

A Complaint to the Office of the Attorney General White Collar and Public Integrity Division



SaveOurBlock.org

**A COMPLAINT TO THE ATTORNEY GENERAL AGAINST SARAH STANTON,
FORMER TOWN MANAGER OF BEDFORD, MASSACHUSETTS**

It is the contention of this complaint that Sarah Stanton, when she was the Town Manager of Bedford, violated her oath of office, knowingly misled the volunteer Select Board members she was hired to assist, flagrantly deceived the public, manipulated the Town Meeting process, subverted the Open Meeting Law, and forced an unnecessarily expensive project on town residents through subterfuge.

The project is estimated to not only cost taxpayers more than twice what she projected, but is to be built on an obviously unsuitable site, requiring the destruction of a key part of the Bedford Historic District, while leaving many residents of Bedford underserved.

None of this would have happened except for the willful, wanton, and fraudulent nature of Stanton's tenure as Town Manager. The public should know If these allegations are true. To the extent that any of them may not be proven true, a thorough investigation is needed to establish that as well.

June 5, 2025

Office of the Attorney General
Deputy Division Chief Elizabeth Burke
White Collar and Public Integrity Division
One Ashburton Place
Boston, MA 02108

Re: Further to the 4/7/25 Online “Request for Review”

Dear Deputy Chief Burke,

What follows is my best effort to distill facts, gathered over three years, that have led to this complaint. I am confident that they reveal a deliberate intent on the part of former Bedford Town Manager Sarah Stanton to deceive Bedford residents and manipulate Town Meeting voters into purchasing property for a new fire station that is remarkably unsuitable. If that is true, she defeated the democratic process and defrauded the town and its people.

This report will be thorough in delineating the overall scope of the *public corruption, financial fraud, and other violations of the public trust* that are prosecuted by your division. In addition, it will include compelling circumstantial evidence that ties the facts together like ligaments.

Before condensing my online Request for Review into 1400 characters, I looked at many online definitions of *fraud* to make sure I was not overstating the charge. One of the best definitions states: “Fraud is a deceitful practice or willful device to deprive or injure another. It can also include acts, omissions, or concealments that breach legal or equitable duty, trust, or confidence.” That captures the essence of the corrupt practices I am reporting here.

The multiple corrupt practices that are described in this report were only possible through serial violations of the Open Meeting Law (OML). “The purpose of the Open Meeting Law is to ensure transparency in the deliberations on which public policy is based.” The democratic process “depends on the public having knowledge about the considerations underlying governmental action.”

And yet, the people of Bedford are set to invest \$40 million – up from the \$18 million forecast at the time of the purchase three years ago – while 10,000 voters have been kept in the dark regarding the narrative that follows and deprived of the salient facts.

Ms. Stanton’s methods and choices in this matter can’t be dismissed as incompetence, or a series of mistakes. Her experience and reputation as a talented administrator make that notion absurd. Neither can it be blamed on the daunting COVID environment. The public Select Board meeting minutes throughout 2020 and 2021 show an impressive amount of normalcy and attention to the town’s governance.

Furthermore, Select Board Executive Session minutes at the end of 2021 and beginning of 2022 display the members' clear dependence on the Town Manager's information. The following overview will present the most troubling elements of what took place.

The latitude that judges are given to declare the results of OML violations null and void is dramatic recognition of how completely disqualifying such illegal breaches can be. If that is true when less is at stake, how much more critical is it to provide the people of Bedford with all of the facts "about the considerations underlying" the current project at long last, instead of the deceptively selective account that distorted the picture of what is taking place here?

Laws were broken and the voters of Bedford were cheated. The malfeasance in plain site that developed into a massive fraud should not rest on a laymen's ability to make the case. I have presented enough hard evidence of serial irregularities to require they be refuted or exposed.

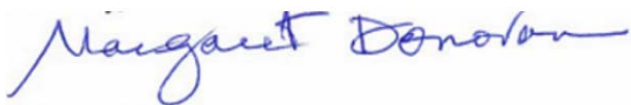
I have shared the ongoing results of my inquiry with officials from the beginning. I understand the unfortunate political challenges that may ensue. But a historic property is about to be leveled, a signature block is about to be spoiled, while not one of the allegations reported here has ever been addressed! A 40-million-dollar-project has never been scrutinized. **At what point does ignoring these claims amount to a blatant dereliction of duty?**

As long as the voters don't have the whole truth of what is behind this disgrace, democratic principles *are* being corrupted, and Bedford residents *are* being defrauded.

If what I have laid out here can be substantiated, the project unequivocally lacks a legal basis. **It was, therefore, an act of contempt for the rule of law -- after being alerted to a pending request for an investigation into the project's legitimacy -- when the Town, on this past Monday, June 2nd, started tearing up a property that they may lack the legal authority to touch.**

I sincerely hope that this appeal to the "People's Lawyer" will result in a thorough inquiry, including sworn statements from all participants, and public exposure of what went wrong at so many levels. A corrupt government official, who directly caused incalculable damage, should not be allowed to get away with it. She does not deserve a position of trust.

Respectfully submitted,



Margaret Donovan | SaveOurBlock.org

I am confident that the details provided here point to a deliberate effort to manipulate and cheat voters and, therefore, warrant a full investigation. The claims that I made in the 4/7/25 “Request for Review” are provided in italics before the relevant sections to substantiate what I wrote in my initial contact. The charges excerpted below, and more fully presented within, must either be established or refuted.

