

CAMPAIGN SPENDING COMMISSION

STATE OF HAWAI'I

IN RE THE MATTER OF

SYLVIA LUKE, MICHAEL LUKE,
EMMANUEL ZIBAKALAM, LEODOLOFF R.
ASUNCION JR., KALOWENA KOMEIJI,
MATTHEW W. SASAKI, and FRIENDS OF
SYLVIA LUKE,

Respondents.

DOCKET NO. 26-05

COMPLAINT; EXHIBITS 1-62;
CERTIFICATE OF SERVICE

COMPLAINT

Comes now the Executive Director of the Campaign Spending Commission (“Commission”) Kristin E. Izumi-Nitao, pursuant to Hawaii Revised Statutes (“HRS”) §11-402(b), hereby files this Complaint against Respondents Sylvia Luke (“Respondent Luke”), Michael Luke (“Respondent Michael Luke”), Emmanuel Zibakalam (“Respondent Zibakalam”), Leodoloff R. Asuncion Jr. (“Respondent Asuncion Jr.”), Kalowena Komeiji (“Respondent Komeiji”), Matthew W. Sasaki (“Respondent Sasaki”), and Friends of Sylvia Luke (“Respondent Friends”) (collectively, “Respondents”). The undersigned alleges as follows:

1. Respondent Luke is the 16th and current Lieutenant Governor of Hawai‘i.¹ Respondent Luke was elected to this office in 2022, with a term to expire on November 3, 2026.²
2. Prior to being elected to the Lieutenant Governor’s office, Respondent Luke was a member of the state House of Representatives, representing District 25 (previously District 26) on Oahu. Respondent Luke was first elected to the state House of Representatives in 1998,

¹ As of April 23, 2026, Respondent Luke took an indefinite, unpaid leave of absence from her duties as the Lieutenant Governor after it was reported that she received a target letter from the state Attorney General’s Special Investigations and Prosecution Division.

² Respondent Luke has not filed her nomination papers to run in the 2026 election. On April 19, 2026, she issued a public statement announcing that she does not intend to run in the 2026 Lieutenant Governor race.

where she remained until 2022. Respondent Luke served as the Chair of the House Finance Committee from 2013 to 2022. Representative Ty Cullen, who represented District 39 (previously District 41), was the Vice Chair of the House Finance Committee from 2017 to 2022.

3. On October 8, 2021, Ty Cullen was arrested by the Federal Bureau of Investigation (“FBI”) following their investigation into public corruption allegations involving public officials in Hawai‘i.³

4. Following his arrest, Ty Cullen became a cooperating asset of the FBI and provided information concerning his conduct and that of other public officials, including acceptance of bribes and monetary rewards for the performance of official acts on behalf of special interests by both himself, and other state legislators.

5. On January 20, 2022, Ty Cullen met with the subject of the FBI bribery investigation, along with an “influential state legislator” and recorded a conversation. During the meeting, the subject of the bribery investigation provided the “influential state legislator” with approximately \$35,000 in funds that were purportedly to be used in an existing campaign.

6. In February 2026, Respondent Luke gave a statement through various local media outlets, stating that she might be the “influential state legislator” referenced in the federal investigation, but denied taking \$35,000 from any individual. Respondent Luke acknowledged that she had dinner with Ty Cullen in January 2022 and admitted accepting a \$5,000 contribution check from Tobi Solidum and another \$5,000 contribution check from Kristen Pae.⁴

7. The relevant campaign finance reports covering the events that transpired as

³ Ty Cullen resigned from the House of Representatives in February 2022. He subsequently pled guilty to the federal honest services wire fraud charge and was sentenced to serve 24-months in federal prison on April 6, 2023.

⁴ Tobi Solidum is a lobbyist and businessman with known ties to Ty Cullen. Kristen Pae is Tobi Solidum’s adult stepdaughter. On April 22, 2026, it was reported that Tobi Solidum also received a target letter from the state Attorney General’s Special Investigations and Prosecution Division, along with Respondent Luke and Respondent Asuncion Jr..

described above cover the reporting period of July 1, 2021 to December 31, 2022. Therefore, the scope of this Complaint and the review conducted is limited to this reporting period.

8. In October 2021, Respondent Luke announced her candidacy for the 2022 election for the Lieutenant Governor’s office.⁵

9. Respondent Luke filed her nomination papers with the Office of Elections on June 7, 2022. EXHIBIT 1.

10. As Respondent Luke was a candidate running in the 2022 election for the Lieutenant Governor position, Respondent Luke was subject to the following campaign finance reporting period:

Report	Reporting Period	Date Report Due
Supplemental	July 1 – December 31, 2021	January 31, 2022
1B Preliminary Primary	January 1 – June 30, 2022	July 14, 2022
2 nd Preliminary Primary	July 1 – July 29, 2022	August 3, 2022
Late Contributions	July 30 – August 9, 2022	August 10, 2022
Final Primary	July 30 – August 13, 2022	September 2, 2022
1 st Preliminary General	August 14 – September 26, 2022	October 3, 2022
2 nd Preliminary General	September 27 – October 24, 2022	October 31, 2022
Late Contributions	October 25 – November 4, 2022	November 7, 2022
Final Election Period	October 25 – November 8, 2022	November 30, 2022
Supplemental	November 9 – December 31, 2022	January 31, 2023

