

Formal Complaint Regarding Suspected Short-Term Rental Fraud, Misrepresentation of Occupancy, and Code Violations at 409 S. Regester Street, Baltimore, Maryland

Executive Summary

This complaint documents a series of serious and ongoing violations involving the property at 409 S. Regester Street, Baltimore, MD 21231, owned and operated by Latonya Watson. It presents credible evidence of:

1. Contradictory statements under oath regarding owner occupancy;
2. Operating an unlicensed short-term rental for commercial gain;
3. Submission of potentially falsified documents to the Department of Housing & Community Development (DHCD);
4. A documented pattern of sanitation and safety code violations;
5. Failure to comply with municipal short-term rental laws requiring owner occupancy.

Based on the documentation reviewed, this complaint calls for a formal investigation by the City of Baltimore's Department of Housing & Community Development, and potential referral for criminal perjury or fraud, if applicable.

Background: Applicable Law

Baltimore City Municipal Code §14-351 governs short-term rentals. Key provisions include:

- The property must be the applicant's primary residence.
- The rental must be either hosted (owner-occupied) or unhosted, with stricter conditions for unhosted rentals.
- Providing false or misleading information in STR registration constitutes fraud and may trigger civil and criminal penalties.

Evidence of Misrepresentation in STR Applications

Two STR registration records submitted by Latonya Watson are central to this complaint.

1. Record STR-2405 (Created: August 28, 2022)

- The applicant states under oath:
"Is this an owner occupied property?" → Answer: No
- The field for "Hosted Unit (Owner Occupied)" is left blank or marked with a dash.
- The applicant signs under penalty of perjury affirming all information as true.

2. Record STR-3174 (Created: August 8, 2024)

- In direct contradiction to the earlier filing, the applicant states:
"Is this an owner occupied property?" → Answer: Yes
"Confirm this is a hosted unit" → Hosted
"This is the primary residence of the owner."

This inconsistency raises the serious possibility that one or both STR registration statements are false, constituting a potential perjury offense under Maryland Code, Criminal Law §9–101.

Pattern of Licensing and Regulatory Violations

According to Baltimore Housing citation records, the following violations have occurred at this address:

Citation Date	Description
07/14/2023	Operating a short-term rental with no license
07/14/2023	Duplicate STR violation, no license
10/22/2021	Improper trash storage
01/22/2021	Trash accumulation and missing receptacle lids
09/19/2019	Repeated trash violations, non-collection day infractions

These citations establish a long-term pattern of both non-compliance and public nuisance tied to the property's operations as a transient lodging business.

Analysis of STR Eligibility Requirements

Under current law:

- A non-owner-occupied property is ineligible for STR operation unless it is:
 - Part of a multi-unit structure where the owner lives in another unit;
 - Operated under a commercial lodging license, which this property is not.

STR-2405 explicitly confirms the property is not owner occupied, thereby disqualifying it from legal short-term rental operation. However, in 2024, the applicant reversed this assertion to renew the license, claiming primary residence status.

This inconsistency strongly supports a finding of intentional misrepresentation to acquire an STR license unlawfully.

Additional Red Flags and Public Records Discrepancies

- In LinkedIn public disclosures, Latonya Watson lists her place of business as Ellicott City, MD—not Baltimore—undermining her claim of Baltimore City primary residency【User Image Submission】.
- The registration form for STR-2405 omits the required MD tax registration number, further suggesting a lack of compliance with state-level business laws.

Recommendations

Based on the evidence presented, we urge the following immediate actions by the City of Baltimore:

1. Initiate a formal enforcement investigation into STR-2405 and STR-3174 for false declarations.
2. Issue a cease and desist order suspending all short-term rental activity at 409 S. Regester Street.
3. Refer the case to the Office of the Inspector General or State's Attorney for potential prosecution under perjury, fraud, or falsification of official documents statutes.
4. Conduct a tax compliance audit in coordination with the Maryland Comptroller's Office.