I. THE PROJECT BACKGROUND

The entire process violated the Open Meeting Law. The public was given no chance to observe and assess the reasoning behind this policy decision. The Town Manager broke the OML by defeating its statutory purpose. A rogue strategy was put in place to deliberately manipulate the outcome of a public election.

II. THE OFFICIAL TIMELINE AND PROMOTION

There was no lawful reason to keep an ongoing site selection process secret. Especially when the property finally chosen sat at the gateway to the town’s historic district. The Town’s official timeline appears to have been concocted at the time of marketing the project to describe a false narrative. That in itself, justifies an investigation for fraud.

III. THE SITE SELECTION

At the core of all the controversy surrounding the station was the Town Manager’s insistence that 175 and 139 The Great Road (TGR) were the only feasible sites. That was not credible on its face and no effort was ever made to demonstrate that it was factual – which would have shown good faith.

If there truly were no other suitable properties, abiding by the Chapter 30B requirement to advertise for proposals at least once a week for two weeks instead of skirting it by voting to declare it a “unique acquisition” would have gone a long way toward reassuring residents that the contention was true. Instead, it appeared to be the ploy that it was.

IV. THE PRELIMINARY INJUNCTION HEARING AND COUNTER-OFFER

What was the basis for telling the judge that “advertising would not benefit the town?” What was the harm in making sure that the integrity of the Historic District really had to be sacrificed? Without a doubt, something that would have taken a mere couple of weeks and established the veracity of the suspect “uniqueness” claim would have been in the people of Bedford’s manifest best interests.

V. THE HISTORIC DISTRICT COMMISSION

By creating the “hardship” strategy to begin with by choosing a location that could never accommodate a massive industrial building, no matter how much fine-tuning was done, the Town conveyed the expectation that the approval process would be a perfunctory

step. The lack of apparent concern that the HDC would be a stumbling block in such a critical project displayed confidence that **the Town could pressure commissioners to nullify a state law one way or another. And in the end that is what happened.**

VI. THE FIREFIGHTERS' CONCERNS

Most cynical and corrupt of all was the way the Town used the pressing needs of the fire department to obscure the truth regarding the site selection process. The ostensible reason for breaking the rules when it came to the prized Historic District was the dire threat to public safety that the conditions at the current station pose. And yet, more than three years later the end is hardly in sight because a highly unsuitable site was chosen – supposedly for the great savings in time and money it represented. And who pays for the mess? The long-suffering firefighters. What they finally move into should be worthy of them.

VII. SUMMARY

The Town's entire marketing campaign was built upon the explicit promise that 139 TGR would save taxpayers a great deal of money and time. The claim was clearly fraudulent because that was never remotely possible at the chosen site, given its extraordinary drawbacks. If there were other feasible options, voters were entitled to know them before the vote and the Town Manager had a fiduciary duty to disclose them – not hide them.

AFTERWORD

While the Attorney General's Office conducts its inquiry, we will be distributing this material to representatives of the media. If it rouses the conscience of just one individual who then steps up and exposes the sordid saga it still might save a beautiful town with a prized past from making a terrible mistake – and maybe make other towns with historic districts more careful.

Notes:

- The segments that follow are no longer than they need to be to illustrate a pervasively illicit design and reinforce a pattern of abuse of trust and power. More supporting information and a full chronology can be found on *SaveOurBlock.org*.
- Mentions of “the Town” generally refer to the Town Manager, who was clearly behind the wheel.
- A copy of a letter sent to Select Board members will be attached at the end of this report. It was sent prior to the construction contract signing to alert Board members of this complaint to the Attorney General's Office that was initiated on April 7, 2025.

THE PROJECT BACKGROUND

“I am contacting the Public Integrity Unit to report corrupt practices that involve flagrant violations of the Commonwealth’s Open Meeting Law. Public Records Responses and other irrefutable documentation will fully back up the charges below.”

The Town of Bedford has been discussing and studying the need for a new fire station headquarters since the mid-1990s.

- In 1998, an expansion of the current station gave it a projected 10-15 years of functional life.
- In 2015, a study found that the station was inadequate for many pressing reasons and a 2018 study recommended building on a new site of at least 60,000 square feet.
- After considering various potential sites, the Select Board voted in November 2019 to include the purchase of 175 The Great Road, which would likely require eminent domain, on the March 2020 Town Meeting Warrant.
- In line with other town priorities, i.e., schools and planning/zoning, the cost of the project would customarily have been subordinated to its value to town residents.
- At the 2020 Annual Town Meeting (ATM), which was held outdoors in July 2020, due to COVID, the Select Board indefinitely delayed a number of capital projects, including the purchase of 175 The Great Road, the site of a TD Bank.
- The next month, at the Select Board’s August 2020 meeting to set the official goals for FY2021, the New Fire Station was identified as the Top Infrastructure Priority.
- That is the last time the project was discussed *or even mentioned* in Regular or Executive Sessions of the Select Board for the next 14 months. And it was 17 months before it appeared on the Regular Session meeting agenda!
- More than 18 months after the designated site for a new fire station was indefinitely postponed – the Town Manager’s office publicly announced that the Select Board had voted to put 139 The Great Road on the Annual Town Meeting Warrant.

There was no lawful reason to keep an ongoing site selection process secret. The Town Manager makes a report at every Select Board meeting and never mentioned that the Select Board had asked for a reevaluation of the site selection candidates. The public belonged in the planning loop – instead of being told out of the blue that a different property had been chosen. Especially when it sat at the gateway to the town’s historic district.

The entire process violated the Open Meeting Law. The public was given no chance to observe and assess the reasoning behind this policy decision. The only option voters

were given was to agree with it or leave the town's emergency responders in difficult circumstances.