11. Respondent Luke filed these campaign finance reports on time.

12. However, since filing these original campaign finance reports, Respondent Luke submitted the following number of amendments to each of the identified campaign finance reports:

Report	Reporting Period	Number of Amendments Filed
Supplemental	July 1 – December 31, 2021	3
1B Preliminary Primary	January 1 – June 30, 2022	6

⁵ The 2022 Lieutenant Governor race had a total of eleven (11) candidates who ran in the primary election: Respondent Luke, Keith Amemiya, Ikaika Anderson, Daniel Cunningham, Sherry Menor-McNamara, Sam Puletasi, Rob Burns, Tae Kim, Seaula Tupai, Charles Keoho, and Shaena Dela Cruz.

2 nd Preliminary Primary	July 1 – July 29, 2022	7
Final Primary	July 30 – August 13, 2022	7
1 st Preliminary General	August 14 – September 26, 2022	8
2 nd Preliminary General	September 27 – October 24, 2022	8
Final Election Period	October 25 – November 8, 2022	8
Supplemental	November 9 – December 31, 2022	8

13. Respondent Friends is Respondent Luke’s candidate committee. Respondent Friends filed its original organizational report with the Commission in the Candidate Filing System on January 18, 2007, which was subsequently amended eleven (11) times. Respondent Friends’ organizational report was last amended on May 23, 2023. EXHIBIT 2.

14. For the period between July 1, 2021 to December 31, 2022, Respondent Friends reported having one bank account with the American Savings Bank, an account ending in 7086 (hereinafter “ASB account”).

15. For the period between July 1, 2021 to December 31, 2022, Respondent Friends reported the following list of treasurers and deputy treasurers through its organizational reports filed with the Commission:

Date of the Organizational Report	Treasurer	Deputy Treasurer
January 22, 2007	Michael Luke	None
October 27, 2021	Emmanuel Zibakalam	None
November 1, 2021	Kalowena Komeiji	None
November 23, 2021	Leodoloff R. Asuncion Jr.	Kalowena Komeiji
May 23, 2023	Matthew W. Sasaki	None

16. Based on the organizational report filed on January 22, 2007, Respondent Michael Luke was the treasurer for Respondent Friends until the filing of the amended organizational report on October 27, 2021. Respondent Friends did not list any deputy treasurer during this time. EXHIBIT 3.

17. On December 11, 2006, Respondent Friends submitted a signed copy of the

candidate committee electronic filing form, which contained the following certification language (hereinafter “certification language”): “[b]y signing and submitting this form, the candidate and treasurer certify that the information on all ‘electronically filed’ reports and attached schedules is true and accurate.” This candidate committee electronic filing form was signed on December 7, 2006, by Respondent Luke, as the candidate, and by Respondent Michael Luke, as the treasurer.

EXHIBIT 4.

18. Respondent Friends never reported Respondent Luke to be its treasurer or a deputy treasurer.

19. From March 2021, up to and including October 2021, Respondent Luke signed off on payment checks from Respondent Friends’ ASB account, authorizing payments to be withdrawn from Respondent Friends’ ASB account. In total, Respondent Luke signed off on at least fourteen (14) payment checks. EXHIBIT 5.

20. From March 2021, up to and including October 2021, there was no reported death, resignation, or removal of Respondent Friends’ treasurer, who was Respondent Michael Luke.

21. On its amended organizational report filed on October 27, 2021, Respondent Friends replaced Michael Luke with Emmanuel Zibakalam as its new treasurer. Respondent Friends did not list any deputy treasurer. EXHIBIT 6.

22. On October 26, 2021, Respondent Friends submitted a signed copy of the candidate committee electronic filing form, which contains the following revised certification language (hereinafter “revised certification language”): “[b]y signing this form, the candidate and treasurer acknowledges and certifies that the information on all reports electronically filed online are true, complete, and accurate.” This candidate committee electronic filing form was

signed on October 25, 2021, by Respondent Luke, as the candidate, and by Respondent Zibakalam, as the treasurer. EXHIBIT 7.

23. On October 26, 2021, Respondent Luke submitted a signed letter to the ASB requesting the bank to “[p]lease remove signers: Michael K. H. Luke Sylvia Luke And Add: Emmanuel Zibakalam as the new treasurer[.]” EXHIBIT 8.

24. Effective October 26, 2021, Respondent Zibakalam became the sole signatory to Respondent Friends’ ASB account. EXHIBIT 9.

25. On its amended organizational report filed on November 1, 2021, Respondent Friends replaced Emmanuel Zibakalam with Kalowena Komeiji as its new treasurer. Respondent Friends did not list any deputy treasurer. EXHIBIT 10.

26. On November 1, 2021, Respondent Friends submitted a signed copy of the candidate committee electronic filing form containing the revised certification language, which was signed on November 1, 2021, by Respondent Luke, as the candidate, and by Respondent Komeiji, as the treasurer. EXHIBIT 11.

27. While not listed either as the treasurer or as a deputy treasurer with Respondent Friends, Respondent Zibakalam continued to remain the sole signatory to Respondent Friends’ ASB account, up until November 9, 2022.

