. Legislation poised to be enacted in the Maryland General Assembly would allocate 80% of Video Lottery Terminal Proceeds for capital improvements of racetracks, referred to as the Racetrack Facility Renewal Account funds or “RFRA funds,” to MEDCO for the purpose of issuing revenue bonds to generate up to \$120,000,000.00 for the Racing Defendants. Ltr. from Baltimore Senate Delegation to Sen. Nancy King, Chair of Senate Budget & Tax. Comm. (March 16, 2019) (referencing SB 883); *see* HB 990, Fiscal Note (the legislation is hereinafter referred to as the “MEDCO legislation”).

20. The MEDCO legislation would authorize MEDCO to enter agreements with the Racing Defendants to invest the bond funds in capital improvements at Laurel Park and on the grounds of the Bowie Race Course Training Center, but not at Pimlico. *Id.* The legislation requires the Racing Defendants, to pay “at least 50% of the total costs associated with the bonds or financing, including debt service and repayment of principal, interest, and fees.” HB 990, 9-1A-

29.1 (C)(1) lines 29-30. In addition, the MEDCO legislation obligates the State Comptroller to pay up to 80% of state proceeds from Video Lottery Terminals to pay the bond debt. *Id.*

21. Simultaneously, the MEDCO legislation prohibits the reduction of the amount of RFRA funds available to Rosecroft Raceway and Ocean Downs Race Course. *Id.*

22. Predictably, the impact of the MEDCO legislation will be to dramatically reduce the RFRA funds and Racing Defendants' funds available to Pimlico for capital improvements.

**FIRST CAUSE OF ACTION
DECLARATORY JUDGMENT THAT NO DISASTER
OR EMERGENCY EXISTS TO JUSTIFY TRANSFERRING
PREAKNESS TO LAUREL RACE TRACK**

23. Plaintiff Mayor and City Council of Baltimore realleges each and every allegation contained above, as though set forth herein in full.

24. Racing Defendants are openly planning to violate current Maryland law by moving the Preakness to Laurel Racetrack despite the absence of any disaster or emergency.

25. **WHEREFORE**, the City respectfully requests that this Honorable Court determine and adjudicate the rights of the parties and enter judgment declaring that no disaster or emergency exists to justify transferring the Preakness to Laurel Racetrack..

**SECOND CAUSE OF ACTION
INJUNCTIVE RELIEF**

26. Plaintiff Mayor and City Council of Baltimore realleges each and every allegation contained above, as though set forth herein in full.

27. **WHEREFORE**, this Court should enter an injunction prohibiting the Racing Defendants from pursuing a course of action to relocate the Preakness, and all of the associated properties of every type including the Woodlawn Vase and all tangible, intangible, and intellectual property, from its current location at Pimlico, because there is no disaster or emergency present. Md. Code, Business Reg. § 11-520(b).

**THIRD CAUSE OF ACTION
DECLARATORY JUDGMENT REGARDING ULTRA VIRES ACTS OF MEDCO**

28. Plaintiffs reallege each and every allegation contained above, as though set forth herein in full.

29. MEDCO's enabling legislation defines its purposes, among others, as: 1. relieving unemployment in the State, 2. encouraging business activity so that the State's economy is "balanced", and 3. promoting "the health, safety, right of gainful employment, and welfare of residents of the State." Md. Code, Economic Development § 10-104(b).

30. The Baltimore City median household income in 2016 was \$47,350, and its unemployment rate was 7.2%. Sixty-two percent of its population is African-American, and 27.5% is classified by U.S. Census authorities as "white alone." <http://www.city-data.com/city/Baltimore-Maryland.html>

31. The neighborhood of Southern Park Heights, which is located within the Park Heights URO and which borders Pimlico Racetrack, had a median household income of only \$26,320 in 2016. It has a population that is 94% African-American, and 2.2% white alone, and its unemployment rate in 2016 was 23%.

<https://bniajfi.org/community/Southern%20Park%20Heights/>

32. The neighborhood of Pimlico/Arlington/Hilltop, which is also located in the Park Heights URO and which borders the Pimlico Racetrack, had a median income of \$30,611. Its population is 95% African-American and only 2.3% white alone. Its unemployment rate in 2016 was 17.3%.

https://bniajfi.org/community/Pimlico_Arlington_Hilltop/

33. Laurel's median income in 2016 was \$71,236. Its population is slightly less than 50% African-American and 22% white alone. Laurel's rate of unemployment in 2016 was 4.8%.