That is just the beginning of the abnormalities and discrepancies in the process that broke the Open Meeting Law by defeating its statutory purpose. Private conversations apparently replaced public meetings. By whatever means the Town Manager communicated information regarding the reevaluation of other possible locations, there is no record that it resulted in Select Board deliberations!

The complete absence of supporting documentation to the Town's marketing narrative as outlined in the presentation points to a rogue strategy to deliberately manipulate the outcome of a public election. Sworn statements are the only way to determine the truth.

Interestingly, an excerpt from an email that Sarah Stanton sent to Town officials after a meeting with Webber Ave. neighbors when the TD Bank site was being proposed for the new fire station in March of 2020 includes a telling paragraph: "Many neighbors expressed disappointment on the lack of community process, public input, and discussion opportunity with the impacted neighbors. We did explain the legal process around executive session, but that was not well received."

The complaint that site selections were not being shared with residents as they have always been in the past seems to be specific to the Stanton tenure. And the blanket she threw over "the legal process around executive sessions" is definitely at odds with the requirements of the Open Meeting Law.

THE OFFICIAL TIMELINE AND PROMOTION

The Town's campaign to promote the purchase began with a Joint Meeting of the Finance and Capital Expenditure Committees on February 3, 2022. The PowerPoint presentation at the joint meeting was used at a number of official forums after that. The timeline notes the postponement of the article to purchase 175 The Great Road at the barebones 2020 Town Meeting and then jumps forward to the following four bullet points.

- Winter 2021 – Select Board requested staff to reevaluate sites, including historic and residential properties.
- Summer 2021 – Staff reached out to Utah State University, learned that they were preparing 139 The Great Road for sale.
- Summer/Fall 2021 – Due diligence with legal, design, public safety, and traffic consultants. Real estate negotiation with Utah State University.
- January 31, 2022 – Select Board votes to proceed with Purchase and Sale Agreement, contingent on Town Meeting vote.

The two committees gave their official recommendations prior to the vote based on information they accepted at face value. What they did not know is:

- Numerous Public Records Requests (PRR) produced not a single document or electronic record to substantiate the first bullet. How this request was conveyed to staff and any reports of progress to the Board do not appear in Select Board Regular and Executive Session minutes. There was no mention of the project or site re-evaluation *anywhere*. No wonder the public was surprised and confused by the selection.
- Record requests to the Town of Bedford for evidence of the summer of due diligence, did not reveal a single document or electronic record. The property at 139 The Great Road includes a 10- to 11-foot grade change going up the hill to the Town Center. But there was not even a soil percolation test done before the Select Board signed a Purchase and Sale Agreement.
- Records requests to both the Town and Utah State University could not substantiate the initial contact in the Summer of 2021. However, the October 25, 2021, Executive Session minutes report that: “Ms. Stanton asked for guidance from the Select Board for the next two weeks: should she contact the University of Utah to ascertain their interest, or continue pursuing eminent domain for 175 Great Road?”
- **If the initial contact with Utah State came in Summer 2021, and the Town learned that Utah State was planning to sell, why would Sarah Stanton need Select Board guidance on whether or not to ascertain their interest at the end of October?**
- Last February, I finally got confirmation in an email from a highly placed official at Utah State University that the first time they were contacted regarding the 139 TGR property was at the end of October 2021, which dovetails with the October 25th Select Board minutes.
- **The Town’s official timeline appears to have been concocted at the time of marketing the project to describe a false narrative. The implication that the negotiations started in the Summer and continued steadily into the fall is almost certainly not true. That, in itself, justifies an investigation.**

In The PowerPoint presentation to the Town Committees with an advisory role and throughout its marketing campaign, the Town promised to deliver:

- Savings of more than \$6 million in land acquisition, and 1–2 years (and construction cost savings) compared to eminent domain acquisition. The property is one (1) parcel meeting the 60,000 sq. ft. requirement.
- No negative impact on emergency response times. Appropriate site according to professional public safety and engineering experts. Public safety architect determined that grade and shape of site are sufficient. No concerns with grade.

- Traffic consultant determined site would be safe in terms of sightlines and stopping distance; potential improvements to nearby intersection will be evaluated.

The Town's entire marketing campaign was built upon the explicit promise that 139 would save a great deal of money over the TD Bank site

It was clearly fraudulent because that was never remotely possible at the chosen site given its unique and considerable drawbacks.

- Taken at face value, the savings in land acquisition between the two properties would not be determined until the eminent domain process for 175 TGR determined Fair Market Value.
- The "1–2 years (and construction cost savings) compared to eminent domain acquisition." was dishonest. The Historic District Commission's role was, under any circumstances, likely to take at least as long as eminent domain – which would probably have been granted as opposed to the HDC process which was always likely to fail – unless the statute was nullified (which is what happened.) **Glossing over the commission's mandate deprived voters of a prime consideration.**
- **These were two of the material facts that were misrepresented. It was a deliberate fantasy that steered a lot of voters (based on their comments at Town Meeting) to make a choice based on corrupted information.**
- **Beyond the equivalent investment of at least a year of up-front time required at both properties, the savings of time and money that a flat, square lot, with no slope to excavate, in a business district, with signalization, was plain to see.**

Throughout 2021, residents were left with the impression that the project to build at 175 The Great Road was still on hold. Then the sudden announcement that the Town was going to move forward with a different property two months before a vote to authorize the purchase caused a lot of concern. As did the shocking realization that it proposed to level a signature stretch at the entrance to the town's historic district.