5. Review other properties owned by the same party or business entity (VIM) for similar misconduct.

Conclusion

The body of evidence reviewed demonstrates deliberate attempts to circumvent STR laws by manipulating the owner occupancy requirement and operating without proper licensing. The contradictory statements under oath and repeated civil citations make this a compelling case for enforcement and further legal review.

Baltimore residents deserve compliance with housing laws designed to protect the community from abuse of short-term rental programs. As such, failure to act on these allegations would signal tolerance of fraud and regulatory evasion.

II. Property and Licensing Background

Item	Detail
Address	409 S. Regester Street, Baltimore MD 21231
Neighborhood	Fells Point
STR License Number (on record)	STR-3174
License Type	Hosted (Owner-Occupied)
License Holder	Latonya K. Watson
SDAT Ownership	Latonya K. Watson & Steven Watson
Airbnb Listing Registration Displayed	STR-963684 (unauthorized number)
Listing Host Name	"Vim"
Platform Link	https://www.airbnb.com/l/zgye7IMY

Under Baltimore's regulatory structure, a "hosted" license is strictly limited to an owner's primary residence—the dwelling where the licensee actually lives and is present during rentals. An unhosted license, by contrast, allows rental of a separate property but is capped at one per person and carries heavier inspection and tax obligations. Misclassifying a property as hosted constitutes a direct misrepresentation on a government filing.

III. Regulatory Framework

1. Relevant Statutes

- a. § 15-11-09 – Owner-Occupancy Requirement: The owner of a hosted short-term rental must occupy the dwelling as their primary residence and be present during guest occupancy.
- b. § 15-11-12 – Unhosted Rental Limitation: A natural person may license no more than one unhosted unit and may not operate additional unhosted rentals under another's hosted license.
- c. § 15-11-19 – False or Misleading Statements: Any falsification of material facts in an application—including primary-residence certification or registration number display—constitutes a violation subject to revocation, fines, and potential criminal referral.
- d. § 15-11-22 – Revocation and Penalties: Licenses may be revoked for misrepresentation or operation inconsistent with certified use.

2. **Legislative Intent:** Baltimore City enacted its short-term-rental ordinance in 2019 to protect neighborhood stability, ensure tax equity, and curb speculative commercial conversions of housing stock. The distinction between hosted and unhosted units was central: allowing residents to supplement income from their primary home while preventing investor-driven hotelization of residential blocks.

IV. Evidence of Unhosted Commercial Operation

A. Listing Content and Marketing

The Airbnb page clearly advertises the entire home, with wording such as:

“This is a 3 bedroom / 3 bathroom townhome ... Sleeps 8 guests comfortably ... Enjoy city views from the rooftop deck.”

There is no mention of a host’s presence or shared areas. Guests are instructed to self-check-in using a keypad. The home includes multiple large televisions, full kitchen, and private bathrooms—features typical of stand-alone lodging rather than owner-occupied quarters.

B. Guest Reviews and Timeline of Activity

Collected screenshots from the Airbnb platform show an unbroken sequence of reviews from January 2024 through June 2025, with additional records reaching back into 2023. Representative examples include:

- “We were three couples sharing the three-bed, three-bath house... Everything worked out perfectly for us.” — Sandra, Jonesboro AR (Nov 2023)
- “We were in Baltimore for one night to attend an O’s game... Each bedroom having its own bathroom.” — Jennifer, Richmond VA (Jun 2025)
- “My friends and I had a wonderful stay... close to many fun things to do in Fells Point.” — Dave, CA (May 2025)
- “Great house, very roomy with cozy common space... Perfect location in Fells Point.” — Lisa, PA (Dec 2023)

The geographic distribution of reviewers—California, Georgia, Michigan, Arkansas, Puerto Rico, New York, and others—confirms a tourism-driven clientele, not local co-residents. The rental cadence averages multiple parties per month, implying a year-round business enterprise.

C. Absence of Owner Presence

Nowhere in hundreds of guest comments is there any reference to meeting or cohabiting with an owner. Instead, reviewers uniformly describe:

- “Easy self check-in.”
- “Clear instructions.”
- “Responsive host Vim.”
- “We never met the host in person.”

