

June 25, 2025

The Honorable Jeffrey Shapiro

One Ashburton Place
Boston, MA 02108

Dear Inspector General Shapiro,

I write to you today not only as the Chief Legal Officer of Global Partners LP (Global), a fourth-generation publicly traded, Massachusetts-based company with a 90-year history of service to this Commonwealth, but as a deeply concerned citizen.

MassDOT's recent decision to award a 35-year lease to operate and redevelop the Turnpike service plazas (MassDOT Bid No. BD-25-1030-CP01-107836) to Applegreen Limited (Applegreen), a foreign, majority Blackstone-owned firm, despite Global's substantially superior bid, raises serious red flags. We believe this process, and the resulting award, warrant immediate investigation by your office based on the following concerns, which fall squarely within your charge to prevent fraud, waste, and abuse in the use of public assets:

1. Nearly \$900 Million in Lost Public Value.

An accounting of Applegreen's proposal, as presented in MassDOT Chief Development Officer Scott Bosworth's presentation to the MassDOT Board of Directors (Board), on June 18, 2025, against Global's offer clearly demonstrates that Global's offer is worth nearly \$900 million more in guaranteed rent over the life of the lease. Our proposal also included more than double the fuel revenue share and nearly twice the revenue share from convenience and food sales post-revitalization. These are not small differences, this is critical funding that could directly support the Commonwealth's infrastructure investments and long-term fiscal health. The table below is a comparison of Global's offer to Applegreen¹.

	Global Partners	Applegreen / Blackstone
Total Guaranteed Rent	\$1.512 billion (firm and guaranteed)	\$623 million up to \$994 million (per MassDOT presentation, total estimated rent is estimated, not a guaranteed amount)

¹ Applegreen numbers as presented in the June 18, 2025 MassDOT Board meeting. Global's numbers come from our RPF submittal.

Fuel Rent	\$0.12/gallon (pre & post revitalization)	\$0.072/gallon (pre), dropping to \$0.059/gallon (post revitalization of each individual site, rent reduction at certain sites could occur within first 12-18 months of lease term)
Gross Sales Rent	10% (pre & post revitalization)	13.8% (pre), dropping to 5.32% (post revitalization)
Annual Guaranteed Rent	\$25 million/year starting rent (firm)	Estimated ² \$16.4 million (pre), dropping to \$14.3 million (post revitalization)
Total Capital Investment (<i>initial revitalization plus investment over 35 year term</i>)	\$649 million	\$750 million
Supplier Diversity Commitment	5% of contract value (with 15% goal)	2% of contract value (with 10% goal)

Despite these disparities, Mr. Bosworth characterized the financials as “very close” to the MassDOT Board, a materially misleading statement that downplayed a nearly \$900 million³ differential in guaranteed public value.

The scoring criteria used in MassDOT’s evaluation process allocated only 25% to financial commitment, the one truly objective metric, while the remaining 75% was based on subjective measures. Yet even within those subjective areas, we believe Global submitted the stronger proposal. Our commitment to supplier diversity (5% of contract value with a 15% goal) far exceeded Applegreen’s mere 2%, and our transition and operations plans were rooted in firsthand experience having run significant portions of the current operations at these plazas, which no other bidder could claim. Despite this, no transparent scorecard or side-by-side evaluation was made public, leaving significant questions about how the subjective criteria were applied, and whether they were used to rationalize a pre-determined outcome.

2. Misrepresentation and Opaque Process

This process lacked basic public transparency:

- No side-by-side bid comparison was presented publicly, nor do we believe to the MassDOT Board.

² Mr. Bosworth presented Applegreen’s Post-Revitalization Minimum Annual Guaranteed Rent as an “estimated” amount. However, Mr. Bosworth’s presentation also noted that Applegreen’s proposed rent could result in total rent to MassDOT as low as \$623 million, which mathematically suggests that Applegreen’s Minimum Annual Guaranteed Rent post-revitalization could be as low as approximately \$11 million per year.

³ Initial media reports indicated that Applegreen’s proposal would result in approximately \$1 billion in rent to MassDOT, \$500 million less than Global’s proposal. However, per Mr. Bosworth presentation, Applegreen’s proposed rent could result in total rent to MassDOT as low as \$623 million, nearly \$900 million less than Global’s proposal.

