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VIA EMAIL AND FIRST-CLASS MAIL

The Honorable Jeffrey S. Shapiro, Inspector General
Office of the Inspector General
One Ashburton Place, Room 1311
Boston, MA 02108

Re: Request for Investigation into the Procurement and Conditional Award of the Springfield Regional Justice Center (DCAMM Bid No. BD-25-1019-DCP06-OOL01-118407) Dear Inspector General Shapiro:

I represent USPB JV, LLC and Springfield Tower Square, LLC, two special-purpose entities that submitted proposals in response to the Request For Proposals ("RFP") from the Massachusetts Department of Capital Asset Management and Maintenance ("DCAMM"), seeking bids to build the new Springfield Regional Justice Center ("SRJC").

On July 2, 2026, DCAMM announced its decision to conditionally award a nearly $2 billion, 40-year lease for that generational public project to the "Liberty Junction Team," which purportedly comprised FD Stonewater and CoJo Partners, with FDS MA Liberty Junction as the named landlord. We believe the bid process, and the resulting award, warrants an immediate investigation by your Office under its charge to prevent fraud, waste, and abuse in the use of public assets.[1]

The Relevant Facts

In January 2025, the Massachusetts Trial Court proposed the SRJC project to the Massachusetts Asset Management Board ("AMB"), emphasizing its significance and noting that the SRJC would "fulfill both a functional need and a symbolic one for the Commonwealth," and that it should "represent the ideals of restorative justice in a dignified, safe, and appropriate manner."[2] AMB approval was necessary because the project sought authorization for a long-term lease of 40 years, with the option for two 10-year extensions. The AMB voted to approve the SRJC project on January 21, 2025. On June 12, 2025, DCAMM announced that it had engaged

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[1] *See* Office of Inspector General, *Public Procurement* (last visited Aug. 4, 2026), https://maoig.gov/procurement-support/ ("When the public's money is used to purchase, build or repair anything … the public has a tremendous interest in how that entity goes about procuring anything.").

[2] Massachusetts Trial Court, *Acquisition of Springfield Regional Justice Center Facility Lease for Massachusetts Trial Court,* Project Proposal to the Asset Management Board (Jan. 21, 2025), https://www.mass.gov/doc/springfield-regional-justice-center-amb-project-proposal.

Greystone Real Estate Advisory Group to "ensure a highly robust, competitive, open, and fair procurement process."[3] Thereafter, in June 2025, DCAMM issued an RFP inviting bids from interested parties.

On July 2, 2026, DCAMM announced its conditional selection of the Liberty Junction Team bid, touting the participation of FD Stonewater and "CoJo Partners, a Massachusetts-based minority-owned development firm."[4]

DCAMM's announcement did not note any of the significant problems presented by the Liberty Junction bid. First, as Liberty Junction's proposal documents and other materials released by DCAMM after its conditional selection demonstrate, DCAMM's decision was tainted by a conflict of interest involving John Barros, who was identified as principal of, and active participant in the Liberty Junction Team, while simultaneously serving as the Interim Executive Director of the Massachusetts Convention Center Authority ("MCCA"). Mr. Barros was appointed during the pendency of the bid by the MCCA Board of Directors, which included the Secretary of the Executive Office for Administration and Finance, who also oversees DCAMM. From the publicly released materials on DCAMM's website, none of the three inquiries DCAMM made seeking additional information from the Liberty Junction Team prior to selecting that bid for the project requested any clarification regarding Mr. Barros's conflict of interest or the role he would play in the Liberty Junction bid. The Liberty Junction Team's proposal also failed to satisfy DCAMM's RFP requirements, as their proposal on its face did not demonstrate the required site control.[5]

Our clients have already presented the following facts to the Hampden County Superior Court in a Verified Complaint filed on July 9, 2026, and a Supplemental Memorandum filed on July 30, 2026, in *USPB JV, LLC, et al. v. DCAMM, et al.* (No. 2679CV00453), where a hearing is set for August 11, 2026. We bring these facts to your attention because they implicate the procurement-integrity concerns your Office was created to address.