These are hallmarks of remote property management. The named host “Vim” is not the licensed owner, indicating that the property is run by a proxy or third-party manager.

D. False Registration Display

The Airbnb listing lists a “Registration Details” code STR-963684, which does not correspond to any DHCD record for 409 S. Regester Street. The legitimate license, STR-3174, is never displayed on the public listing. Posting a false number is itself a material misrepresentation under § 15-11-19.

E. Pattern and Duration

The operation spans at least 24 months of continuous activity, with no recorded seasonal gaps or evidence of owner occupation. Review frequency averages one per week—a density incompatible with a shared primary residence.

V. Analysis of Misrepresentation and Legal Implications

A. False Owner-Occupancy Certification

When applying for STR-3174, Latonya K. Watson attested under penalty of perjury that 409 S. Regester Street is her primary residence. However, the evidence shows that:

1. The home is continuously offered as an entire-unit rental;
2. Guests occupy all bedrooms and bathrooms;
3. No host resides on-site;
4. Communication and management occur remotely.

These conditions directly contradict the definition of a hosted rental. The owner-occupancy certification is therefore false, triggering § 15-11-19 penalties and potential license revocation.

B. Use of Non-Owner Manager

Baltimore's ordinance allows limited assistance from a property manager but still requires the owner to be present during guest occupancy. "Vim" functions instead as a remote operator: handling messaging, maintenance, and guest access. This constitutes delegation of the entire lodging function—converting the property into a de facto hotel.

C. Unauthorized Registration Number

Displaying a fabricated or borrowed registration number (STR-963684) misleads both guests and regulators. The mismatch conceals the property's true license status and frustrates enforcement tracking. Under § 15-11-19(b), each instance of such misrepresentation is a separate violation.

D. Consumer and Community Impact

1. Public Deception – Travelers believe they are booking a city-certified, legally compliant home.
2. Neighborhood Nuisance Risk – Rotating guest groups (up to 8 people) strain parking, trash collection, and noise tolerance.
3. Market Distortion – Illegal unhosted units displace legitimate resident hosts and inflate housing costs.

E. Precedent and Pattern

Similar falsifications have appeared in other Baltimore neighborhoods, but this case presents unusually strong documentation: a direct comparison between the city-issued license record (hosted) and the platform's self-advertised unhosted activity. It therefore serves as an instructive precedent for broader enforcement.

VI. Corroborating Documentation

1. Official Licensing Records – PDFs from DHCD confirming STR-3174 issued to Latonya K. Watson as hosted.
2. SDAT Ownership Record – Title and mailing address verifying non-rental classification.
3. Airbnb Listing Screenshots – Full description, house rules, capacity (8 guests), registration number (STR-963684).

4. Guest Reviews (2023 – 2025) – Chronological record of transient, out-of-state use.
5. Image Evidence – Photographs and screenshots establishing “entire home” offering and rooftop deck amenities.

All exhibits demonstrate ongoing commercial use incompatible with owner occupancy.

VII. Legal Consequences and Enforcement Options

1. Immediate Revocation of STR-3174: DHCD may revoke the license under § 15-11-22 for operation inconsistent with certification.
2. Civil Penalties and Daily Fines: Each day of unhosted operation under a falsified license constitutes a separate offense. Fines may exceed \$1,000 per day.
3. Referral to Baltimore City Law Department: Intentional misrepresentation on a government filing may warrant civil enforcement or prosecution for false statements.
4. Airbnb Compliance Notification: Under the platform’s Baltimore data-sharing agreement, DHCD can direct Airbnb to remove the listing until verified compliance is achieved.
5. Audit of Tax Remittances: The Comptroller’s Office may assess back hotel-tax obligations for unlicensed nights sold under a false hosted license.

