The City *of* Worcester

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GoVenture Capital, LLC
c/o Benjamin Associates, LLC
155 Federal Street, Suite 700
Boston, MA 02110

**RE: Optiline Enterprises, LLC – 274 Franklin Street**

To whom it may concern,

As you know, the Fair Labor Division of the Massachusetts Attorney General's Office issued a Citation #24-02-140593-001 against Optiline Enterprises, LLC ("Optiline") resulting in the City of Worcester ("City") issuing a determination in June 2025 that any Tax Increment Financing (TIF) or Tax Increment Exemption (TIE) project would be in breach of their TIF/TIE Agreement if Optiline were hired to perform work on the project.

Subsequently, after receiving an agreement from Optiline's attorney dated January 5, 2026, between the Massachusetts Attorney General's Office and Optiline relative to said citation ("Settlement"), the City issued a determination that Citation #24-02-140593-001 was no longer a basis for determining that hiring Optiline would constitute a breach of the TIE Agreement for the project at 274 Franklin Street. Since then, the City has spoken with the Attorney General's Office and has received clarification as to the citation and related Settlement.

Section (c)(18) of the City's Responsible Development Ordinance states, "The applicant must ensure that all contractors and sub-contractors have not within the past three years been found in violation of any law applicable to its contracting business, including, but not limited to, licensing laws, tax laws, prompt payment law, wage and hour laws, prevailing wage laws, environmental laws, or others." The City's Responsible Development Ordinance is appended to any TIF or TIE Agreement that enables local property tax savings to applicable private development projects, such as the one on Franklin Street.

The citation by the Attorney General's Office was issued after "An investigation by the Fair Labor Division" and is related to a violation of M.G.L. ch. 149 § 148A to wit: Retaliatory action taken against an employee for making complaint under c. 149[1]. The Attorney General determined that Optiline took such retaliatory action with specific intent and issued the maximum penalty allowed under G.L. c. 149, Section 27C.

On January 6, 2026, the Attorney General's Office issued an amended citation reducing the civil penalty to $7,500.00. The Agreement contains provisions that it "shall not bind any other private or governmental entity, including, but not limited to...nor release the Company from liability for any other conduct not identified or described in the citation..." and "The Attorney General will amend the citation to reduce the penalty to $7,500.00

[1] Section 148A states: Any employer who discharges or in any other manner discriminates against any employee because such employee has made a complaint to the attorney general or any other person, or assists the attorney general in any investigation under this chapter, or has instituted, or caused to be instituted any proceeding under or related to this chapter, or has testified or is about to testify in any such proceedings, shall have violated this section and shall be punished or shall be subject to a civil citation or order as provided in section 27C.

and issue the amended citation to [Optiline]. In all other respects, the citation will remain as originally issued." In other words, the Attorney General's underlying finding that Optiline violated the law is undisturbed.

The City of Worcester hereby reaffirms its June 2025 decision and finds that the citation issued to Optiline in December 2024 violates the City's Responsible Developer Ordinance, rendering Optiline ineligible to work on tax relief projects in the city.

Sincerely,

Alexandra H. Kalkounis
City Solicitor

Cc: Eric D. Batista, City Manager
Peter Dunn, Chief Development Officer