- **An undisclosed conflict of interest involving a sitting state agency head.** The Liberty Junction Team's October 16, 2025, proposal named Mr. Barros as a principal through CoJo Partners, the entity he jointly owned with Conan Harris (the husband of U.S. Representative Ayanna Pressley). On January 9, 2026, roughly six weeks after the proposal was submitted, and while DCAMM was actively evaluating bids, the MCCA

[3] Press Release, *Healey-Driscoll Administration Hires Advisor to Help Facilitate Major Springfield Courthouse Project* (June 12, 2025), https://www:mass.gov/news/healey-driscolladministration-hires-advisor-to-help-facilitate-major-springfield-courthouse-project.
[4] *See* Div. of Cap. Asset Mgmt. & Maint., *Development Team Selected for New Roderick L. Ireland Regional Justice Center in Springfield*, Mass.gov (July 2, 2026), https://www.mass.gov/news/development-team-selected-for-new-roderick-l-ireland-regional-justice-center-in-springfield.
[5] *See* Liberty Junction Team, *Springfield Regional Justice Center Cost Proposal* (Oct. 16, 2025), https://www.mass.gov/doc/springfield-regional-justice-center-liberty-junction-proposal/download.

Board appointed Mr. Barros as its Interim Executive Director. The MCCA is a state agency whose board includes senior government officials; the Secretary of Administration and Finance, Matthew Gorzkowicz, sits on the MCCA board, serves as Treasurer of the MCCA, and has supervisory authority over DCAMM. The MCCA also owns and operates the MassMutual Center in Springfield, which is located a short walk from the Liberty Junction site.

- **A sworn financial disclosure that omitted the conflicted financial interest, followed by a belated disclosure filed only after the award.** On March 17, 2026, Mr. Barros filed his required Statement of Financial Interest with the State Ethics Commission, signed under the penalties of perjury. That filing failed to disclose his interest in CoJo Partners or any other Liberty Junction Team entity, even though those entities had a pending, nearly $2 billion, proposal before DCAMM. Mr. Barros did not file a disclosure under M.G.L. c. 268A, § 7 until July 1, 2026—one day after DCAMM's June 30 conditional award and one day prior to its public announcement. A disclosure filed only after the conflicted process has run its course cannot cure a selection that the conflict already tainted.

- **The conflict was not incidental, since Mr. Barros's participation appears to have influenced the award.** At a March 5, 2026, clarification interview, DCAMM's Peter Woodford asked the Liberty Junction Team about the relationship between FDS and CoJo, and the implications of Mr. Barros's MCCA appointment. The Liberty Junction Team responded that their team would be a "Partnership [between FDS and CoJo] with FDS taking the lead" but that "Barros will still be an owner." Thereafter, in an April 11, 2026, response to a DCAMM follow-up inquiry, the Liberty Junction Team heavily stressed Mr. Barros's involvement with the project, devoting three of its four cited development examples to Mr. Barros's personal experience and qualifications.[6] Moreover, the SRJC Selection Committee's June 30, 2026, recommendation memorandum credited the team's experience and its "Access and Opportunity" response, which had expressly and primarily relied on Mr. Barros's entity and expertise. The Liberty Junction Team's use of Mr. Barros's qualifications, expertise, and likeness to bolster their bid implicates the requirements of M.G.L. c. 268A, § 9(a).

- **DCAMM's own selection letter acknowledged the conflict and tried to push it off until after the award.** DCAMM's June 30, 2026, conditional selection letter directed the Liberty Junction Team to "consult with the State Ethics Commission regarding any actual, potential, or perceived conflicts of interest." That directive is itself an admission that DCAMM recognized the conflict yet deferred any resolution until after the team had been chosen. However, the conflict is too significant to be disregarded until after the selection process has concluded. For example, in response to a public records request, the MCCA reported that it has in its possession roughly 4,000 documents exchanged with DCAMM

[6] *See* Liberty Junction Team, *Responses to DCAMM Letter dated April 6, 2026 (125 Liberty St 3rd Clarifications* (April 10, 2026), https://www.mass.gov/doc/125-liberty-st-3rd-clarifications/download.

between January 2025 and July 2026—an amount equivalent to approximately ten email exchanges every business day. Where two agencies maintain such close contact, a conflict arising from the head of one agency having a financial interest in the outcome of the other's procurement process cannot be remedied after the award has been made. Likewise, Mr. Barros's July 29, 2026, announcement that he would "divest" his interest in the Liberty Junction Team following the award cannot cure the conflict that existed during the procurement process.

