



STATE OF CALIFORNIA
FAIR POLITICAL PRACTICES COMMISSION
1102 Q Street • Suite 3050 • Sacramento, CA 95811

July 9, 2026

Deb Kahookele for Long Beach City Council 2026

Debra Kahookele

Via email: info@debforlongbeach.com & [REDACTED]

No Action Closure Letter re FPPC Nos. 2024-00948 & 2025-01255; Deb Kahookele for Long Beach City Council 2026 & Debra Kahookele

Dear Respondents:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the “Act”).¹ This letter is in response to two sworn complaints alleging violations of campaign disclosure provisions and advertisement disclaimer provisions of the Act.

Under the Act, an advertisement means any general or public communication that is authorized and paid for by a committee as defined in section 82013 for the purpose of supporting or opposing a candidate or candidates for elective office or a ballot measure or ballot measures.²

If a committee creates, originally publishes, or distributes a qualified political advertisement using artificial intelligence, a disclosure is required.³ Media is considered “generated or substantially altered using artificial intelligence” if either of the following conditions are met: (i) the media is entirely created using artificial intelligence and would falsely appear to a reasonable person to be authentic; or (ii) the content is materially altered by artificial intelligence such that the alteration would cause a reasonable person to have a fundamentally different understanding of the media when compared to an unaltered version.⁴ Media is not considered “generated or substantially altered using artificial intelligence” where any changes are immaterial, such as cosmetic adjustments, color edits, cropping, or resizing.⁵

Furthermore, the Act requires campaign statements to include the total amount of expenditures made during the period covered by the campaign statement to persons who received \$100 or more and must include the person’s full name, street address, the amount of the expenditure, and a brief description of the expenditure.⁶

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in sections 18104 through 18998 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Section 84501, subd. (a)(1).

³ Section 84514, subd. (a)(1).

⁴ Section 84514, subd. (d).

⁵ Section 84514, subd. (d)(2)(ii).

⁶ Section 84211, subds. (i)&(k).

The complaint alleged that a video posted on social media in 2024 did not include proper advertisement disclaimers. However, the Committee did not qualify until April 3, 2025, and was not required to include disclaimers prior to qualification. Additionally, candidate-controlled committees are not required to include disclaimers on videos. Furthermore, the video at issue was not found to have been posted on any social media site during the investigation.

An additional complaint alleged that advertisements produced in 2025 failed to include proper disclaimers. However, the advertisements in question do not require general disclaimers for candidate-controlled committees under the Act. Moreover, while the videos and images may have been materially altered, they would not cause a reasonable person to have a fundamentally different understanding of the media. Accordingly, no artificial intelligence disclosures were required.

Lastly, a review of the Committee's campaign statements indicates that campaign expenditures were properly and timely disclosed. Accordingly, no violations are being pursued.

Therefore, there is insufficient evidence to establish a violation under the Act. Accordingly, we are closing this matter without further action

If you have questions at a later date, please visit our website at <http://www.fppc.ca.gov/advice.html>. If you have further questions, you can have your questions answered by experienced staff, either by emailing advice@fppc.ca.gov or by calling 1-866-ASK-FPPC (1-866-275-3772). Telephone advice is available Monday through Thursday from 9:00 a.m. to 11:30 a.m.

If you have any questions regarding this letter, please contact me at LColumbel@fppc.ca.gov or (279) 237-5974.

Sincerely,

Laura Columbel

Laura Columbel
Senior Commission Counsel
Enforcement Division

cc: Rich (Lee) Charley