VIII. Policy Recommendations

1. Strengthen Cross-Verification: Require automated matching of registration numbers on booking platforms with DHCD’s database to prevent falsified listings.
2. Publish Violation Registry: Establish a public portal listing revoked or suspended STR licenses.
3. Increase Fines for Misrepresentation: Current penalties are inadequate compared to rental revenue; higher deterrent thresholds are necessary.
4. Neighborhood Notification: Mandate mailed notice to adjacent property owners when a hosted license is issued or renewed, to allow community oversight.
5. Data-Driven Enforcement: Use platform data feeds to flag units exceeding occupancy or showing continuous bookings inconsistent with owner residency.

IX. Conclusion

The evidence presented here demonstrates beyond reasonable doubt that 409 S. Regester Street has been misrepresented as a hosted short-term rental while functioning as a full-time, unhosted commercial lodging operation. The falsified owner-occupancy certification and use of an unauthorized registration number constitute material violations of Baltimore City Code Article 15, Subtitle 11.

Enforcement action is warranted to:

- Protect neighborhood integrity in Fells Point;
- Restore parity among lawful hosts;
- Reinforce public confidence in Baltimore’s licensing system; and
- Deter further falsification of city records.

Requested Actions:

1. Immediate suspension and revocation of STR-3174;
2. Issuance of daily civil fines for operating unhosted;
3. Public referral to the Baltimore City Law Department for false statement review;
4. Directive to Airbnb for listing removal pending compliance.

9:15



Vim

Superhost

491

Reviews

4.85 ★

Rating

3

Years hosting



My work: Cloud Developer



What makes my home unique: Rooftop sunset and city views.



Favorite song in high school: Any song from the 80s



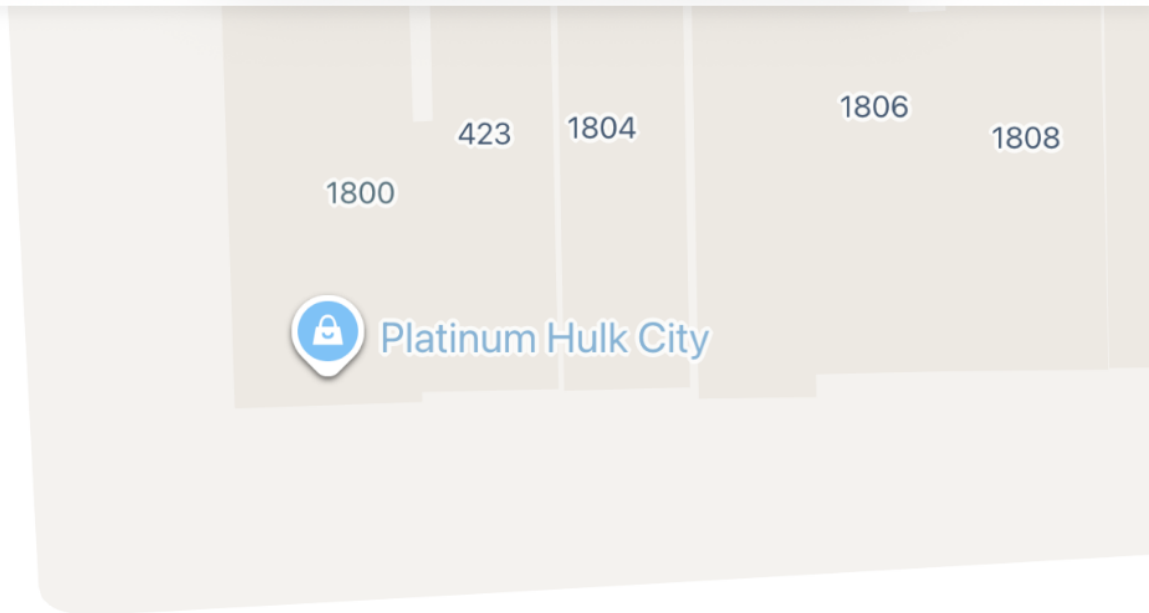
I'm obsessed with: TEA. I'll have TEA, please