THE SITE SELECTION

"In 2022, a property for the town's badly needed new fire station was approved by Town Meeting following a deceptive site selection process and fraudulent procurement process orchestrated by the Town Manager at the time. The people of Bedford were lied to, Town Committees were lied to, and Town Meeting was subverted."

At the core of all the controversy surrounding the station was the Town Manager's insistence that 175 and 139 The Great Road were the only feasible sites. That was not

credible on its face and no effort was ever made to demonstrate that it was credible – which would have been all that was needed to get many skeptics behind it.

In March of 2020 the Town put together a package of information for a public meeting to explain why the TD Bank site was chosen by the Select Board as the appropriate location for the new station: “Selectmen voted to consider two sites. Of the two sites, only one site was deemed feasible.”

At the same meeting residents were told that the Town had ruled out 139 Great Road as a possible location. How did it go from being eliminated in 2020 to being procured in 2022 by announcing to the world that “The Town has determined that this is a unique property and that therefore advertising concerning this acquisition will not benefit the Town's interest?”

At the Historic District Commission meeting on February 7, 2024, Commissioner Canciello, the architect on the Commission, said the following:

“And if there was a true study done, it would have made our job a lot easier if it said, this really is the only site that's feasible. I just wish that effort had been done before it got this far along that we had that kind of study with a professional planning firm actually doing that to ... consider everything from the acquisition cost, the zoning, all of the fire department, uh, needs all of those things factored in and have a matrix and say, here are the sites, which ones work, which ones don't work, and score them and know the pros and cons, **because it would have made our job not feeling like we have a gun to our head that if we don't approve of this, we're stopping the fire station.**”

If there truly were no other suitable properties, abiding by the Chapter 30B requirement to advertise for proposals at least once a week for two weeks instead of skirting it by voting to declare it a “unique acquisition” would have gone a long way toward reassuring residents that the contention was actually true.

If there were other feasible options, voters were entitled to know them before the vote and the Town Manager had a fiduciary duty to disclose them – not hide them.

After the Select Board members decided on the purchase of 139 The Great Road, Sarah Stanton told the Board that the staff would put together a document “for public consumption” to explain why other sites were removed from consideration.

In addition to the current station, the 12 sites on the map included at least three that would never be approved by residents – such as the Fitch Tavern, where the militia gathered for breakfast before marching to the Old North Bridge at the start of the American Revolution. That alone rendered the map unserious. At least three other

choices are integral to the beauty of the district. **Padding the site map and providing scanty and specious reasons for passing over many of the so-called candidates stripped the tool of any credibility.**

There were two sites on Loomis Street and one on North Road that should have been publicly vetted. One of the Loomis Street options was ideal from many standpoints, but the only comment on the interactive site map was: “Ruled out due to needing to acquire multiple parcels to meet square footage required.” The term “multiple” referred to two parcels and without contacting the owners there was no way to know whether or not acquisition would be difficult . **It appears that none of the map’s property owners were ever approached by the Town to ascertain possible interest before choosing to cannibalize the Historic District.**

As for 30 North Road, the Bedford Motel has always been considered by many townspeople to be the obvious choice for the new station – and which some members of the HDC thought was a much more suitable location for a fire station. Its location at the edge of the zone that “does not extend response time more than one minute in any direction”, includes 50% more square feet – most of it buildable – than the 139 TGR property, the valuation was reasonable, the grade is flat, construction and completion would be straightforward, it would fit into and enhance the surrounding area which is predominately commercial – and it would save a key block in the Bedford Center Historic District from being ruined. **But the owners, who in March 2022 indicated they would be open to discussion, were never approached by the Town.**

That property was also nominally in the Historic District because the contributing structure that was standing when the boundaries were established, was later deemed structurally unsound and condemned – leaving the motel that was built behind it in the 1950s within the district. The process of removing it from the district by a vote at Town Meeting would have no ill-effect on the Historic District, making it a vastly superior choice in delivering huge savings of time and money. But even though it was in the zone that would not alter response times by more than one minute,” the site map wrote it off with one sentence: “Ruled out due to not meeting response time requirements.” **That one fraudulent sentence was the basis for so much terrible waste.**

The intense promotion of the site resembled a high-pressure sales campaign much more than a municipal community process. Those who challenged the veracity of the claims were subjected to a smear campaign that bitterly divided the town and guaranteed that other dissenters would be intimidated. And yet, when the time came to vote there was no secret ballot and the article came within three switched votes of failing.

The terrible animosity and division that followed the narrow Town Meeting vote would have been avoided if those obvious issues surrounding the selection had been addressed by the

Town and aired beforehand. That would have been the natural and responsible thing for Town officials to do. The fact that they did not address the gaping anomalies in the site selection process revealed, in the minds of many, a rogue operation.

A clear-sighted comment that appeared in *The Bedford Citizen* soon after the 3/29/22 Town Meeting vote effectively exposed the fallacy of the Town's agenda:

"When it comes to the firehouse location, 139 Great Road is a historical building within the historical district. If the town is going to strong arm the HDC into demo'ing that building, they might as well abolish the HDC and deny any historical relevance of the town... but maybe that's the point.

"What's even worse is the fact that it's not even an ideal spot. Bedford Motel was not even broached by the town and all I kept hearing was 'response time'. What standard is this 'response time' and 'center of town' dictated on?

"If we really had issue with response time, why are we not talking about the elephant in the room that is East Bedford (takes 8 min) to get out there. There are 3 big apartment complexes, 2 preschools, a growing commercial community and a multitude of accidents between Rt 3, Rt 3/62 cloverleaf and Burlington Road.