- No explanation was offered for MassDOT's dismissal of nearly \$900 million in guaranteed rent.
- When questioned, Mr. Bosworth refused to directly address Global's financial proposal, instead mischaracterizing our numbers and casting subjective doubt on our credibility.

This is not how public procurement should work. When nearly a billion dollars in guaranteed value is at stake, the public deserves transparency, not misdirection.

3. Immediate Fiscal Consequences

If executed, this lease will reduce annual travel plaza revenue to the Commonwealth from roughly \$30–\$32 million down to at most \$14–\$16 million, cutting the Commonwealth's income by nearly 50% annually from day one. That shortfall will almost certainly shift pressure onto the Commonwealth's already strained budget, increasing reliance on federal infrastructure dollars and tolling. It's irresponsible and unsustainable.

4. Lack of Financial Safeguards

Global, a Fortune 500 company, was prepared to provide an unconditional parent guarantee, as originally required under the terms of the RFP. This crucial protection was removed via *Addendum 3*, a quiet change late in the RFP process. This change released Applegreen from making a similar commitment and exposing the Commonwealth to the risk of a shell entity walking away⁴. This is even more concerning in light of the Board's questions about ensuring Applegreen is able to fulfill their obligations and Mr. Bosworth's assurances MassDOT would hold Applegreen accountable through liquidated damages. If Applegreen's shell is unable to perform and is collapsed, there are no mechanisms to hold Applegreen's accountable. This is exactly the kind of loophole that private equity firms exploit. And even more concerning is Applegreen's track record, including a request for a \$260 million taxpayer-funded bailout in New York for overruns on a similar project. The signs are clear.

5. Politicized Procurement

Just this week, the Legislature agreed to new transparency rules to improve public confidence in state decision-making, promising to shed light on opaque processes long criticized as exclusionary and hidden. The MassDOT decision flies in the face of that commitment. As your office knows, public confidence erodes not only through fraud, but through perception of favoritism, manipulation, or undue influence. Several changes to the RFP late in the process, including the removal of the guarantor concept identified

⁴ Despite this late change in the process, Global's proposal restated our commitment to provide such crucial financial assurances.

above, and an extension of the proposed lease term from 30 to 35 years, suggest that the RFP was being amended to favor certain bidders over others.

When a politically connected bidder wins despite offering less value, weaker commitments, and greater risk, something is wrong.

Your Mandate Is Clear

Your office exists to prevent waste, fraud, and abuse. We respectfully urge you to ask:

- Why did MassDOT overlook nearly \$900 million in guaranteed rent?
- Why was there no public financial comparison between bidders? Was the comparison made available to the Board?
- Why was a financial safeguard quietly removed during the bid process?
- How will the Commonwealth offset the immediate \$15+ million in annual revenue loss?
- What oversight, if any, occurred in evaluating the long-term fiscal risk to a state so reliant on federal infrastructure dollars?
- Did improper communication between MassDOT and any bidder cause changes late in the RFP process or in their bids?

This is not simply a case of choosing between two visions. It is a case of walking away from an extremely high-value offer, with long-term consequences for taxpayers, public trust, and fiscal sustainability.

Last week, Eric Slifka, our CEO, sent a formal letter to Governor Healey (attached here) calling on her to take a hard look at the process and reconsider the recommendation considering the facts. That letter outlined our concerns about the lack of transparency, the significant financial disparity, and the long-term risk to the Commonwealth. While we remain hopeful that the Governor will act in the best interest of taxpayers, the lack of response only underscores the importance of your office's independent oversight.

On behalf of our 1,700 Massachusetts-based employees and the countless community partners who have spoken up with us, I respectfully request your office investigate this process with the urgency and diligence the public deserves.

Sincerely,



Sean T. Geary
Chief Legal Officer
Global Partners LP

cc: Attorney General Andrea Joy Campbell

Attachment (1)

The Honorable Maura Healey
Governor of the Commonwealth of Massachusetts
Massachusetts State House
24 Beacon Street
Boston, MA 02133

RE: MassDOT Turnpike Lease Recommendation Contradicts Your Stated Priorities and Neglects Your Financial Responsibility to the Commonwealth

Dear Governor Healey,

As someone who has always admired your public commitment to the people and economy of Massachusetts, I write to you not just as the CEO of Global Partners, but as a lifelong resident of this state, deeply concerned about a decision that threatens to undermine both public trust and fiscal responsibility.