<http://www.city-data.com/city/Laurel-Maryland.html>

34. Bowie's median income in 2016 was \$110,652. Its population in 2016 was also slightly less than 50% African American, and 33% white alone. Its unemployment rate was 4.1%

in 2016. <http://www.city-data.com/city/Bowie-Maryland.html>

35. Disinvesting from Pimlico in order to invest in Laurel and Bowie creates further imbalances in Maryland's economy, taking jobs away from an area suffering much greater unemployment in order to create more jobs in areas of low unemployment. Similarly, it takes investment away from northwest Baltimore, an area of relative poverty and low economic activity, to stimulate the much wealthier economies of Laurel and Bowie.

36. **WHEREFORE**, Plaintiffs respectfully request that this Honorable Court determine and adjudicate the rights of the parties and enter judgment declaring that, it would be contrary to MEDCO's legislative purpose to issue revenue bonds to systematically disinvest from Pimlico Race Course and to augment investment in Laurel and Bowie.

**FOURTH CAUSE OF ACTION
VIOLATION OF MARYLAND CONSTITUTIONAL DEBT RESTRICTIONS**

37. Plaintiffs reallege each and every allegation contained above, as though set forth herein in full.

38. The MEDCO legislation promises that state funds from the Racetrack Facility Renewal Account will be used to service a portion of the debt for the Bowie Race Course Training Center and/or Laurel Park bonds in violation of the Debt Restrictions provision of the Maryland Constitution. Md. Const. Art. III § 34.

39. The MEDCO legislation mandates that a stream of future State revenues (up to 80% of RFRA funds) be used for so long as required to pay the racetrack bonds. It provides that the Comptroller “shall pay” up to 80% of those funds to MEDCO “in an amount determined by [MEDCO] according to the debt service schedule.” H.B. 990, Sec. 9-1A-29.1(D)(1). And it provides that “payments required [to cover the state’s portion of the debt] shall continue in duration and in the amounts required by [MEDCO], in accordance with the terms of the bond or financing agreements.” Id. § (D)(2). In other words, the MEDCO legislation envisions a division of financing payments between The Stronach Group and MEDCO – a hybrid of private and public financing that includes a promise of state financing for a portion of the bonds.

40. The inclusion of the State obligation (“the Comptroller shall pay”) to pay up to 80% of State RFRA funds to finance the bond violates the Debt Restrictions provision of the Maryland Constitution, which provides in relevant part: “The credit of the State shall not in any manner be given, or loaned to, or in aid of any individual association or corporation.” Md. Const. art. III, § 34. See *Maryland Indus. Dev. Fin. Auth. v. Helfrich*, 250 Md. 602, 621 (1968) (“It was the pledge of the State’s credit to support the Authority’s guaranty of loans . . . to be made in aid of private industry . . . which was fatal.”).

41. **WHEREFORE**, Plaintiffs urge this Court to declare the MEDCO legislation unconstitutional and to enjoin it from becoming effective.

**FIFTH CAUSE OF ACTION
CONDEMNATION OF PIMLICO RACE TRACK**

42. Plaintiff Mayor and City Council of Baltimore realleges each and every allegation contained above, as though set forth herein in full.

43. The City is duly authorized to acquire the Property Interest hereinafter described for public purposes by Art. II § 2 of the Charter for Baltimore City and the following Ordinances

of the Mayor and City Council of Baltimore, viz: Article 13, § 2-7 of the Baltimore City Code (2000 Edition) as amended; and the Park Heights Urban Renewal Plan Ordinance No. 08-93, approved December 11, 2008 and last amended November 9, 2018 (the “Park Heights URO”).

44. It is necessary for the City to acquire the Fee Simple interest in and to the property known as 5201 Park Heights Avenue in Baltimore City, State of Maryland (hereinafter called “the Property”), Ward 27, Section 19, Block 4556, Lot 001 and more particularly shown in the Exhibit 2 attached hereto, together with improvements thereupon, and all the rights, ways, waters, easements, privileges, advantages and appurtenances thereto belonging or in anywise appertaining.

45. This property will be used to foster economic development and for redevelopment purposes as described in the Park Heights URO.

46. Petitioner and its duly authorized municipal officers are unable to agree with the Defendants upon a price to be paid for said property interest, and therefore Petitioner seeks to acquire the same by condemnation.

47. **WHEREFORE**, this proceeding is brought and the City prays that this Honorable Court will have said property, with all improvements thereon, and all rights and appurtenances in anywise appertaining thereto as aforesaid and every interest therein, condemned as to said Leasehold interest, for the uses and purposes of the Mayor and City Council of Baltimore in accordance with the requirement of the law in such cases made and provided, the provisions of Title 12 of the Real Property Article of the Maryland Annotated Code (Edition 2015) and all amendments thereto.