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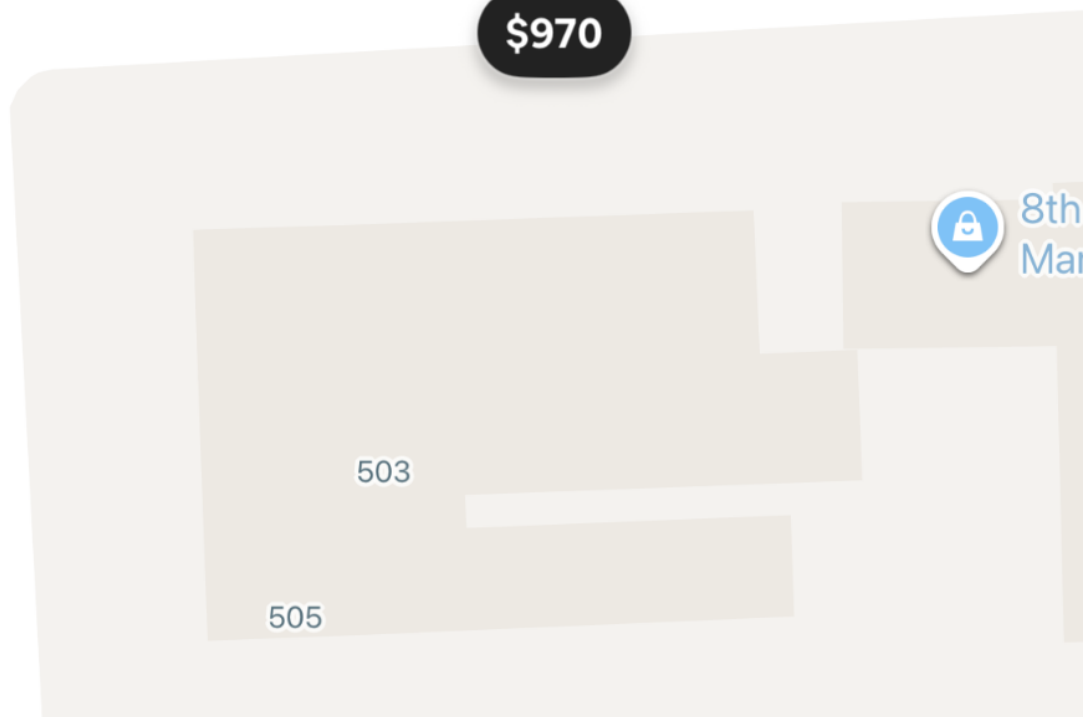
Homes in Map area

Dec 2 – 5 · 8 guests



Eastern Ave

\$970



9:16



Photo tour

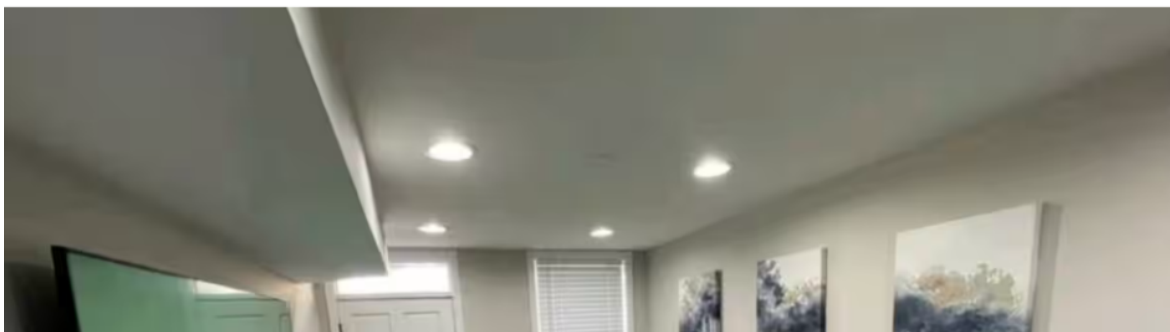


Exterior



Additional photos

Living room



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Exterior

51 / 63





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Google
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