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November 12, 2025

Robert Cappucci
Cappucci Committee
159 Cottage Street, #9
East Boston, MA 02128

Re: CPF-25-64

Dear Mr. Cappucci:

This office has completed its review of certain activity related to your 2025 campaign for Mayor of Boston. Based on our review, and for the reasons that follow, OCPF has determined that expenditures that were made outside of the depository bank account did not comply with the campaign finance law, M.G.L. c. 55.

1. Disclosure of External Activity

As a candidate for Mayor of Boston, you and the Cappucci Committee ("the Committee") were required to designate a financial institution as the Committee's depository bank. See M.G.L. c. 55, § 19. The campaign finance law states that, for those candidates and committees required to designate a depository bank, all campaign finance activity, including expenditures made using the candidate's own funds, must flow through the designated depository account and be disclosed in a timely manner. See M.G.L. c. 55, § 19(c).

In conversations with OCPF, you stated that you had spent personal funds totaling \$8,500 to make campaign expenditures, prior to organizing the Committee with OCPF and opening the Committee's depository account. Because expenditures in excess of \$100 were transacted outside the depository account, such transactions were made in a manner not consistent with the requirements of M.G.L. c. 55, § 19, as described above. Even candidates who "self-fund" their campaigns, however, must designate a depository bank and make all expenditures from that account. This requirement applies regardless of the amount of expenditures made. For this system to work and for disclosure to take place in a timely manner, all funds, including personal funds to be used for a campaign, must be deposited into the depository bank before they are used.



To resolve this matter, the Committee filed an external activity report on July 23, 2025, listing your personal expenditures as candidate contributions to the Committee. Although you had intended to report these expenditures as candidate loans to the Committee, you agreed to reflect these expenditures as contributions.

2. Subvendor Disclosure

M.G.L. c. 55, § 18D requires a vendor who receives \$5,000 or more during a calendar year from a political committee to provide the committee with a detailed account of all expenditures of \$500 or more that the vendor, on behalf of the committee, made to subvendors who provided goods or services. If subvendors are utilized, then a committee must e-file subvendor reports based on the information provided to the committee by vendors. A subvendor report must be filed by the fifth of each month to cover the previous month.

During conversations with OCPF staff regarding the external activity, OCPF requested the Committee file subvendor reports that corresponded to these expenditures. On July 24, 2025, the Committee filed the required subvendor report which reflected that Paladin Petitions LLC made subvendor payments in the total amount of \$4,564.50 for signature collection services.

Although the activity described herein was not consistent with the requirements of the campaign finance law, OCPF notes that you fully cooperated with this review and all activity has since been disclosed. As a result, no further action is required and this matter may now be closed. We anticipate that the guidance provided during the course of this review will result in future compliance with the campaign finance law. However, further instances of noncompliance with the campaign finance law may result in referral to the Attorney General in accordance with Section 3 of the campaign finance law. Additionally, the failure to file a campaign finance report in the future may result in OCPF initiating legal proceedings that could prevent your name from appearing on a state or local ballot in Massachusetts. See M.G.L. c. 55, § 3.

In accordance with the opinion of the Supervisor of Public Records, this letter is a public record. As such, it will be placed in the Committee's public file. If you have any questions regarding this or any other campaign finance matter, do not hesitate to contact this office.

Sincerely,



William C. Campbell
Director

WCC/db
cc: Paul Leone, Treasurer