**SIXTH CAUSE OF ACTION
CONDEMNATION OF PREAKNESS STAKES**

48. Plaintiff Mayor and City Council of Baltimore realleges each and every allegation contained above, as though set forth herein in full.

49. The City is duly authorized to acquire the Property Interest hereinafter described for public purposes by Art. II § 2 of the Charter for Baltimore City and the following Ordinances of the Mayor and City Council of Baltimore, viz: Article 13, § 2-7 of the Baltimore City Code (2000 Edition) as amended; and the Park Heights Urban Renewal Plan Ordinance No. 08-93, approved December 11, 2008 and last amended November 9, 2018.

50. It is necessary for the City to acquire full ownership of the property known as 1. “the Preakness Stakes trophy that is known as the Woodlawn Vase, including any and all property or property rights associated with it, whether tangible, intangible, real, personal, or mixed, and any business entity that owns it;” Md. Code, Business Reg. § 11-521 (a)(4); 2. “the name, common law and statutory copyrights, service marks, trademarks, trade names, contracts, horse racing events, and other intangible and intellectual property that are associated with the Preakness Stakes and the Woodlawn Vase;” *id.* § 11-521 (a)(5); and 3. “all property of the Maryland Jockey Club of Baltimore City, Inc., or its successors and assigns, including stock and equity interest in it, and including any and all property or property rights associated with it, whether tangible, intangible, real, personal, or mixed. *Id.* § 11-521 (a)(6).

51. These properties will be used to continue their historic role in the cultural traditions of Baltimore City, to foster employment and economic development in Baltimore, and in particular in the Park Heights Urban Renewal jurisdiction, as well as to protect the health and safety of the people attending the Preakness and other Pimlico events, as well as the employees and horses working there.

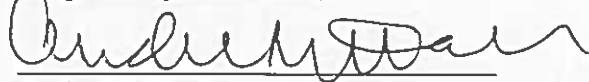
52. The City and its duly authorized municipal officers are unable to agree with the Racing Defendants upon a price to be paid for said property interest, and therefore the City seeks to acquire the same by condemnation.

53. **WHEREFORE**, this proceeding is brought, and the City prays that this Honorable Court will have said property, with all rights and appurtenances, whether tangible or intangible, real, personal, or mixed, and any business entity that owns it as aforesaid and every interest therein, condemned as to said property interests, for the uses and purposes of the Mayor and City Council of Baltimore.

REQUEST FOR JURY TRIAL

Plaintiffs hereby demand a jury trial on all causes of action for which a jury is available under the law.

Respectfully Submitted,



Andre M. Davis
City Solicitor

Suzanne Sangree
Senior Counsel for Public Safety and
Director of Affirmative Litigation

Aaron B. DeGraffenreidt
Assistant City Solicitor

BALTIMORE CITY DEPARTMENT
OF LAW
City Hall
100 N. Holliday Street
Baltimore, Maryland 21202
Telephone: 443-388-2190
or 410-396-5784

Attorneys for Plaintiffs



STRONACH
G R O U P

February 8, 2019

Honorable Lawrence J. Hogan, Jr.
Governor, State of Maryland
State House Annapolis, Maryland 21401

Honorable Thomas V. Mike Miller, Jr.
President, Maryland Senate
State House Annapolis, Maryland 21401

Honorable Michael E. Busch
Speaker, Maryland House of Delegates
State House Annapolis, Maryland 21401

Dear Governor Hogan, President Miller and Speaker Busch,

The Stonach Group (TSG) is a collection of world-class technology, entertainment, and real estate development companies with thoroughbred horse racing and pari-mutuel wagering at its core. TSG's Racing & Gaming business owns and operates racetrack properties and training centers across the United States including the Maryland Jockey Club, the operator of Pimlico Race Course, Laurel Park, Bowie Training Center, and Rosecroft Raceway in Maryland. TSG has charted a course that has resulted in the growth of the Maryland racing industry through an increase in the number of live race dates, improved field size and race quality, and growth of handle and inventory of thoroughbred horses. Our company is committed to the modernization of the thoroughbred racing industry in Maryland by engaging a new generation of fans through the implementation of technology and innovative events, and creating a better overall experience for both guests and horsemen.

The Maryland Jockey Club and Maryland thoroughbred racing are core components of TSG's business today and are an essential part of our future plans. It is our goal for Maryland racing to regain a permanent place among the top tier of thoroughbred racing states, including Kentucky, New York, Florida, and California, while also being a strong economic engine for the state. This outcome is very possible, if not probable, but the right steps need to be taken now in order to secure the industry's future in Maryland.