You've said, "No one is going to compete harder as your governor than me... We've got to make sure we're competitive with other states when it comes to attracting and retaining employers and businesses and keeping our residents here in the state."¹

And yet, here we are, watching a 35-year state contract awarded to a foreign-owned, private equity-backed company, while a fourth-generation, Massachusetts-based employer who offered the state nearly \$900 million more in guaranteed rent is passed over. Those funds are critical to advancing the state's priorities, supporting infrastructure, education, and the residents who need it most.

This isn't about politics or preference. This is about taxpayer dollars and integrity.

The Facts Should Speak for Themselves². The table below is a comparison of Global's offer to Applegreen/Blackstone.

	Global Partners	Applegreen / Blackstone
Total Guaranteed Rent	\$1.512 billion (guaranteed)	\$623 million up to \$994 million (revenue-share, not guaranteed)
Fuel Rent	\$0.12/gallon (pre & post revitalization)	\$0.072/gallon (pre), dropping to \$0.059/gallon (post revitalization)

¹ (March 2023, Chamber of Commerce)

² Applegreen numbers as presented in the June 18th MassDOT Board Meeting. Global Partners numbers come from our RPF submittal.

Gross Sales Rent	10% (pre & post revitalization)	13.8% (pre), dropping to 5.32% (post revitalization)
Annual Guaranteed Rent	\$25 million/year starting rent (firm)	Estimated ³ \$16.4 million (pre), dropping to \$14.3 million (post)
Total Capital Investment	\$649 million	\$750 million
Supplier Diversity Commitment	5% of contract value (with 15% goal)	2% of contract value (with 10% goal, including Applegreen staff)

These numbers aren't close. The gap is astounding. Despite this, MassDOT's Chief Development Officer Scott Bosworth misled the MassDOT Board by stating the proposals were "very close." They are not. To be clear, he did not share Global's numbers publicly as a comparison. Only the numbers for the selected bidder. The gap is nearly \$900 million, and we believe the public deserves to understand how that discrepancy was minimized or overlooked.

It's also important to note that this decision creates an immediate budget gap, reducing current travel plaza rent from approximately \$30–\$32 million annually to just \$14–\$16 million. The Commonwealth will now need to find nearly \$15 million a year elsewhere to fill that hole.

To make matters worse, when questioned by a Board member about the reliability of Applegreen's numbers, Mr. Bosworth opened his response stating he wanted to focus on the recommendation and not talk bad about the other bidders. He then proceeded to state he found Applegreen's numbers more reliable because of their real-life experience and operations outside the state and found the other bid numbers to be unreliable. To be clear, Global is the only company that submitted a proposal that has actually operated the convenience stores and fueling stations at these plazas. If anyone can forecast volumes and financials accurately, it's us. His comment is offensive.

During our own oral interview, Mr. Bosworth questioned Global's financials because he confused fuel gallons with fuel revenue, costing our team 5 minutes of time to explain the difference. It has also been suggested that MassDOT encouraged Applegreen to "get closer" to Global's numbers during the evaluation process. This process is deeply flawed.

It's also important to highlight a late-stage change that creates additional risk to the State. The original RFP required bidders to provide an acceptable guarantor to unconditionally guarantee the obligations of the operating entity under the lease. But in the third addendum, MassDOT removed this requirement. Despite that shift, Global Partners stands ready and willing to provide a full, unconditional guarantee—something a private equity-backed special purpose vehicle like

³ By Applegreen

Applegreen's likely cannot and will not offer. The Commonwealth deserves more than a shell company backed by uncertain capital. It deserves a partner that's accountable and financially sound from day one.

Global proposed a bold, future-ready vision for these travel plazas. Tech-enabled, locally rooted, and built for what's next (we've included a few renderings to show you what that looks like).

We understand that this decision wasn't based on dollars alone. That's why our proposal delivered more than just financial value. It included a future-focused EV and fueling strategy rooted in our real-world experience deploying charging infrastructure and next-generation fuels across Massachusetts—paired with sustainable design, meaningful supplier diversity commitments, and a proven track record of operational excellence. And we backed it with \$650 million in capital investment and over \$1.5 billion in guaranteed rent for the Commonwealth.