- **DCAMM applied its conflict rules unevenly.** Through Addendum 5 of the RFP, DCAMM incorporated M.G.L. c. 268A, M.G.L. c. 7B, § 4, and 810 CMR 2.02 into the RFP, and precluded certain former DCAMM-affiliated individuals from participating on prospective bidding teams. DCAMM stringently enforced those restrictions upon our clients, yet applied no comparable scrutiny to the head of another agency who was a named principal of the winning bid and featured prominently throughout the Liberty Junction Team's proposal.

- **The winning proposal did not satisfy the RFP's site-control requirement.** The RFP permitted proposals only from "eligible proposers" with control rights over the site they were developing. The named proposer, FDS MA Liberty Junction, LLC, held no such rights: the option to lease the 125 Liberty Street property, held by FD Stonewater with Northeastern Investments LLC ("Northeastern Investments"), expired May 9, 2026, with no extension or assignment granted to the proposer disclosed in the RFP; and the 280 Chestnut Street parcel was held by yet another affiliate. On August 3, 2026, FDS MA Liberty Junction submitted in the ongoing Hampden Superior Court litigation an affidavit from Claiborne Williams, a principal of the Liberty Junction Team, representing that the option agreement with Northeastern Investments had been extended through November 9, 2026. DCAMM's conditional selection letter from June 30, however, confirms it did not have that information at the time of the award, noting the site control deficiency and stating that the selection "is based on Proposer's representation that it will satisfy the site control requirements set forth in the RFP."

- **The site was reshuffled for nominal consideration only after the Liberty Junction Team was awarded the bid.** Northeastern Investments, managed by Jaafer Eideh (who is not named anywhere in the Liberty Junction Team's proposal), held title to 125 Liberty Street. Five days after the award, on July 7, 2026, Mr. Eideh formed 125 Liberty LLC, and on July 18, 2026, Northeastern Investments conveyed the property to that new entity for less than $100. The November 2026 extension of the option agreement relied upon by Mr. Williams' affidavit is an agreement between FD Stonewater and Northeastern Investments, and the agreement makes no mention of 125 Liberty LLC, which now owns the property in question.

- **A member of the winning "team" did not legally exist at the time of the award.** CoJo Real Estate LLC (the legal name of the entity referred to as "CoJo Partners") was administratively dissolved on December 31, 2025, and did not apply for reinstatement until

July 27, 2026. Nevertheless, DCAMM announced a nearly $2 billion award to a team it identified as including that dissolved entity.

The Applegreen Precedent

The flawed process enveloping the SRJC bid bears eerie similarities to the failed 2025 MassDOT service-plaza procurement, as described in your Office's February 27, 2026, Investigatory Review of that procurement. During that review, your Office found that the process "was not a model procurement," the agency "failed to follow its own procurement rules," conflict-of-interest controls were inadequate, and the selection-committee members failed to record written justifications for their scores. As you put it, "[t]o suggest in its totality that the procurement was a model procurement would simply be inaccurate," and "[t]he OIG found too many flaws in this procurement to say with confidence that the procurement, had it been fully executed, was based on a solid foundation." The SRJC procurement presents many of the same categories of defects—only here the conflict runs through a sitting high-level agency head, and the contract is more than twice the size.

OIG's Mandate Is Clear

The OIG exists to prevent fraud, waste, and abuse and to protect the integrity of public procurements. We respectfully urge you to investigate and to ask, among other questions:

- Why did DCAMM permit a sitting state agency head to remain a named principal of the winning bid without a timely, valid conflict-of-interest disclosure *before* the conditional selection?

- Why did DCAMM defer the conflict question to the Ethics Commission only *after* the award?

- Why did DCAMM enforce its conflict rules inconsistently and unequally?

- How could the Liberty Junction Team have satisfied the site-control requirement articulated in the RFP when the option expired and title moved only after the award?

- How did DCAMM find a dissolved LLC eligible as part of the winning team?

As with the service-plaza procurement, the public deserves to understand how this decision was made before the Commonwealth locks taxpayers into a 40-year, nearly $2 billion commitment.

On behalf of our clients, we respectfully request that your Office investigate this procurement with the urgency and diligence the public deserves, and we are prepared to provide the underlying filings, exhibits, and public records to assist with your review.

Sincerely,

Felicia H. Ellsworth