The future of Maryland racing requires a discussion of topics much broader than a single race or a single racing facility. We appreciate the work of the Maryland Stadium Authority (MSA) with two studies conducted over the last three years related to the Pimlico Race Course. MSA's work confirmed two things. First, the Pimlico facility has reached the end of its useful life as a major event venue. Second, the cost associated with a brand-new racing facility is extraordinary – at least \$424 million for the racing related structures alone. To date, we are not aware of any proposal to publicly fund an investment of this magnitude for two days of racing that offer no clear benefit for the remaining 363 days. There is also legitimate concern that moving forward with such a project does not consider what is best for the long-term future of the racing industry.

We have been engaged in discussions with our industry partners, the Maryland Thoroughbred Horsemen's Association (MTHA) and the Maryland Horse Breeders Association (MHBA). With the intention to strengthen Maryland racing and its associated equine and agricultural industries, those discussions have focused on:

- Maintaining a competitive purse structure
- Incentivizing Maryland breeding
- Continuing to grow live racing days in pursuit of year-round racing
- First class training and equine health facilities, provided that there is more than one training location
- Large race fields and quality racing generating a strong simulcast signal
- Improving cost efficiency in racing operations
- Developing a modern, state of the art, destination racing venue for a new generation of racing participants and fans
- Making Maryland racing the epicenter of thoroughbred racing in the mid-Atlantic region, and a national and international model for a new generation of participants and fans

By working together and with the assistance of the state's existing funding programs for purses and racetrack capital improvements, we are making gains in many of these areas.

The most viable plan for Maryland's racing's future involves: (1) a single "super track" serving as the premier venue for major racing events; and (2) a new training and equine health center. Operating under the very reasonable assumption that a public investment of more than \$400 million in a completely new Pimlico is unlikely, it is clear that a super track at Laurel Park and an affiliated training track at Bowie are the best and most logical options.



The proposed Laurel and Bowie construction projects fit within the General Assembly's plan for racetrack capital improvements originally set out in 2007. This approach meets the state's existing funding parameters and does not seek additional state or local financial support. At a total estimated project cost of \$120 million, existing state RFRA funds combined with TSG's commitment to spend \$60 million in matching funds are sufficient to bring Maryland's racing facilities to a modern and first-class level.

Ultimately, a newly renovated Laurel Park is in the best interest of racing and the State of Maryland as a whole. We seek your support for two pieces of legislation in the 2019 Session – (1) a bill authorizing Bowie Training Center to be eligible for existing RFRA funds; and (2) a bill authorizing a portion of existing RFRA funds to be dedicated to MEDCO for the purpose of issuing bonds to finance capital improvements at Laurel Park and the Bowie Training Center. Funding for projects at Laurel Park and/or Bowie may only proceed with approval from the Maryland Racing Commission.

The State of Maryland, City of Baltimore, and local communities have been our hosts and partners for many years, and we want to make it very clear that no matter the outcome of this legislative session and the budget decisions made within, TSG is and will remain steadfastly committed to the communities surrounding Pimlico, Baltimore City, and the entire State of Maryland.

We recognize that the future of the thoroughbred industry as a whole relies on your support and assistance. Together, we can preserve the Preakness Stakes in Maryland, improve the racing industry, realize sustainable year-round horse racing and training, and enhance guest experience and greater fan engagement in Maryland.