28. From November 6, 2021, up to and including November 9, 2022, Respondent Zibakalam signed off on payment checks from Respondent Friends’ ASB account, authorizing payments to be withdrawn from Respondent Friends’ ASB account. In total, Respondent Zibakalam signed at least two hundred and sixteen (216) payment checks. EXHIBIT 12.

29. From November 2021 to November 2022, Respondent Friends paid eleven (11)

monthly installments in the amount of \$3,000 to Respondent Zibakalam, categorized as “contract, employee & professional services.”⁶ In total, Respondent Friends paid \$33,000 to Respondent Zibakalam. All these checks were signed by Respondent Zibakalam. EXHIBIT 13.

30. On its amended organizational report filed on November 23, 2021, Respondent Friends replaced Kalowena Komeiji with Leodoloff R. Asuncion Jr. as its new treasurer. Kalowena Komeiji became the deputy treasurer. EXHIBIT 14.

31. On November 22, 2021, Respondent Friends submitted a signed copy of the candidate committee electronic filing form containing the revised certification language, which was signed on November 22, 2021, by Respondent Luke, as the candidate, and by Respondent Asuncion Jr., as the treasurer. EXHIBIT 15.

32. On November 9, 2022, Respondent Zibakalam submitted a signed letter to ASB requesting the bank to “[p]lease add a new signer, Nelisa K Asato, to account[.]” EXHIBIT 16.

33. As of November 9, 2022, Respondent Friends’ ASB account listed two (2) individuals, Emmanuel Zibakalam and Nelisa Asato, as their signatories to the ASB account. EXHIBIT 17.

34. From November 9, 2022, to the present day, Respondent Friends never reported Emmanuel Zibakalam or Nelisa Asato to be its treasurer or a deputy treasurer.

35. On November 9, 2022, the reported treasurer for Respondent Friends was Leodoloff R. Asuncion Jr., and the deputy treasurer was Kalowena Komeiji. EXHIBIT 14.

36. In November 2022, Nelisa Asato signed off on payment checks from Respondent

⁶ Although Respondent Friends reported a total of twelve (12) \$3,000 stipend payment checks to Respondent Zibakalam through its campaign finance reports, the bank records only showed eleven (11) stipend payment checks cashed by Respondent Zibakalam.

Friends' ASB account, authorizing payments to be withdrawn from Respondent Friends' ASB account. In total, Nelisa Asato signed off on at least two (2) payment checks. EXHIBIT 18.

37. On its amended organizational report filed on May 23, 2023, Respondent Friends replaced Leodoloff R. Asuncion Jr. with Matthew W. Sasaki as its new treasurer. Respondent Friends did not list any deputy treasurer. EXHIBIT 19.

38. Respondent Friends also submitted a signed copy of the candidate committee electronic filing form containing the revised certification language, which was signed on May 19, 2023, by Respondent Luke, as the candidate, and signed on April 26, 2023, by Respondent Sasaki, as the treasurer. EXHIBIT 20.

39. Prior to the 2022 primary election, Respondent Luke informed the Commission staff that she wanted to audit her campaign records in preparation for running for Lieutenant Governor.

40. On February 17, 2022, Respondents escheated \$25,100 to the Hawaii Election Campaign Fund ("HECF"). The memo section of this check notes "CSC."⁷ EXHIBIT 21.

41. On March 10, 2022, Respondents escheated \$3,694.87 to the HECF. The memo section of this check notes "Adjustment." It was represented to the Commission staff that this was the unreconcilable amount between the candidate committee's bank account and the reported cash on hand in the candidate filing system. EXHIBIT 22.

42. On March 10, 2022, Respondents escheated \$500 to the HECF. The memo

⁷ This escheat was referenced in Respondent Luke's written statement posted on her campaign website as: "15 contributions from Choy, his family, and his business associates, totaling \$25,000 and made between November 3, 2014 and March 1, 2019, were sent to the Campaign Spending Commission." EXHIBIT 26.

section of this check notes “cycle overage.” It was represented to the Commission staff that this was excess funds from Martin Kao.⁸ EXHIBIT 23.

43. On July 29, 2022, Respondents escheated \$1,000 to the HECF. This was a self-reported excess contribution and it was represented to the Commission staff that this was an excess contribution from “UHPA PAC.”⁹ EXHIBIT 24.

44. On February 18, 2026, the Commission received an escheat check of \$5,000 from Respondent Friends with the memo for “Donation to HECF – K. Pae.”¹⁰ EXHIBIT 25.

45. The Commission staff informed Respondent Friends that the Commission would not be depositing the check at this time, as her campaign finance reports were under review by the Commission.

46. On February 19, 2026, Respondent Luke issued a written statement through her campaign website stating: “[t]his month, I was made aware of that those refunds [to Tobi Solidum and Kristen Pae] appeared in the campaign spending reports but the original contributions did not. . . as the candidate on the ballot, I take full responsibility for any errors.” Respondent Luke further stated that she hired a professional campaign finance compliance firm to run an audit of her past reports and to ensure complete accuracy of her campaign finance reports. EXHIBIT 26.

