

NOTICE OF INTENT TO FILE PETITION FOR WRIT OF MANDAMUS

TO: Krysia Kubiak, City Solicitor, City of Pittsburgh

CC: Kimberly Clark-Baskin, City Clerk; R. Daniel Lavelle, Council President

VIA EMAIL: krysia.kubiak@pittsburghpa.gov / city.law@pittsburghpa.gov

DATE: February 9, 2026

COUNSEL:

Please be advised that I am formally putting the City of Pittsburgh on notice of my intent to file a Petition for a Writ of Mandamus in the Allegheny County Court of Common Pleas should the City fail to perform its mandatory, ministerial duties under the Pittsburgh Home Rule Charter.

On this day, February 9, 2026, I have hand-delivered to the City Clerk a valid petition containing 33 original signatures from residents and qualified electors of the City of Pittsburgh. This petition demands a Public Hearing and Oversight Inquiry into documented Records Tampering (18 Pa. C.S. § 4911) and Financial Misconduct at the Pittsburgh Municipal Court records section (660 First Avenue).

THE MANDATORY DUTY:

Pursuant to [Section 321 of the Pittsburgh Home Rule Charter](#), the City Council **SHALL** schedule a public hearing upon the filing of a petition signed by at least twenty-five (25) residents. This is a ministerial duty that leaves the Council and the Clerk with no discretion.

Furthermore, I have reported a defalcation of municipal funds—specifically a prohibited cash transaction at 660 First Avenue used to facilitate Information Sabotage—to the City Controller. Failure to audit these un-logged funds constitutes a breach of the mandatory fiduciary duties outlined in the Charter.

NOTICE:

If the City Clerk fails to certify the validity of this 33-signature petition, or if the Council President fails to schedule the requested hearing within the timeframe provided by law, I will seek a Judicial Command compelling the City to act. I possess the physical evidence (the "Ghost Report") of the fraud that your officers have attempted to "vanish" from the digital record.

The mandate has been met, Counsel. I suggest you advise your clients to comply with the Charter before the Court compels them to do so.

Sincerely,

Richard T. Mardoian

2026 FEB 09 15:58:00
CITY OF PITTSBURGH

AFFIDAVIT OF PETITION CIRCULATOR

I, Richard T. Mardoian, being duly sworn according to law, depose and say:

1. I am the circulator of the attached **Petition Requesting Public Hearing and Oversight Inquiry** regarding records tampering and municipal fraud at 660 First Avenue.
2. I personally circulated the aforementioned petition and witnessed each of the **33 signatures** appended thereto.
3. To the best of my knowledge and belief, each signer is a resident and qualified elector of the **City of Pittsburgh**, and each signed with full knowledge of the petition's contents.
4. Each signature was affixed on the date indicated, and the residence address for each signer is correctly stated.
5. I make this statement under penalty of **18 Pa. C.S. § 4904**, relating to unsworn falsification to authorities.

Signature of Circulator: Richard T. Mardoian

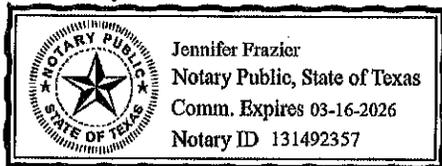
State: Texas

County: Dallas

Sworn to and subscribed before me this 08 day of February, 2026, by RICHARD MARDOIAN.

JF

Notary Seal:



Notarized Online with NotaryLive.com

PETITION REQUESTING PUBLIC HEARING AND OVERSIGHT INQUIRY

TO: The Pittsburgh City Council and City Clerk Kimberly Clark-Baskin

FROM: The Undersigned Residents of the City of Pittsburgh

SUBJECT: Demand for Investigation into Records Tampering and Municipal Fraud (660 First Ave)

STATEMENT OF GRIEVANCE:

We, the undersigned residents and qualified electors of the City of Pittsburgh, hereby petition the City Council to exercise its investigatory power under Section 301 of the Home Rule Charter regarding a documented breakdown of municipal integrity at the Pittsburgh Municipal Court Records Section.

Specifically, we demand a public hearing and formal oversight inquiry into:

1. **Records Tampering (18 Pa. C.S. § 4911):** The alleged "vanishing" of supplemental evidence submitted on January 29th and the lack of digital records for documented municipal transactions.
2. **Financial Misconduct:** The unauthorized acceptance of **cash payments** by records staff at 660 First Avenue in direct violation of Bureau of Police policy.
3. **Official Oppression:** The use of "shadow-record" protocols to obstruct a citizen's Constitutional Right to Petition for Redress.

WE, THE UNDERSIGNED, INTEND TO ATTEND THE REQUESTED PUBLIC HEARING.

Signature	Printed Name	Residence Address (Must be City of PGH)	Phone Number	Date
	Hijana Hasah	411 Wood St.	412-449-0982	1/8 2/26
	Annie Harris	345 9th Ave	859-109-8198	
	Ra @	2205 Vele...		
	Orit Funke	100 Forbes Ave		2/5/26
	Fiteum Kelly	413 Bidle Ave	314 229 7728	2/8/26
	Bida Bamba		412-229-0604	2/6/26

7. Devon FLEWIS, 111 William Penn Pl, Pittsburgh PA 15219 2/8
8. Raul ^{Pinar} 1740 Illinois ave Pittsburgh 2/8
9. Anthony Stanziano 3101 Northview St Pittsburgh PA 15203
10. Alex Kirienko 526 Penn Ave 507, 15222 PA. 2/8/2026
11. Jamal Cooper 3237 W Liberty ave R-8-26
12. Kaden Warner 201 Wood Street 2/8/2026
13. Sarah Ake 201 Wood Street 2/8/2026
14. Ellie Root 201 Wood Street 2/8/2026
15. Aries Cousins 201 Wood Street 2/8/2026
16. Aidan Wazy 201 Wood St 2/8/26
17. Mia Malsala 201 Wood St 2/8/26
18. Alyssa Jacoby 362 Meyran Ave 2/8/26 2/8
19. Sam Alawadhi 201 Wood st 2/8/26 2/8
20. ~~Liska~~ Rak 306 4th Ave 2001 2/8
21. Cassidy Russell ⁶⁹¹⁷ 1301 Liberty Ave, PA 15222 2/8
22. Mi'Angel Visher 3314 Pleasant Road Pa 2/8
23. Rachel O'Connor 100 7th Street Unit 507 Pitts 15222 2/8
24. Edward O'Connor 100 7th Street Apt 507 Pitts 15222 2/8
25. Juan Farof 313 Smithfield St 2/8
26. Molly Herz 8 Allegheny Center Pittsburgh, PA 15212 2/8
27. Yadelys Suarez 201 Wood St Pittsburgh, PA 15222

- 28. Cynthia Martinez, 201 Wood St Pittsburgh PA
- 29. ~~XXXXXXXXXX~~ Pamela Boyle
320 F Duquesne Blvd 15222
- 30. Osei McClendon 2696 Goldstrum Ave PA 15222
- 31. Avery Crook Point Park University Duquesne PA 15110
- 32. Kyleigh Nacy Point Park University 15110
- 33. Imani Jenkins 3592 Brighton Rd 2/8/24