

while standing perfectly still at about 10:30 a.m., on June 11, 1912, on West Lexington street, between Eutaw and Howard streets, was run into and seriously defaced and damaged by a street sprinkling cart. This occurrence was reported to the police officer stationed at the intersection of Liberty and Lexington streets, by my chauffeur and I understand a report of the occurrence has been made by this officer.

Upon my being informed of this accident I looked up the watering cart which caused my damage and find that it is operated under Baltimore City vehicle license #23146. I inquired of Messrs. Minch & Eisenbrey of West Lexington st., and ascertained from them that they together with a number of other merchants in the neighborhood of Howard and Lexington streets employ this watering cart, the owner or which is C.C. Lloyd, whose address is given as Old York Road, Waverly, Baltimore City.

After securing this information from Messrs. Minch & Eisenbrey, I looked around the neighborhood for the watering cart and found it on Park avenue between Lexington and Fayette sts., the cart then being in process of re-filling from a fire hydrant at the corner of Park avenue and Marion street. The colored man in charge of this watering wagon was seated on the hydrant cover while the water was flowing into the cart. I watched him for several minutes and his condition either through drunkenness or some physical disability was such that he could hardly sit on the cover of the hydrant.

A few minutes later I waited until this wagon was driven past the corner of Liberty and Lexington streets when I spoke to the police officer on duty there, calling his attention to the action of the driver of this wagon and asking the policeman if in his opinion the man were drunk or weak minded. The officer did not express an opinion. My chauffeur advised me, and it has been my own personal observation, that the driver of this wagon is famous for his disregard of the rights of either pedestrians or vehicles on the streets which his sprinkling cart covers. My automobile to my certain knowledge on more than one occasion, has been standing properly against the sidewalk when this wagon was driven by and the water squirted all over the automobile. The same disregard of the rights of pedestrians is shown by the fact that this man pays no attention to the foot crossings at the intersections of streets. The latter fact is proven by the fact of my having purposely stood close to his wagon when he passed the corner of Liberty & Lexington streets yesterday afternoon and know that he saw me, and had to step back to avoid being thoroughly wet, he having failed entirely to shut off his sprinkler. Aside from the damage which this man's carelessness or incompetency has caused me, resulting from the collision of his wagon with my automobile yesterday, I believe a little investigation of this man's general actions will convince you that the proper safety of vehicles and pedestrians in the neighborhood where this man's work requires him to be would necessitate his employers being compelled to replace him by someone of more competence and common sense.

In addition to having run into my automobile yesterday, another car directly opposite my own was run unto by the same wagon only about five minutes before my car was hit, and in my conversation with the policeman at Liberty and Lexington streets yesterday afternoon the officer told me that he understood this same man had run his wagon only a few minutes before into a horse or some other vehicle on Lexington street near Charles.

I submit the foregoing to you for what it may appear to you to be worth, and beg to remain.

Very truly yours,
W. W. BALDWIN."