We also partnered with organizations like CommonWealth Kitchen to ensure these plazas didn't just *look* like Massachusetts, they reflected our values and communities. We know our neighbors. We know our vendors. Applegreen can't say the same.

In fact, the individual hired to advise Applegreen on community engagement mistakenly referred to them as "Applebee's" during public testimony—like it was her first meeting with them. That says everything.

In July of 2024, you said "We're doing this all responsibly, fiscally responsibly... every taxpayer dollar is focused on making life better."

How can this decision, one that leaves nearly a billion dollars on the table be called responsible? How can an immediate \$15 million drop in revenue be responsible?

Blackstone majority-owned Applegreen sought a \$260 million taxpayer bailout in New York for cost overruns on a similar rest stop project. That's not a red flag that's a billboard. If this is the "real-world experience" MassDOT is excited about, then taxpayers should be alarmed.

Governor, you know us, but let me remind you. We built this company from a single heating oil truck to what it is today. An integrated supplier of energy products and guest focused retail experiences. We have over 1,700 employees in Massachusetts. In 2024 alone we paid over \$126 million in state taxes and supported over 110 local charities.

We're not just a bidder, we're part of the fabric of this state. We didn't just submit a proposal. We showed up, with over 300 employees, partners, and community leaders at the Board meeting. They took time off work, rode buses from every corner of the state, and stood shoulder to shoulder not because we told them to, but because they care deeply. Because they believe in this company and this state. They showed up for transparency. For fairness. For Massachusetts.

In your 2024 Budget Signing, you said, "Every taxpayer dollar must be focused on making life better... more affordable... and more competitive."

We couldn't agree more with your commitment to affordability and competitiveness. But let's be clear: we can't make life more affordable while turning our backs on nearly \$900 million; money that should go to our schools, infrastructure, and critical public services.

We can't claim to support a competitive business climate while favoring a politically connected firm and handing operations over to a private equity company, especially when a proven, Massachusetts-born operator with a 90-year track record is ready to deliver more value and less risk.

And we certainly can't rebuild public trust with a process that looks manipulated and leaves taxpayers asking serious questions.

You've always stood for fairness, fiscal responsibility, and accountable leadership. We're asking you to bring those values to bear right now.

Because this isn't just bad procurement, it's a nearly billion-dollar betrayal of public trust. I can't in my mind fathom how in good conscience, you would take that money from your constituents, and send it overseas to a private equity backed company. It makes no sense, and Maura, you are better than that.

Don't let this decision undercut your own goals and values. At the end of the day only you can lay your head down and feel confident that while you might have upset a few powerful people, you did what is right for the people who you are charged with to serve.

This is in your hands. Stand up for what's right. I urge you to intervene. Take a hard look. And ensure this decision serves the people of the Commonwealth, not just tomorrow, but for the next 35 years.

Respectfully,



Eric Slifka
Chief Executive Officer and President
Global Partners LP





Monica Tibbits-Nutt
Secretary of Transportation
Massachusetts Department of Transportation
10 Park Plaza, Suite 4160
Boston, MA 02116

June 30, 2025

**RE: Turnpike Travel Plaza Lease – Fiscal Misjudgment, Capital Investment
Misrepresentation, and IG Inquiry**

Dear Secretary Tibbits-Nutt,

MassDOT's recommendation to award the 35-year service plaza lease to Applegreen is more than just disappointing—it reflects a failure of fiduciary responsibility and a dismissal of sound public policy. This decision disregards the highest guaranteed financial offer, choosing instead a riskier partner while leaving nearly **\$900 million** in state revenue on the table. That is money that could have gone toward repairing our crumbling infrastructure and helping avoid future toll hikes for Massachusetts drivers.

In addition to Global's significantly higher financial return to MassDOT, we believe our proposal was superior with respect to operational experience, diversity commitments, and transition readiness. However, it does not appear that your team shared details regarding Global's proposal, nor did you make any accurate comparison of Global's proposal to other proposals, with you or the rest of the MassDOT Board. Instead, your team recommended a politically connected, foreign-owned firm with a record of requesting taxpayer funded bailouts and the typical inadequate financial assurances of a private-equity controlled entity. This recommendation and the lack of discussion regarding competing proposals defies logic, disregards common sense, and violates public trust.