"These all present potential medical emergencies taking resources to the other end of town. 'Response Time' cannot be applicable when talking about the difference between 139 Great and Bedford Motel and then be completely thrown out the window when discussing the whole East Bedford district.

"To the community: as a Bedford Firefighter of nearly 15 years, the outpouring of support was much appreciated prior to this vote and I'm sorry that the narrative was 'you have to vote YES if you truly support your first responders. That couldn't have been further from the truth as this community has always shown the BFD love and support and we are truly blessed to serve this community."

THE PRELIMINARY INJUNCTION HEARING AND COUNTER-OFFER

"Those lies were repeated before a Superior Court Justice at a Preliminary Injunction hearing, when the truth would have prevented three years of wasted funds and misplaced effort."

When the location was announced, many Bedford residents believed there could hardly be a more unsuitable site. But when the Moonans (former MA State Senator Carol Amick and her husband Bill Moonan,) whose home directly abuts 139 TGR, came out against the site for the new station, they were immediately branded in online discussions as selfish

profiteers. The fact that they were both devoted and respected Bedford volunteers and devotees of the town, and the Bedford Historic District in particular, wasn't an acceptable motive in the opinion of partisans who belligerently supported the Town's position.

Bill Moonan had professionally rehabbed numerous historic structures in Boston, was a three-term Selectman, a member of Bedford's Historic District Commission for nearly 40 years, and the one who envisioned and fought to create the town's municipal Town Center. If the allegations in this report are verified, it will become clear how much gratitude the people of Bedford owe to Carol and Bill. Because everything they did was for the benefit of the town.

When they led a body of 14 plaintiffs who challenged the Town in Superior Court for violating the Chapter 30B procurement statute, it could have saved the people from all of the wasted time, money, and heartache that followed. At the hearing on May 24, 2022, the judge was presented with the rationale by the Town Counsel that the "key issue" was that the Town's decision not to advertise was "a determination under the statute that is left to the discretion of the Select Board." The real key was why did the Board resist?

What was the basis for telling the judge that "advertising would not benefit the town?" What was the harm in making sure that the integrity of the Historic District had to be sacrificed? **Without a doubt, something that would have taken a mere couple of weeks and could have established (or repudiated) the dubious "uniqueness" claim would have been in the people's manifest best interests.**

The classic "whole truth" standard must apply to Officers of the Court. And yet, what is being revealed in this document shows that a selection of statements made by Town Counsel Nina Pickering-Cook were significantly misleading – with no opportunity provided for a rebuttal. The judge's order was influenced by statements, such as the following four, which were accepted at face value but were not truthful:

"Since then, the Town has done years of due diligence, **all of which have been public facing**. The Select Board only settled on 139 The Great Road after another potential acquisition at 175 The Great Road was essentially **rejected by the public** as too expensive at \$7.6 million, and the public **very clearly** was not a fan of the Town's proposed use of eminent domain."

"This left the Select Board with still another year or two gone by without a site for a new fire station, it was left with very few options. When the Utah State University offered the property meeting the size and location requirements to the Town with a price of only \$1.55 million and a voluntary acquisition, **the Town's needs were met then.**"

“So, for all these reasons, the Select Board decided that advertising was not going to help them in acquiring **this suitable site** for the Town. Now, in order to win this claim, as you mentioned earlier, Your Honor, the plaintiffs do have the burden here.”

“They have a burden to show that the decision not to advertise was arbitrary and capricious. To argue that a search that took place in public over the course of seven to eight years was arbitrary and capricious hardly passes the straight face test.” (A truly ironic choice of words.)

Finally, after the unsuccessful hearing, the Moonans made one last effort to rescue the process by making a counter-offer of \$1.7 million, hoping “to preserve the house, prevent its demolition, and place a legally binding historic preservation restriction on it.” If the Town had seen it as an opportunity to rethink the folly of the project and explore the option of the Bedford Motel, 175 TGR, or even had finally advertised to determine interest, the station would have had a fair chance of being close to occupancy today.

THE HISTORIC DISTRICT COMMISSION

“Furthermore, the agenda involved the nullification of the legislative Acts of 1964, which established one of the state’s oldest historic districts. A key property was wantonly targeted for destruction while other feasible sites went unexplored.”

A literal stone’s throw away from the sign on the cover, construction began on June 2nd. The trees are gone – to make way for a massive facility, out of proportion to everything else on the block.

A week before the March 2022 Town Meeting vote, the Town Manager told the Select Board:

“Town staff continue to field questions from residents regarding the proposed Fire Station land acquisition, relative to the historic value of 139 The Great Road.

“It is troubling to see the Historic District Commission (HDC) pre-judge a project which is not yet before them. HDC members continue to cite misinformation, share thoughts on other properties to be considered (an action outside their jurisdiction), and display outward and open hostility towards the overall project proposal.”

What a stunning comment for a Town Manager to make. It showed a total lack of respect for the fact that the Historic District Commissioners had a statutory duty to uphold. Questioning why a property that seemed well-suited to the Town’s needs was being ignored had a direct bearing on whether two contributing elements to the Historic District could be demolished.

If there was another feasible property, the words of the district's enabling Act would not allow the construction of an industrial facility so completely out of scale with its surroundings to be built. That is why the "exclusive acquisition" determination was required. An advertising response could have easily exposed how hollow that designation really was.

The Bedford Historic District, created by a Special Act of the Legislature in 1964, is a central part of the town's character. Any decision to degrade the district would arguably degrade the value of the town itself. Such a conflict of interest for the Select Board and Town Manager should have set a very high bar for the Town.