47. On May 21, 2026, the Commission staff sent Respondents a copy of the Complaint and set the matter on the June 24, 2026 Campaign Spending Commission Agenda.

⁸ Martin Kao was the president and CEO of Navatek LLC, a Hawai‘i-based engineering firm that received contracts from the U.S. Defense Department, who was convicted in 2025 for illegal campaign contributions to a U.S. Senator Susan Collins from Maine. See Nick Grube, *Former Hawai‘i Defense Contractor Gets Prison Time For Illegal Donations*, Civil Beat (Oct. 20, 2025), <https://www.civilbeat.org/2025/10/former-hawai%CA%BBi-defense-contractor-gets-prison-time-for-illegal-donations/>.

⁹ UHPA PAC is an abbreviation for University of Hawaii Professional Assembly – PAC, which is a registered noncandidate committee with the Commission.

¹⁰ This payment check from Respondent Friends’ ASB account was signed by Nelisa Asato, who was never reported to be a treasurer or a deputy treasurer of Respondent Friends.

48. Pursuant to HRS §11-403(c), if Respondents fail to explain or otherwise respond to the Complaint within thirty days from the mailing of the Complaint, the Commission may treat the failure to explain or respond as a rebuttable presumption that a violation has occurred.

49. The Commission has jurisdiction in this proceeding pursuant to HRS §§11-314 and 11-401 to 11-412.

50. Under HRS §11-404, “[t]he commission shall promptly determine, without regard to chapter 91, to:

- (1) Summarily dismiss the complaint;
- (2) Investigate further;
- (3) Make a preliminary determination; or
- (4) Refer the complaint to an appropriate prosecuting attorney for prosecution under section 11-411.”

51. HRS §11-410(a) provides:

“The commission may make a decision or issue an order affecting any person violating any provision of this part that may provide for the assessment of an administrative fine as follows:

- (1) If a person other than the person described in paragraph (2), an amount not to exceed \$1,000 for each occurrence or an amount not to exceed three times the amount of an unlawful contribution or expenditure[.]”

52. Pursuant to HRS §11-410(a) and Hawaii Administrative Rules (“HAR”) §3-160-73(a), the Commission has adopted a Schedule of Fines for violations of the Campaign Finance Law and rules.

53. HRS §11-411 provides: “In addition to an administrative determination that a violation of this part has been committed, the commission may refer the complaint to the attorney general or county prosecutor at any time the commission believes the respondent may have recklessly, knowingly, or intentionally committed a violation.”

COUNT I

**UNAUTHORIZED HANDLING OF CAMPAIGN FUNDS
(Violation of HRS §11-324(d))**

54. HRS §11-324 requires every candidate committee to appoint a treasurer on or before the day it files an organizational report.

55. Under HRS §11-302, candidate committee means “an organization, association, or individual that receives campaign funds, makes expenditures, or incurs financial obligations on behalf of a candidate with the candidate’s authorization.”

56. Pursuant to HRS §11-324(d), only the treasurer and deputy treasurers are authorized to receive contributions or make or incur expenditures of campaign funds on behalf of the candidate committee.

57. HRS §11-324(c) provides an exception where the candidate may serve as a treasurer “[i]n case of death, resignation, or removal of the treasurer.”

58. From March 12, 2021, to October 12, 2021, there was no reported death, resignation, or removal of the Respondent Friends’ named treasurer, who was Respondent Michael Luke.

59. Respondent Luke was not a treasurer or a deputy treasurer and therefore was not authorized to incur expenditures on behalf of Respondent Friends.

60. Each of the payment checks signed by Respondent Luke is an unauthorized expenditure of campaign funds.

61. In total, Respondent Luke signed fourteen (14) payment checks. EXHIBIT 5.

62. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$100 for each of the payment checks for a total fine

of \$1,400 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a).

COUNT II

UNAUTHORIZED HANDLING OF CAMPAIGN FUNDS (Violation of HRS §11-324(d))

63. Paragraphs 54 through 56 are re-alleged and incorporated herein.

64. Respondent Zibakalam was the treasurer for Respondent Friends for a total of three (3) days, from October 27, 2021 to November 1, 2021.

65. After November 1, 2021, Respondent Zibakalam was not a treasurer or a deputy treasurer of Respondent Friends and therefore was not authorized to handle campaign funds. Even though he was no longer the treasurer, Respondent Zibakalam remained as a sole signatory to the Respondent Friends' ASB account. EXHIBITS 9 & 17.

66. From November 1, 2021 to November 23, 2021, Respondent Komeiji was the treasurer for Respondent Friends. From November 23, 2021 to May 23, 2023, Respondent Asuncion Jr. was the treasurer and Respondent Komeiji was the deputy treasurer.

67. From November 6, 2021, up to and including November 9, 2022, Respondent Zibakalam signed off on payment checks from Respondent Friends' ASB account, authorizing payments to be withdrawn from Respondent Friends' ASB account. In total, Respondent Zibakalam signed at least two hundred and sixteen (216) payment checks. EXHIBIT 12.

68. Each of the payment checks signed by Respondent Zibakalam is an unauthorized expenditure of campaign funds.

69. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$100 for each of the payment checks for a total fine

of \$21,600 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a).