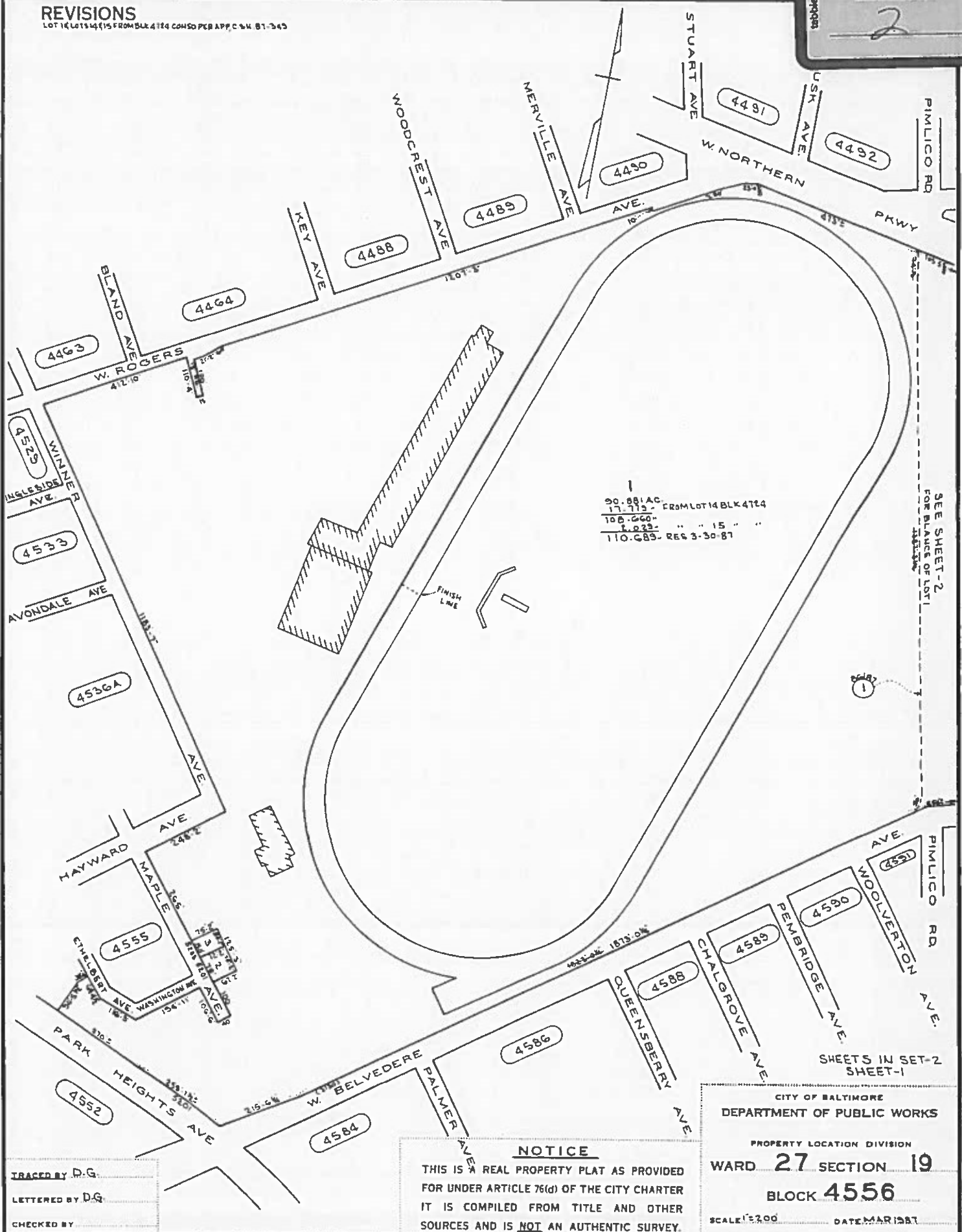
Sincerely,

Tim Ritvo
Chief Operating Officer

Cc: Senator Nancy King, Chair, Senate Budget & Taxation Committee
Delegate Anne Kaiser, Chair, House Ways & Means Committee
Delegate Maggie McIntosh, Chair, House Appropriations Committee
Hon. Catherine Pugh, Mayor City of Baltimore
Hon. Steuart Pittman, County Executive Anne Arundel County
Hon. Angela Alsobrooks, County Executive Prince George's County
Hon. Michael Algeo, Chairman Maryland Racing Commission