There should have been a well-informed public debate before entering into a Purchase and Sale agreement. Instead, every mention by the Town of the potential site mentioned the Historic District as an afterthought. **The statutory prohibition was never taken seriously.**

The Town's answer to any question regarding the HDC was: "As with any proposal in front of a Town committee, the HDC should not be pre-judging the merits of the project before it has been formally submitted."

But if it was prohibited by State law and a Town bylaw, they had a duty to challenge it!

Maneuvering the voters into approving the purchase and financing the design was the Town's strategy for forcing the Historic District Commission to nullify the law. It assumed that a "hardship" pleading would override a denial if need be. And if that didn't work, the upfront investment of time and money would force the commissioners to cave to public pressure.

Sure enough, after working with the design team for almost a year and a half, the HDC vote on January 3, 2024 denied the certificate of "appropriateness" that was required for a demolition permit in a 3-2 vote. And the Town responded a week later with a letter asking for reconsideration, claiming:

"The decision of the HDC imposes not only a substantial financial hardship to the Town, but more significantly, a clear disregard for the public welfare of all residents and non-residents that the Fire Department serves."

Whose fault was that? A reading of the law (or consultation with the HDC!) would have made it clear that the strategy ignored a passage that made the denial foreseeable:

"If the commission determines that the features, demolition or removal, sign or billboard involved will be appropriate or, although inappropriate, owing to conditions as aforesaid, failure to approve an application will involve substantial hardship to the applicant **and approval thereof may be made without substantial detriment or derogation** as aforesaid, the commission shall

approve the application; but if the commission does not so determine the application shall be disapproved."

The former Town Manager chose to ignore that passage and bet that the investment of time and money would exert enough pressure on the commissioners to swing the vote. So, it was no surprise that the January 3rd letter continued:

"The Select Board, the Fire Station Building Committee, PMA Consultants, Kaestle Boos Associates, Inc., and Town staff have invested significant time and financial resources into the success of this project, with thorough collaboration with the Historic District Commission."

By creating the "hardship" to begin with by choosing a location that could never accommodate a massive industrial building, no matter how much fine-tuning was done, the Town conveyed the expectation that the approval process would be a perfunctory step. **The lack of apparent concern that the HDC would be a stumbling block in such a critical project displayed confidence that the Town could pressure commissioners into nullifying a state law one way or another. And in the end that is what happened.**

The commissioner who made the sub-standard site selection remarks switched his vote when the demolition was reconsidered. There was nothing in his second vote that explained away the well-reasoned rationale for his first vote. But it seems likely that he thought an appeal would harm the town more than nullifying the law he was sworn to uphold.

THE FIREFIGHTERS' CONCERNS

Most cynical and corrupt of all was the way the Town used the pressing needs of the fire department to obscure the truth regarding the site selection process. The ostensible reason for breaking the rules when it came to the prized Historic District was the dire threat to public safety that the conditions at the current station pose. And yet, more than three years later, the end is hardly in sight because a highly unsuitable site was chosen – supposedly for the great savings in time and money it represented. And who pays for the mess? The long-suffering firefighters. What they finally move into should be worthy of them.

I have never once heard or read a complaint from the rank-and-file regarding the awful conditions. But what I did hear and read was the president of Bedford Professional Firefighters Local 2310 Lt. Mark Daly when he stood at a meeting of the Fire Station Building Committee with a score of firefighters in the hall and explained that the union members have "numerous concerns" about the feasibility of locating a new station at 139 The Great Road.

The meeting took place a few months after Sarah Stanton had moved into her office at Government Center, but it seems likely that at that time she still had her fingers in the pie and continued to stoke resistance to a true solution.

Lt. Daly went on to say, “We would be willing to stay at 55 The Great Road rather than build in the wrong location.” If only someone in Town government had taken that to heart. Why didn’t anyone give their input the respect it deserved? Why would he have made that offer if they didn’t want it to be taken seriously?

He also shared that firefighters worry that cost concerns may lead to reductions in interior functionality. And recently, the latest proof that it is a legitimate concern was when the entire basement was quietly removed from the plans – shortly after tests revealed major storm drainage problems. Why wasn’t that defect known from the beginning? How much of the \$2.3 million construction savings claims are based on that?

Lt. Daly concluded by saying that firefighters “have been used as pawns for this project since day one, and have not enjoyed watching townspeople argue with each other in our name.” Fans of the current agenda, inexplicably, preach about the importance of listening to the firefighters, but don’t seem to hear what those same firefighters are saying. They seem incapable of considering that a mistake may have been made and needs to be corrected – for the good of all.

There is one even darker side to the problem. While partisans spout that lives are in danger – which they insist can only be avoided by degrading the Historic District – what firefighters care about is reducing response time to underserved parts of the town. And that is something the Town has been deflecting year after year – while, *the real experts*, the first responders, respectfully bear witness to the need.

The subject keeps coming up from a wide contingent of firefighters because what they care passionately about is saving lives. At the 2022 Town Meeting one veteran firefighter pointed out that a substation serving northeast Bedford would at the same time improve response times for 50% of the town. But the Town’s rote, cavalier responses are totally lacking in imagination and deeply disturbing. Meanwhile, the current project will likely delay a substation’s vital EMS prospects by years – unless there is a radical change of minds.

SUMMARY

“Laws were broken and the voters of Bedford were cheated. If what I have laid out here can be substantiated, the project lacks a legal basis. It should be placed on hold pending an investigation into its legitimacy.”

The Town's entire marketing campaign was built upon the explicit promise that 139 TGR would save taxpayers a great deal of money and time. The claim was clearly fraudulent because that was never remotely possible at the chosen site, given its extraordinary drawbacks. If there were other feasible options, voters were entitled to know them before the vote and the Town Manager had a fiduciary duty to disclose them – not hide them.