COUNT III

UNAUTHORIZED CAMPAIGN EXPENDITURES (Violation HAR §3-160-43(b)(1))

70. HAR §3-160-43(b)(1) provides “[a] candidate or candidate committee shall not pay for expenses not predominantly and directly related to a candidate’s campaign to influence the nomination or election of the candidate, including: [a]n expenditure to compensate an individual who approved the expenditure[.]”

71. From November 6, 2021 to November 9, 2022, Respondent Zibakalam signed two hundred and sixteen (216) payment checks from Respondent Friends’ ASB account. EXHIBIT 12.

72. Out of the two hundred and sixteen (216) payment checks, Respondent Zibakalam signed at least eleven (11) stipend payment checks written to himself as the payee, in the amount of \$3,000 each, authorizing expenditures to compensate himself. EXHIBIT 13.

73. These expenditures were categorized as “contract, employee & professional services” in the campaign finance reports.

74. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$100 for each of the payment checks for a total fine of \$1,100 against the Respondents for violation of this count pursuant to HRS §11-410(a).¹¹

COUNT IV

UNAUTHORIZED HANDLING OF CAMPAIGN FUNDS (Violation of HRS §11-324(d))

¹¹ There is no standardized fine for violation of HAR §3-160-43(b)(1) in the Commission’s Schedule of Fines.

75. Paragraphs 54 through 56 are re-alleged and incorporated herein.

76. On November 9, 2022, Respondent Zibakalam added Nelisa Asato as a signatory to the Respondent Friends' ASB account. EXHIBITS 16 & 17.

77. Nelisa Asato was not a treasurer or a deputy treasurer and therefore was not authorized to incur expenditures on behalf of Respondent Friends.

78. Each of the payment checks signed by Nelisa Asato is an unauthorized expenditure of campaign funds. In total, Nelisa Asato signed two (2) payment checks.

EXHIBIT 18.

79. During the time of these unauthorized expenditures, Respondent Asuncion Jr. was the treasurer and Respondent Komeiji was the deputy treasurer for Respondent Friends.

80. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$100 for each of the payment checks for a total fine of \$200 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a).

COUNT V

**FALSE REPORT
(SUPPLEMENTAL REPORT – July 1 to December 31, 2021)
(Violation of HRS §§11-331 and 11-333)**

81. HRS §11-331(a) requires candidates and treasurers to certify their disclosure reports as complete and accurate.

82. HAR §3-160-20(a) also requires that “[a] candidate committee’s reports filed

pursuant to chapter 11, part XIII, subpart D, Hawaii Revised Statutes, shall be certified by the candidate and treasurer as a true, complete, and accurate statement of the committee’s activity during the reporting period.”

83. HRS §11-333 requires the candidate and the treasurer of a candidate committee to report all contributions and expenditures received during each of the reporting periods.

84. For the Supplemental Report covering the reporting period of July 1 to December 31, 2021, Respondents timely filed the original report on January 31, 2022. At the time of the filing of the original report, Respondent Asuncion Jr. was the treasurer.

85. Respondents then filed three (3) subsequent amended Supplemental Reports on February 5, 2022, February 7, 2026, and March 9, 2026. Respondent Asuncion Jr. was the treasurer at the time of the filing of the February 5, 2022 amended report. Respondent Sasaki was the treasurer at the time of the filing of the February 7, 2026 and March 9, 2026 amended reports.

86. In their February 5, 2022 amendment, Respondents reported the following transaction(s) for the first time¹²:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Other Receipts – Schedule C	United Airlines Inc.; Refund for cancelled flight	10/8/2021	\$541.80	First Time Report

87. In their February 7, 2026 amendment, Respondents reported the following transaction(s) for the first time¹³:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
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¹² EXHIBIT 27.

¹³ EXHIBIT 28.

Contributions – Schedule A	Brant Tanaka	11/8/2021	\$6,000	First Time Report
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88. In their March 9, 2026 amendment, Respondents amended and/or reported the following transaction(s) for the first time¹⁴:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Contributions (Schedule A)	Jeffrey Hong	12/12/2021	\$1,001.01 ¹⁵	Amendment
Expenditures (Schedule B)	American Savings Bank; Bank Fee	11/24/2021	\$10	First Time Report
Expenditures (Schedule B)	ActBlue Technical Services; ActBlue credit card processing fees	12/12/2021	\$513.78 ¹⁶	Amendment
Expenditures (Schedule B)	Hawaii State Bar Association; Fee	12/13/2021	\$40	First Time Report
Expenditures (Schedule B)	Hawaiian Airlines; Airfare	12/20/2021	\$97.80	First Time Report

89. Based on the Commission’s investigation, the Commission staff found that Respondents failed to report the following contributions in the Supplemental Report covering the reporting period of July 1 to December 31, 2021, which are reflected in the Respondent Friends’ ASB account records¹⁷:

Date	Contribution	Amount
10/21/2021	Sylvia Luke	\$297.98
11/15/2021	Sylvia Luke	\$541.80
	Total Amount of Unreported Contributions	\$839.78

¹⁴ EXHIBIT 29.

¹⁵ Jeffrey Hong contribution was first reported in the original report filed on January 31, 2022, as \$1,000.01. March 9, 2026 amendment reflects an increase of \$1.