REVISIONS

LOT 16 LOTS 14(1)5 FROM BLK 4784 CONS PER APP. C. 64. 81-349



1
90.88 AC.
17.715 FROM LOT 14 BLK 4784
108.660-
1.825 " " 15 " "
110.685. REG 3-30-87

SEE SHEET - 2
FOR BALANCE OF LOT 1

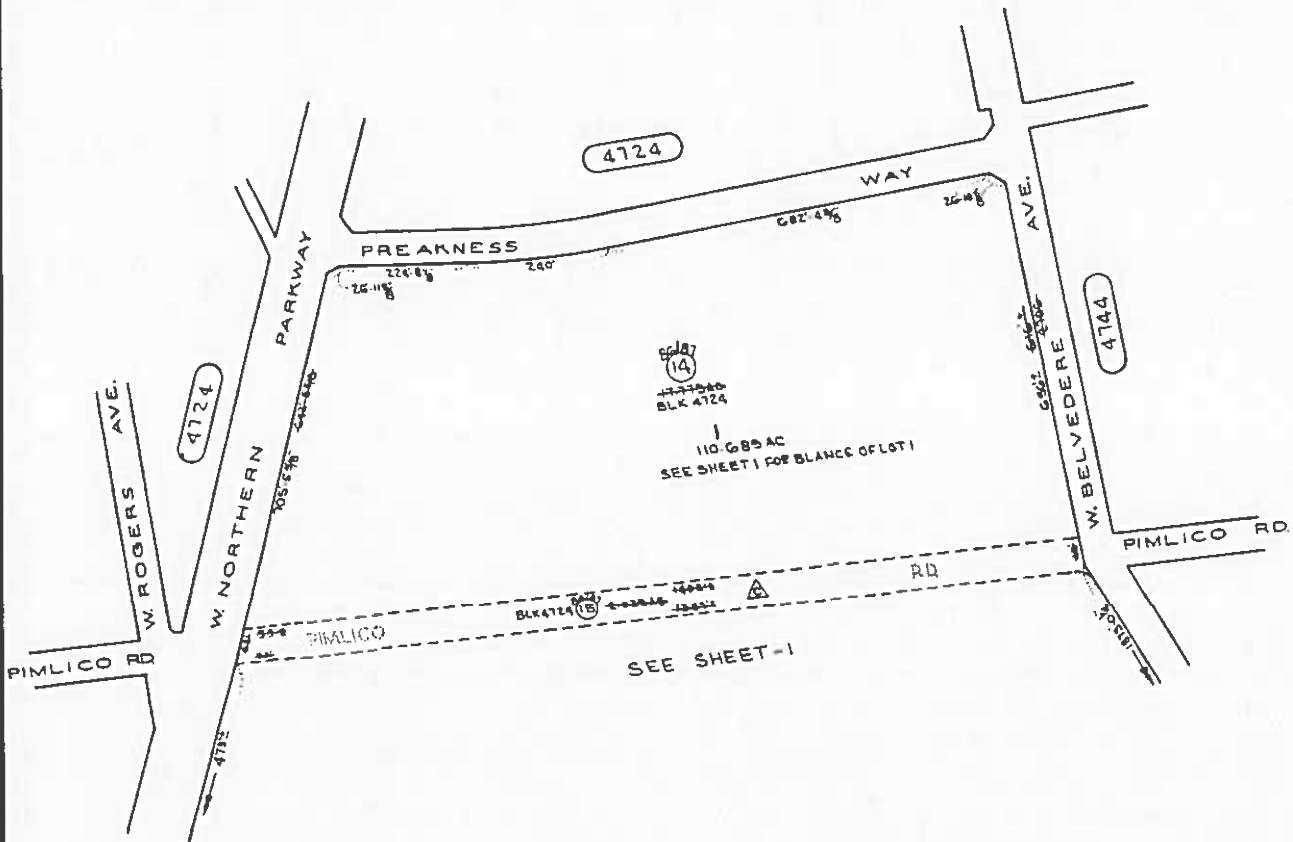
SHEETS IN SET-2
SHEET-1

CITY OF BALTIMORE
DEPARTMENT OF PUBLIC WORKS
PROPERTY LOCATION DIVISION
WARD 27 SECTION 19
BLOCK 4556
SCALE: 1"=200' DATE: MAR 1987

NOTICE
THIS IS A REAL PROPERTY PLAT AS PROVIDED
FOR UNDER ARTICLE 76(d) OF THE CITY CHARTER
IT IS COMPILED FROM TITLE AND OTHER
SOURCES AND IS NOT AN AUTHENTIC SURVEY.

TRACED BY D.G.
LETTERED BY D.G.
CHECKED BY

REVISIONS



SHEETS IN SET-2
SHEET-2

CITY OF BALTIMORE
DEPARTMENT OF PUBLIC WORKS

PROPERTY LOCATION DIVISION

WARD 27 SECTION 19

BLOCK 4556

SCALE 1"=200'

DATE MAR 1967

NOTICE

THIS IS A REAL PROPERTY PLAT AS PROVIDED FOR UNDER ARTICLE 76(d) OF THE CITY CHARTER IT IS COMPILED FROM TITLE AND OTHER SOURCES AND IS NOT AN AUTHENTIC SURVEY.

TRACED BY D.G.

LETTERED BY D.G.

