

**DISCLOSURE BY NON-ELECTED STATE EMPLOYEE OF FINANCIAL INTEREST
AND DETERMINATION BY APPOINTING AUTHORITY
AS REQUIRED BY G. L. c. 268A, § 6**

	STATE EMPLOYEE INFORMATION
Name:	Tom Caputo
Title or Position:	SCIO
State Agency:	EOED
Agency Address:	1 Ashburton Place, Room 2101 Boston, MA 02108
Office Phone:	(617) 820-8336
Office E-mail:	tom.caputo@mass.gov
	My duties require me to participate in a particular matter, and I may not participate because of a financial interest that I am disclosing here. I request a determination from my appointing authority about how I should proceed.
	PARTICULAR MATTER
Particular matter E.g., a judicial or other proceeding, application, submission, request for a ruling or other determination, contract, claim, controversy, charge, accusation, arrest, decision, determination, or finding.	In my role as EOED CIO, I am helping to explore a potential partnership with Cyvl, a Somerville-based AI startup. The company provides an infrastructure intelligence platform that uses AI, LiDAR, and 360° imagery to help governments assess, map, and manage roads, sidewalks, and related public infrastructure assets.
Your required participation in the particular matter: E.g., approval, disapproval, decision, recommendation, rendering advice, investigation, other.	As EOED SCIO, I am uniquely well positioned to assess Cyvl's technology and determine how best to structure a potential vendor or partner relationship between the company and the Commonwealth. I can evaluate both its AI-related capabilities and its potential to generate economic benefits for Massachusetts. Any vendor relationship with Cyvl would likely proceed through the standard public procurement process, in which I would serve as an evaluator.
	FINANCIAL INTEREST IN THE PARTICULAR MATTER
Write an X by all that apply.	☒ I have a financial interest in the matter. ☐ My immediate family member has a financial interest in the matter. ☐ My business partner has a financial interest in the matter. ☐ I am an officer, director, trustee, partner or employee of a business organization, and the business organization has a financial interest in the matter. ☐ I am negotiating or have made an arrangement concerning future employment with a person or organization, and the person or organization has a financial interest in the matter.

Financial interest in the matter	As an early-stage start-up, Cyvl is venture capital funded. One of their investors is Companyon Ventures. I have personally invested \$50,000 as a general partner in recent Companyon funds. Companyon has roughly \$200 million under management. I also serve as a "venture partner" advisor to Companyon Ventures.
Employee signature:	
Date:	6/2/2026

DETERMINATION BY APPOINTING OFFICIAL

	APPOINTING AUTHORITY INFORMATION
Name of Appointing Authority:	Eric Paley
Title or Position:	Secretary
Agency/Department:	Executive Office of Economic Development
Agency Address:	1 Ashburton Place, Room 2101 Boston, MA 02108
Office Phone:	(617) 788-3605
Office E-mail	epaley@mass.gov
	DETERMINATION
Determination by appointing authority: Write an X by your selection.	As appointing official, as required by G.L. c. 268A, § 6, I have reviewed the particular matter and the financial interest identified above by a state employee. ☐ I am assigning the particular matter to another employee, or ☐ I am assuming responsibility for the particular matter, or ☒ I have determined that the financial interest is not so substantial as to be deemed likely to affect the integrity of the services which the Commonwealth may expect from the employee.
Appointing Authority signature:	
Date:	June 6, 2026
Comment:	

Attach additional pages if necessary.

File copy with:

State Ethics Commission, One Ashburton Place, Room 619, Boston, MA 02108