¹⁶ ActBlue fee was first reported in the original report filed on January 31, 2022, as \$513.08. March 9, 2026 amendment reflects an increase of .70 cents.

¹⁷ EXHIBIT 30. Contribution from the candidate herself should have been reported in “Schedule C: Other Receipts.” But these contributions were not reported in any of the schedules.

90. Based on the Commission’s investigation, the Commission staff found that Respondents failed to report the following expenditures in the Supplemental Report covering the reporting period of July 1 to December 31, 2021, which are reflected in the Respondent Friends’ ASB account records¹⁸:

Date	Expenditure	Amount	Check Number
11/29/2021	Emmanuel Zibakalam	\$1,033.51	1212
12/13/2021	Emmanuel Zibakalam	\$882.01	1216
	Total Amount of Unreported Expenditures	\$1,915.52	

91. In their latest amended Supplemental Report (March 9, 2026 amendment), Respondents reported a cash on hand at the beginning of the reporting period of \$423,603.02. EXHIBIT 32. This is inconsistent with the bank records, which show a bank balance of \$429,297.89 at the beginning of the reporting period. EXHIBIT 33.

92. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$500 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a) and order Respondents to file an amended report.

COUNT VI

**FALSE REPORT
(1B PRELIMINARY PRIMARY REPORT – January 1 to June 30, 2022)
(Violation of HRS §§11-331 and 11-333)**

93. Paragraphs 81 through 83 are re-alleged and incorporated herein.

94. For the 1B Preliminary Primary Report covering the reporting period of January 1

¹⁸ EXHIBIT 31.

to June 30, 2022, Respondents timely filed the original report on July 14, 2022. At the time of the filing of the original report, Respondent Asuncion Jr. was the treasurer.

95. Respondents then filed six (6) subsequent amended 1B Preliminary Primary Reports on February 12, 2025, February 7, 2026¹⁹, and March 9, 2026²⁰. Respondent Sasaki was the treasurer at the time of the filing of these six (6) amended reports.

96. In their February 12, 2025 amendment, Respondents reported the following transaction(s) for the first time²¹:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Expenditures (Schedule B)	Pagoda Floating Restaurant; AJA/Okinawan Rally	6/25/2022	\$4,500	First Time Report

97. In their February 7, 2026 first amended report, Respondents amended and/or reported the following transaction(s) for the first time²²:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Contributions (Schedule A)	Tobi J. Solidum	1/21/2022	\$5,000	First Time Report
Contributions (Schedule A)	Kristen Pae	1/21/2022	\$5,000	First Time Report
Expenditures (Schedule B)	Peter Savasta; Graphic design for website, business cards	1/5/2022	\$3,515 ²³	Amendment

¹⁹ Respondents filed two (2) amendments on February 7, 2026. Earlier amendments will be referred to as the first amended report, and later amendments will be referred to as the second amended report, following the chronological order.

²⁰ Respondents filed three (3) amendments on March 9, 2026. These amendments will be referred to as the first amended report, second amended report, and third amended report, following the chronological order.

²¹ EXHIBIT 34.

²² EXHIBIT 35.

²³ Peter Savasta expenditure was first reported on the original report filed on July 14, 2022, as \$3,553. February 7, 2026 first amendment reflects a decrease of \$38.

98. Additionally, in their February 7, 2026 first amended report, Respondents removed the previously reported \$5,000 refund to “Kristen Pae – Returned Contribution” with a reported transaction date of March 25, 2022, from their amended Schedule B. EXHIBIT 35. This contribution was previously reported in their original report filed on July 14, 2022. Based on the Commission’s investigation, this refund is not reflected in the Respondent Friends’ ASB account records.

99. In their February 7, 2026 second amended report, Respondents reported the following amendment(s)²⁴:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Expenditures (Schedule B)	Peter Savasta; Graphic design for website, business cards	1/5/2022	\$3,515.30 ²⁵	Amendment

100. In their March 9, 2026 first amended report, Respondents amended and/or reported the following transaction(s) for the first time²⁶:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Contributions (Schedule A)	Richard Klemm	5/8/2022	\$250	First Time Report
Contributions (Schedule A)	Ming Dynasty Fish & Shrimp Co., Inc.	6/23/2022	\$500	First Time Report
Contributions (Schedule A)	Elvira Lo	6/23/2022	\$500	First Time Report
Contributions (Schedule A)	Frank Law	6/23/2022	\$500	First Time Report
Contributions (Schedule A)	KK Ranch Inc.	6/23/2022	\$500	First Time Report

²⁴ EXHIBIT 36.

²⁵ February 7, 2026 second amendment reflects an increase of .30 cents.

²⁶ EXHIBIT 37.