CHECKED BY



CIVIL - NON-DOMESTIC CASE INFORMATION REPORT

DIRECTIONS

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: PLAINTIFF DEFENDANT CASE NUMBER _____

CASE NAME: Mayor & City Council of Baltimore, et al vs. The Stronach Consulting Group, et al.
Plaintiff (Clerk to insert) Defendant

PARTY'S NAME: Mayor & City Council of Baltimore City PHONE: _____

PARTY'S ADDRESS: 100 N. Holliday Street, City Hall, Room 143

PARTY'S E-MAIL: suzanne.sangree@baltimorecity.gov

If represented by an attorney:
 PARTY'S ATTORNEY'S NAME: Suzanne Sangree PHONE: 443-388-2190
 PARTY'S ATTORNEY'S ADDRESS: 100 N. Holliday Street, Suite 101, Baltimore, Maryland 21202
 PARTY'S ATTORNEY'S E-MAIL: suzanne.sangree@baltimorecity.gov

JURY DEMAND? Yes No

RELATED CASE PENDING? Yes No If yes, Case #(s), if known: _____

ANTICIPATED LENGTH OF TRIAL?: _____ hours _____ days

PLEADING TYPE

New Case: Original Administrative Appeal Appeal
 Existing Case: Post-Judgment Amendment
If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

<p>TORTS</p> <p><input type="checkbox"/> Asbestos <input type="checkbox"/> Assault and Battery <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Conspiracy <input type="checkbox"/> Conversion <input type="checkbox"/> Defamation <input type="checkbox"/> False Arrest/Imprisonment <input type="checkbox"/> Fraud <input type="checkbox"/> Lead Paint - DOB of Youngest Plt: _____ <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Malpractice-Medical <input type="checkbox"/> Malpractice-Professional <input type="checkbox"/> Misrepresentation <input type="checkbox"/> Motor Tort <input type="checkbox"/> Negligence <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Specific Performance <input type="checkbox"/> Toxic Tort <input type="checkbox"/> Trespass <input type="checkbox"/> Wrongful Death</p> <p>CONTRACT</p> <p><input type="checkbox"/> Asbestos <input type="checkbox"/> Breach <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Confessed Judgment (Cont'd) <input type="checkbox"/> Construction <input type="checkbox"/> Debt <input type="checkbox"/> Fraud</p>	<p><input type="checkbox"/> Government <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability</p> <p>PROPERTY</p> <p><input type="checkbox"/> Adverse Possession <input type="checkbox"/> Breach of Lease <input type="checkbox"/> Detinue <input type="checkbox"/> Distress/Distrain <input type="checkbox"/> Ejectment <input type="checkbox"/> Forcible Entry/Detainer <input type="checkbox"/> Foreclosure <input type="checkbox"/> Commercial <input type="checkbox"/> Residential <input type="checkbox"/> Currency or Vehicle <input type="checkbox"/> Deed of Trust <input type="checkbox"/> Land Installments <input type="checkbox"/> Lien <input type="checkbox"/> Mortgage <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Statement Condo <input type="checkbox"/> Forfeiture of Property / Personal Item <input type="checkbox"/> Fraudulent Conveyance <input type="checkbox"/> Landlord-Tenant <input type="checkbox"/> Lis Pendens <input type="checkbox"/> Mechanic's Lien <input type="checkbox"/> Ownership <input type="checkbox"/> Partition/Sale in Lieu <input type="checkbox"/> Quiet Title <input type="checkbox"/> Rent Escrow <input type="checkbox"/> Return of Seized Property <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Tenant Holding Over</p>	<p>PUBLIC LAW</p> <p><input type="checkbox"/> Attorney Grievance <input type="checkbox"/> Bond Forfeiture Remission <input type="checkbox"/> Civil Rights <input type="checkbox"/> County/Mnepl Code/Ord <input type="checkbox"/> Election Law <input checked="" type="checkbox"/> Eminent Domain/Condemn. <input type="checkbox"/> Environment <input type="checkbox"/> Error Coram Nobis <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Mandamus <input type="checkbox"/> Prisoner Rights <input type="checkbox"/> Public Info. Act Records <input type="checkbox"/> Quarantine/Isolation <input type="checkbox"/> Writ of Certiorari</p> <p>EMPLOYMENT</p> <p><input type="checkbox"/> ADA <input type="checkbox"/> Conspiracy <input type="checkbox"/> EEO/HR <input type="checkbox"/> FLSA <input type="checkbox"/> FMLA <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Wrongful Termination</p> <p>INDEPENDENT PROCEEDINGS</p> <p><input type="checkbox"/> Assumption of Jurisdiction <input type="checkbox"/> Authorized Sale <input type="checkbox"/> Attorney Appointment <input type="checkbox"/> Body Attachment Issuance <input type="checkbox"/> Commission Issuance</p>	<p><input type="checkbox"/> Constructive Trust <input type="checkbox"/> Contempt <input type="checkbox"/> Deposition Notice <input type="checkbox"/> Dist Ct Mtn Appeal <input type="checkbox"/> Financial <input type="checkbox"/> Grand Jury/Petit Jury <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Perpetuate Testimony/Evidence <input type="checkbox"/> Prod. of Documents Req. <input type="checkbox"/> Receivership <input type="checkbox"/> Sentence Transfer <input type="checkbox"/> Set Aside Deed <input type="checkbox"/> Special Adm. - Atty <input type="checkbox"/> Subpoena Issue/Quash <input type="checkbox"/> Trust Established <input type="checkbox"/> Trustee Substitution/Removal <input type="checkbox"/> Witness Appearance-Compel</p> <p>PEACE ORDER</p> <p><input type="checkbox"/> Peace Order</p> <p>EQUITY</p> <p><input checked="" type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Equitable Relief <input checked="" type="checkbox"/> Injunctive Relief <input type="checkbox"/> Mandamus</p> <p>OTHER</p> <p><input type="checkbox"/> Accounting <input type="checkbox"/> Friendly Suit <input type="checkbox"/> Grantor in Possession <input type="checkbox"/> Maryland Insurance Administration <input checked="" type="checkbox"/> Miscellaneous <input type="checkbox"/> Specific Transaction <input type="checkbox"/> Structured Settlements</p>
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IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)