The major drawbacks include:

- A lengthy design process required before the Town could apply to the HDC for a permit for demolition.
- The burying of wires and moving the poles in front of the site, which officials keep poo-pooing. But even after announcing it is in the works, not much changes; there was a tacit understanding at one time that it would be irresponsible to demolish the house or wall before this work is concluded.
- Massive excavation of the property as “much of the site is being ‘leveled out;’” according to the architect.
- And more recently, a complicated remedy for stormwater run-off problems is being implemented. Why that was not looked into during the due-diligence phase prior to the purchase has never been explained.

Sarah Stanton solemnly swore and affirmed that she would faithfully and impartially perform and discharge all the duties incumbent on her as Bedford's Town Manager, according to the laws of the Commonwealth and the bylaws of the Town.

She broke her Oath of Office to faithfully and impartially discharge her duties:

- When she ran a site selection process that routinely violated the Massachusetts Open Meeting Law and shut the townspeople out.
- When she misrepresented the fire department's deplorable conditions as dire to the public's health, used that as a pretext to warp the customary process, and fostered division with emotionally dishonest rhetoric.
- **When she misled the volunteer Select Board into violating the enabling Act and a Town bylaw by plundering a property they were duty-bound to protect.**
- When she dishonestly compared the costs of the TD Bank site with the 139 TGR property and insisted there were no other feasible options.
- When she devised a strategy that could only succeed if appointed members of the Historic District Commission (HDC) could be intimidated into violating their oaths of office by nullifying the mandates of a Legislative Act.

- When she made material misrepresentations and omissions to key Town Committees which were then factored into the Committees' 2022 Annual Town Meeting Warrant Recommendations.
- When she misapplied a declaration of uniqueness in the Central Register to undermine the municipal procurement process.
- When she promoted material misrepresentations and omissions to be made to Bedford residents by Town spokespersons in the campaign prior to Town Meeting.
- When she coached Town officials to make material misrepresentations and omissions at Town Meeting – which resulted in approving the purchase by only three votes.
- When she contributed to the Town's presentation before a Superior Court justice of material misrepresentations and omissions.
- When she vilified well-informed and well-meaning opponents to the plan and kept the Town's thumb on the scale to get it approved.

A Town Manager's value is in the talent, experience, and professionalism with which he or she guides a hardworking volunteer Select Board. But in Bedford, under Sarah Stanton's tenure, the Select Board took on an authoritarian tone that is exemplified in the Town's new fire station agenda. The Select Board Handbook's ethical requirement to "represent the entire community at all times" was abrogated. A stridently partisan scheme left the badly wounded community to deal with an exorbitantly expensive project that makes no sense. And that was the inevitable result of the unlawful actions that are chronicled here.

AFTERWORD

I trust that a thorough investigation by the Attorney General's Office will confirm that Sarah Stanton conspired to trick Bedford's voters and deprived Bedford's residents of their rights. While the White Collar and Public Integrity Division conducts its inquiry, we will be distributing this material to representatives of the media. If it rouses the conscience of just one individual who then steps up and exposes the sordid saga it could save a beautiful town with a prized past from a terrible mistake – and maybe make other towns with historic districts more careful.

Expediency should play no part in the current challenge and Town officials should refrain from making worst-case scenario forecasts of how long/expensive/difficult it would be to rectify the matter. Three misspent years and \$2 million cannot justify spending another \$38 million on a compromised facility that would disfigure the entrance to Bedford Center.

Because of Sarah Stanton's subterfuge, what is needed is a resident referendum. Without one, there is no way of knowing if the people who are paying for the station really support the current plan or would rather make a bold correction in course.

The current project is a compromise in the worst sense of the word. It is as wrong as wrong can be. It is indisputable that if 139 The Great Road had not become available something else would have been chosen and the station would be built. It only required using responsible, instead of arbitrary, criteria to make responsible, instead of arbitrary, policy decisions.

Ask the firefighters if they can stand adding a year, if necessary, to the current timetable and if they agree, let the people of Bedford come together in the Amish farmer tradition to identify the most feasible property or two, and, after getting the approval of the Fire Chief, hold a Special Town Meeting , and – with the assistance of the talented Kaestle Boos designers and the devoted Town Building Committee – RAISE A BARN!

Nickel-and-diming the new station is what ended up creating a monster. Be open to everything, bearing in mind what the firefighters' union members have asked for. If they believe the current station can be upgraded – and there have been some very creative ideas floated – then do what makes them happy. And give them the EMS substation they so fervently believe the town's residents need.

But don't count out the Bedford Motel until that is explored; advertise for hidden possibilities; and then vote for whatever makes the most sense. With 139 TGR so nearby, explore how it could be used in the interim to reduce some of the strain on the current station. No doubt Bill Moonan could help with that.

The centerpiece of the town's Historic District is the Old Meetinghouse. It is only standing today and is such a beauty because, after the original meetinghouse catastrophically burned down, the undaunted townspeople refused to cut corners and found the resourcefulness to build greatly – back when that was a lot harder to do.

Don't take the Bedford Center Historic District for granted. The town's charm is not the exclusive property of people who are here today but may be gone twenty years from now. They are stewards of those who worked hard to establish the district sixty years ago and who then passed it on – trusting that it would be cherished and guarded from depredation – so that those who live in and love Bedford a hundred years from now will find its beauty intact.