Contributions (Schedule A)	Kainani Kraut	6/23/2022	\$1,000	First Time Report
Contributions (Schedule A)	Joannie Hsieh	6/23/2022	\$1,000	First Time Report
Contributions (Schedule A)	Joel Bongco	6/23/2022	\$1,000	First Time Report
Contributions (Schedule A)	Steven Sakata	6/23/2022	\$1,000	First Time Report
Contributions (Schedule A)	Dean Senda	6/23/2022	\$1,000	First Time Report
Expenditures (Schedule B)	The Pacific Club; Food and Beverage for Campaign Event	2/18/2022	\$2,500	First Time Report
Expenditures (Schedule B)	Allianz Partners; Trip Insurance	3/29/2022	\$12	First Time Report
Expenditures (Schedule B)	Allianz Partners; Trip Insurance	3/29/2022	\$12	First Time Report
Expenditures (Schedule B)	NGPVAN; Communications Database Fee – May 2022	5/5/2022	\$762.85	First Time Report
Expenditures (Schedule B)	The Sarrat Association of Hawaii; Event Fee	5/6/2022	\$755	First Time Report
Expenditures (Schedule B)	Richard Klemm; Refund of ActBlue Contribution	5/8/2022	\$250	First Time Report
Expenditures (Schedule B)	ActBlue Technical Services; ActBlue credit card processing fees	5/8/2022	\$203.45 ²⁷	Amendment
Expenditures (Schedule B)	Kauai Chamber of Commerce; Event Fee	5/20/2022	\$90	First Time Report
Expenditures (Schedule B)	Elite Parking Services; Parking Services	6/1/2022	\$513.09	First Time Report

101. Additionally, in their March 9, 2026 first amended report, Respondents removed

²⁷ ActBlue expenditure of \$453.45 was first reported on the original report filed on July 14, 2022. The March 9, 2026 first amended report amendment reflects a decrease of \$250.

the previously reported expenditures²⁸:

	Reported Transaction	Transaction Date	Reported Amount	Previously Reported
Expenditures (Schedule B)	Hawaiian Airlines – Air Cargo; Shipment of collateral material	1/10/2022	\$238.11	7/14/2022
Expenditures (Schedule B)	Hawaiian Airlines – Air Cargo; Shipment of collateral material	1/10/2022	\$158.74	7/14/2022
Expenditures (Schedule B)	Hawaiian Airlines; Airline Ticket Change Fee	4/14/2022	\$20	7/14/2022

102. In their March 9, 2026 second amended report, Respondents removed previously reported \$250 contribution from “Richard Klemm” with a reported transaction date of May 8, 2022, from their amended Schedule A. EXHIBIT 38.

103. In their March 9, 2026 third amended report, Respondents removed previously reported \$513.09 expenditure payment to “Elite Parking Services; Parking Services” with a reported transaction date of June 1, 2022, from their amended Schedule B. EXHIBIT 39.

104. Based on the Commission’s investigation, the Commission staff found that Respondents failed to report the following contribution in the 1B Preliminary Primary Report covering the reporting period of January 1 to June 30, 2022, which are reflected in the Respondent Friends’ ASB account records²⁹:

Date	Contribution	Amount
6/23/2022	Michael Patrick Hunnemann Selene Yueh Hsing Wang	\$1,000
	Total Amount of Unreported Contribution	\$1,000

105. Based on the Commission’s investigation, the Commission staff found that

²⁸ EXHIBIT 37.

²⁹ EXHIBIT 40.

Respondents failed to report the following expenditures in the 1B Preliminary Primary Report covering the reporting period of January 1 to June 30, 2022, which are reflected in the Respondent Friends' ASB account records³⁰:

Date	Expenditure	Amount	Check Number
1/6/2022	Emmanuel Zibakalam	\$807.03	1221
1/6/2022	Emmanuel Zibakalam	\$3,000	9002
2/10/2022	Emmanuel Zibakalam	\$1,652	1307
2/14/2022	Sylvia Luke	\$782.11	1306
2/15/2022	Ann Boticelli	\$730.81	1308
2/25/2022	Troy Hashimoto	\$175.10	1317
3/10/2022	Emmanuel Zibakalam	\$5,275.17	1321
4/4/2022	Emmanuel Zibakalam	\$6,829.74	1352
5/2/2022	Mike Luke	\$1,496.69	1357
6/2/2022	Emmanuel Zibakalam	\$5,444.86	1375
6/10/2022	Cheryl Leong	\$455.85	1385
6/15/2022	Emmanuel Zibakalam	\$1,479.16	1388
6/24/2022	Hurbert Minn	\$794.03	1335
6/24/2022	Hubert Minn	\$865.41	1378
	Total Amount of Unreported Expenditures	\$29,787.96	

106. In their original 1B Preliminary Primary Report filed on July 14, 2022, Respondents reported a cash on hand at the beginning of the reporting period of \$815,274.17. This was subsequently amended to \$821,126.67 in their latest amended 1B Preliminary Primary Report (March 9, 2026 third amendment). EXHIBIT 41. This is inconsistent with the bank records, which show a bank balance of \$793,213.27 at the beginning of the reporting period. EXHIBIT 40.

107. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$500 against the Respondents for violation of this

³⁰ EXHIBIT 40.

count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a) and order Respondents to file an amended report.

COUNT VII

FALSE REPORT (2ND PRELIMINARY PRIMARY REPORT – July 1 to July 29, 2022) (Violation of HRS §§11-331 and 11-333)

108. Paragraphs 81 through 83 are re-alleged and incorporated herein.

109. For the 2nd Preliminary Primary Report covering the reporting period of July 1 to July 29, 2022, Respondents timely filed the original report on August 3, 2022.³¹ At the time of the filing of the original report, Respondent Asuncion Jr. was the treasurer.