- | | | | |
|--|--|--|---|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Summary | <input type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Foreclosure | <input checked="" type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Attachment b/f Judgment | <input checked="" type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Cease & Desist Order | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Condemn Bldg | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Confessed | <input checked="" type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input type="checkbox"/> Damages-Compensatory | <input checked="" type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |
| <input type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment | |

If you indicated *Liability* above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

- Liability is conceded. Liability is not conceded, but is not seriously in dispute. Liability is seriously in dispute.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- Under \$10,000 \$10,000 - \$30,000 \$30,000 - \$100,000 Over \$100,000
- Medical Bills \$ _____ Wage Loss \$ _____ Property Damages \$ _____

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

- Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)
- | | | | | | |
|----------------|------------------------------|--|--------------------------|------------------------------|--|
| A. Mediation | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | C. Settlement Conference | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| B. Arbitration | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | D. Neutral Evaluation | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

SPECIAL REQUIREMENTS

- If a Spoken Language Interpreter is needed, check here and attach form CC-DC-041
- If you require an accommodation for a disability under the Americans with Disabilities Act, check here and attach form CC-DC-049

ESTIMATED LENGTH OF TRIAL

With the exception of Baltimore County and Baltimore City, please fill in the estimated LENGTH OF TRIAL.

(Case will be tracked accordingly)

- | | |
|---|--|
| <input type="checkbox"/> 1/2 day of trial or less | <input type="checkbox"/> 3 days of trial time |
| <input type="checkbox"/> 1 day of trial time | <input checked="" type="checkbox"/> More than 3 days of trial time |
| <input type="checkbox"/> 2 days of trial time | |

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- | | |
|---|--|
| <input type="checkbox"/> Expedited- Trial within 7 months of Defendant's response | <input type="checkbox"/> Standard - Trial within 18 months of Defendant's response |
|---|--|

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE
MANAGEMENT PROGRAM (ASTAR)**

FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.

- Expedited - Trial within 7 months of Defendant's response Standard - Trial within 18 months of Defendant's response

IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY, PLEASE FILL OUT THE APPROPRIATE BOX BELOW.

CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)

- Expedited Trial 60 to 120 days from notice. Non-jury matters.
- Civil-Short Trial 210 days from first answer.
- Civil-Standard Trial 360 days from first answer.
- Custom Scheduling order entered by individual judge.
- Asbestos Special scheduling order.
- Lead Paint Fill in: Birth Date of youngest plaintiff _____.
- Tax Sale Foreclosures Special scheduling order.
- Mortgage Foreclosures No scheduling order.


CIRCUIT COURT FOR BALTIMORE COUNTY

- Expedited (Trial Date-90 days) Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus.
- Standard (Trial Date-240 days) Condemnation, Confessed Judgments (Vacated), Contract, Employment Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other Personal Injury, Workers' Compensation Cases.
- Extended Standard (Trial Date-345 days) Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and out-of-state witnesses (parties), and trial of five or more days), State Insolvency.
- Complex (Trial Date-450 days) Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.

3-19-2019
Date

100 N. Holliday Street, City Hall, Room 143
Address

Baltimore MD 21202
City State Zip Code


Signature of Counsel / Party

Aaron DeGraff
Printed Name