May 12 , 2025

The Town of Bedford Select Board
10 Mudge Way
Bedford, MA 01730

Dear Mr. Mortenson, Ms. Malone, Mr. Hanegan, Mr. Brosgol, and Mr. Parker:

As the Town of Bedford prepares to sign the fire station construction contract and demolish a key part of the Bedford Historic District, I want to share with the Select Board why the destruction of the Bacon property is not in the public interest.

On April 7th I submitted a “Request for Review” to the Public Integrity Unit of the Attorney General’s Office citing corrupt and deceptive practices. When I inquired into it on Thursday, I was told it is open – and I would expect that Sarah Stanton’s position in state government makes it imperative to determine whether or not these charges are true.

I have facts that support allegations that the people of Bedford were lied to, Town Committees that were charged with recommending the purchase were lied to, and therefore, Town Meeting was subverted. And still – after an incredibly aggressive and misleading campaign by Town officials – the article came within a mere three votes of failing. And then, those lies were repeated before a Superior Court Justice, when the truth could have prevented three years of wasted funds and misplaced effort.

The entire multi-million-dollar fiasco appears to be the result of one headstrong and unprincipled official who wanted to put a feather in her cap and had contempt for the people she served. I will not repeat my reasons here for believing that she committed fraud. An updated version of what has been uncovered will be posted this week on SaveOurBlock.org.

I now have written proof from Utah State University that elements of the Town’s PowerPoint presentation to the Finance and CapEx Committees on February 3, 2022, were fabricated – and then repeated throughout the Town’s campaign to sway voters.

I am very aware that many dedicated individuals have poured their hearts into the effort to make the best of a bad situation. At the same time, I have been researching the tainted process and have kept the Board and other officials informed of the results of my work, and yet no one has come forward to refute the allegations or explain why, if true, they don’t matter. In other words, you are forcing a \$40 million dollar project on land with a clouded title.

Asking an AI bot last week for its opinion on the legitimacy of an election that is based on false information from officials provided this answer: *An election based on false information from officials is inherently compromised. Legitimacy depends on voters making informed choices, and deliberate misinformation undermines that foundation. If officials spread falsehoods about candidates, voting processes, or outcomes, it erodes trust and distorts the will of the electorate.*

But none of us needs a bot to tell us that. The question is: If the evidence of malfeasance and fraud can be substantiated, what is the project's legal or ethical basis? Should the Town be signing a \$23 million contract before there is an investigation into the project's legitimacy? Everything, and I mean everything, in the record points to a deliberate effort on Sarah Stanton's part to trick residents into approving the purchase – knowing that if approved the momentum would be almost impossible to stop. So where is the legitimate authority to proceed?

Sarah Stanton seems to have bet that the HDC could be strong-armed and that even if three commissioners did not cave in to the pressure, residents would be so sick of the controversy that nothing would stop the runaway train. And she seems to have won.

It may be that the townspeople would support going forward anyway – even in the face of malfeasance and fraud. But the decision – after being given all the facts – should be theirs, not yours. If an independent investigation finds that the voters were manipulated into undermining the democratic process by the Town Manager, what could justify going forward with the project short of a town referendum?

The waste of time is staggering, but the accountability falls on Sarah Stanton, and to a lesser degree those who ignored the warnings of malfeasance. If 139 The Great Road truly had been the only option there would have been few objections. But that was absurd, and all one has to do is read poor Chief Grunes' body language in videos as he tried to support that nonsense. He was clearly in a very uncomfortable spot between a rock and a hard place.

I bet a good many firefighters would not agree even now that moving ahead with the compromised facility is the right call for anybody. And since they are the compelling reason for the sense of urgency, why not poll them by secret ballot and find out what they really think of all of this? The sad waste of time has been toughest on them, but in the long-term this is worth doing right.

What if simply advertising a Request for Interest resulted in some alternate sites that meet the criteria and would be far less complex and expensive to develop? Wouldn't most people want to know if the town has real options before destroying a gracious part of a historic block?

It may be wishful thinking but there is still a chance that the property all dressed up for the town's bicentennial in the picture below will be rehabilitated and dressed up for Bedford's 300th anniversary. Maybe with a "Bedford Historical Society" sign swaying in the breeze of the red maple tree and Town offices, or even MBTA rental dwellings, tucked in behind the house. And a fitting BFD Headquarters located where its design doesn't require unfortunate compromises.

This property belongs in the Historic District – and the out-of-scale, generic facility you are planning never would. It would inevitably corrupt and degrade the district that Mrs. Brown, my mother, and others worked so hard to establish sixty years ago to protect the home of The Bedford Flag from times when a false sense of urgency threatens to overcome good sense.

I recently watched *The Bonfire of the Vanities*, a movie that was only worth watching for the end, when Judge Leonard White tells the out-of-control courtroom spectators who don't like his ruling

what justice is. "Justice is the law, and the law is man's feeble attempt to set down the principles of decency. Decency! And decency is not a deal. It isn't an angle, or a contract, or a hustle! Decency... decency is what your grandmother taught you. It's in your bones! Now you go home. Go home and be decent people. Be decent."



It has been a heartbreaking three years for me – and for many others. But whether Bedford is in for a Win/Win or a Lose/Lose, I will be comforted by knowing that I did all I could to set the record straight.

Sincere best wishes,

Margaret Donovan

Margaret Donovan

Copies to:

Matthew J. Hanson, Town Manager | Chief James Bailey | Captain Mark Sullivan |
Captain Scott Ricker | Captain John Daniels | Lieutenant Mark Daly | Fire Station Building
Committee Members | Bedford Historic District Commissioners
Teri Morrow, Executive Director, *The Bedford Citizen*