MassDOT has publicly pointed to capital investment as a key factor in this decision¹. But both bidders submitted preliminary, non-binding estimates—there is no enforceable commitment behind those numbers. The facts do not support using capital expenditure alone as a justification for choosing Applegreen, especially in light of the significant revenue loss their proposal entails for the Commonwealth.

¹ Transcript at the June 18, 2025 MassDOT Board of Directors Hearing

Committed Capital (Estimate)	Applegreen	Global
Revitalization CapEx ²	\$383M	\$322M
Post-Revitalization CapEx ³	\$367M	\$327M

Global's slightly lower post-revitalization figure reflects operational efficiencies, economies of scale from managing hundreds of fueling stations and retail sites in this region. Meanwhile, Applegreen's "higher" capital projection is speculative. Given their \$260 million bailout request on the New York Thruway, the reliability of their financial projections should be questioned, not rewarded⁴.

Despite a nearly \$900 million difference in guaranteed rent, it appears that your team leaned on a subjective "Program Understanding" category, 5%, to tilt the scoring in Applegreen's favor. That's not transparent procurement. It's biased decision-making.

Governor Healey once said you "prioritize transparency and communication in [your] work, because [you] understand that earning the public's trust is key to a strong transportation system"⁵. This decision violates that principle. There was no public bid comparison, no honest financial framing, and no clear explanation as to why the state would reject a \$1.5 billion private revenue commitment in favor of one which could result in the state receiving revenue as little as \$623 million.

This choice also contradicts your publicly stated goal of maximizing federal infrastructure support. Turning down one of the largest privately funded infrastructure investments the state has ever seen undermines Massachusetts' credibility in asking Washington for more.

Massachusetts taxpayers deserve better. Applegreen has been accused of anti-competitive conduct and greenwashing in their native land⁶, and operates under typical private equity backed financial uncertainty, including massive debt.

Global employs over 1,700 Massachusetts residents and has operated in the state for four generations. We proposed a \$1.5 billion guaranteed offer backed by real-world execution, EV infrastructure, and REAL, authentic diversity partnerships like CommonWealth Kitchen. Our

² A detailed master revitalization plan must be finalized between MassDOT and the selected bidder following execution of a Transition Agreement and prior to execution of a final lease on or before November 3, 2025. In addition, the actual work to be completed at each individual service plaza is predicated on the finalization of a mutually satisfactory Plaza Management Plan. Individual Plaza Management Plans are developed AFTER signing the lease on a site by site basis and may be modified through 2028, including detailed construction plans, schedules and methods, financial analysis and financing details, and plaza-specific programming elements. Until such Plaza Management Plans are developed, reviewed, and approved by MassDOT, there is no binding commitment in the lease to spend the actual 'committed capital' highlighted by Mr. Bosworth (by either bidder).

³ Uncommitted funds with limited requirements.

⁴ <https://www.wxxinews.org/local-news/2023-05-04/new-york-thruway-rest-stops-bailout-rejected>

⁵ Boston Globe, Dec. 24, 2022

⁶ <https://sustainabilitymag-com.webpkgcache.com/doc/-/s/sustainabilitymag.com/articles/apple-faces-greenwashing-lawsuit-over-carbon-neutral-claims>

supplier diversity commitment was 5% of contract value with a 15% goal, Applegreen offered the minimum required of just 2%.

As a courtesy, I've attached our formal request to the Inspector General Shapiro regarding this matter. The public deserves to understand how this decision was made, why no public bid comparison was provided, and how nearly a billion dollars in guaranteed revenue was passed over for a foreign operator with a problematic track record.

Secretary, your office claims to prioritize transparency, equity, and maximizing public value. This decision fails on all three counts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Slifka', with a stylized flourish at the end.

Eric Slifka
President and CEO

CC:

Governor Maura Healey

Attorney General Andrea Campbell

Hayes Morrison, MassDOT Undersecretary

Eric D. Batista, MassDOT Director

Joseph Beggan, MassDOT Director

Ilyas Bhatti, MassDOT Director

Richard A. Dimino, MassDOT Director

Dr. Lisa I. Lezzoni, MassDOT Director

Timothy King, MassDOT Director

Thomas Koch, MassDOT Director

Dean Mazzearella, MassDOT Director

Tom McGee, MassDOT Director

Attachment: Letter to Inspector General Jeffrey Shapiro – June 25, 2025