



WILLIAM C. CAMPBELL
DIRECTOR

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CAMPAIGN & POLITICAL FINANCE

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November 17, 2022

Gregory Antonelli
c/o Terrence Kennedy, Esq.
512 Broadway
Everett, MA 02149

Re: CPF 21-163

Dear Mr. Antonelli:

This office has completed its review of certain contributions made to the Carlo DeMaria Committee (the "Committee").

During OCPF's review, you confirmed that you used personal funds to make a contribution to the Committee, in the amount of \$1,000, in November 2021. You also acknowledged that, at the same time you made the contribution to the Committee, you asked two other family members to make additional contributions to the Committee, in the amount of \$1,000 each. You subsequently provided cash from your personal account to each family member to reimburse them for the contributions made in their names to the Committee.

M.G.L. c. 55, § 10 prohibits any person from making political contributions in the name of another person for the purpose of disguising the true origin of the contribution. Based on our review, this office has determined that your actions in reimbursing family members for political contributions made in the family members' names violated Section 10 of the campaign finance law.

By making a personal contribution to the Committee in the amount of \$1,000, and then reimbursing two other individuals for the political contributions made in their names in the amount of \$1,000 each, you actually made three contributions to the Committee, totaling \$3,000. Two of those contributions, totaling \$2,000, were excess contributions that did not comply with Section 7A of the campaign finance law, which limits individual contributions to Massachusetts candidates to \$1,000 per candidate, per calendar year.

OCPF believes that the Committee had no knowledge that the contributions were reimbursed by another until it was so notified during OCPF's review. The contributions were made using checks drawn on the personal checking accounts of the named contributors. It would have appeared to the Committee, absent other information, that the contributions were, in fact, from those individuals. The Committee has agreed to disgorge \$2,000, which represents the total amount of prohibited contributions the Committee received from contributors referenced in this letter. The disgorgement will be made in a manner consistent with the residual funds clause of M.G.L. c. 55, § 18, no later than December 15, 2022.

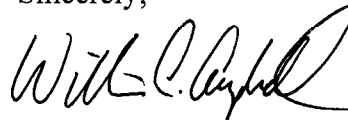


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To resolve this matter, you have made a payment to the Commonwealth in the amount of \$6,000. Because OCPF believes that the guidance provided during the course of this review will ensure future compliance with the campaign finance law, this matter may be closed at this time.

In accordance with the opinion of the Supervisor of Public Records, this letter is a matter of public record.

Sincerely,

A handwritten signature in black ink, appearing to read "William C. Campbell". The signature is fluid and cursive, with a large, stylized initial "W".

William C. Campbell
Director

WCC/sh