110. Respondents then filed seven (7) subsequent amended 2nd Preliminary Primary Reports on February 12, 2025, February 7, 2026³², March 9, 2026³³, and April 8, 2026. Respondent Sasaki was the treasurer at the time of the filing of the seven (7) subsequent amended reports.

111. For the first six (6) amendments filed between February 12, 2025 through March 9, 2026, there were no changes to the previously reported schedules of contributions (Schedule A) and expenditures (Schedule B). Respondent Friends did not report any new contributions or expenditures or remove any previously reported contributions or expenditures.³⁴

³¹ In their 2nd Preliminary Primary Report, Respondent Friends reported a \$50,000 loan in their Schedule D. This loan was made by Respondent Luke to her own campaign on July 24, 2022. Respondent Friends reported fully repaying the \$50,000 loan back to Respondent Luke on November 7, 2022, which was confirmed by the Commission's review of the Respondent Friends and Respondent Luke's personal bank records.

³² Respondents filed two (2) amendments on February 7, 2026. Earlier amendments will be referred to as the first amended report, and later amendments will be referred to as the second amended report, following the chronological order.

³³ Respondents filed three (3) amendments on March 9, 2026. These amendments will be referred to as the first amended report, second amended report, and third amended report, following the chronological order.

³⁴ The Commission's investigation involved a review of all the amended reports to ascertain any possible changes. While these first six (6) amended reports did not result in any changes to the previously reported schedules of contributions and expenditures, the number of amendments highlights the number of opportunities that Respondents had to accurately make any necessary amendments.

112. In their April 8, 2026 amended report, Respondents reported the following transaction(s) for the first time³⁵:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Contributions (Schedule A)	Young's Market Company	7/18/2022	\$6,000	First Time Report
Contributions (Schedule A)	Michael McCartney	7/18/2022	\$250	First Time Report
Expenditures (Schedule B)	Deluxe; Check Reorder	7/6/2022	\$35.50	First Time Report
Expenditures (Schedule B)	American Savings Bank; Service Fee	7/18/2022	\$13	First Time Report

113. In their original 2nd Preliminary Primary Report filed on August 3, 2022, Respondents reported a cash on hand at the beginning of the reporting period of \$166,654.83. This was subsequently amended to \$187,855.73 in their latest amended 2nd Preliminary Primary Report (April 8, 2026 amendment). EXHIBIT 43. This is inconsistent with the bank records, which show a bank balance of \$185,623.13 at the beginning of the reporting period. EXHIBIT 44.

114. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$500 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a) and order Respondents to file an amended report.

COUNT VIII

**FALSE REPORT
(FINAL PRIMARY REPORT – July 30 to August 13, 2022)
(Violation of HRS §§11-331 and 11-333)**

³⁵ EXHIBIT 42.

115. Paragraphs 81 through 83 are re-alleged and incorporated herein.

116. For the Final Primary Report covering the reporting period of July 30 to August 13, 2022, Respondents timely filed the original report on September 1, 2022. At the time of the filing of the original report, Respondent Asuncion Jr. was the treasurer.

117. Respondents then filed seven (7) subsequent amended Final Primary Reports on February 12, 2025, February 7, 2026³⁶, March 9, 2026³⁷, and April 8, 2026. Respondent Sasaki was the treasurer at the time of the filing of these seven (7) subsequent amended reports.

118. For the first six (6) amendments filed between February 12, 2025 through March 9, 2026, there were no changes to the previously reported schedules of contributions (Schedule A) and expenditures (Schedule B). Respondent Friends did not report any new contributions or expenditures or remove any previously reported contributions or expenditures.³⁸

119. In their April 8, 2026 amended report, Respondents reported the following transaction(s) for the first time³⁹:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Contributions (Schedule A)	David Lassner	8/11/2022	\$99	First Time Report

120. Based on the Commission's investigation, the Commission staff found that

³⁶ Respondents filed two (2) amendments on February 7, 2026. Earlier amendments will be referred to as the first amended report, and later amendments will be referred to as the second amended report, following the chronological order.

³⁷ Respondents filed three (3) amendments on March 9, 2026. These amendments will be referred to as the first amended report, second amended report, and third amended report, following the chronological order.

³⁸ The Commission's investigation involved a review of all the amended reports to ascertain any possible changes. While these first six (6) amended reports did not result in any changes to the previously reported schedules of contributions and expenditures, the number of amendments again highlights the number of opportunities that Respondents had to accurately make any necessary amendments.

³⁹ EXHIBIT 45.

Respondents failed to report the following expenditures in the Final Primary Report covering the reporting period of July 30 to August 13, 2022, which are reflected in the Respondent Friends' ASB account records⁴⁰:

Date	Expenditure	Amount	Check Number
8/4/2022	Emmanuel Zibakalam	\$2,130.60	1595
8/4/2022	Emmanuel Zibakalam	\$102.01	1597
	Total Amount of Unreported Expenditures	\$2,232.61	

121. In their original Final Primary Report filed on September 1, 2022, Respondents reported cash on hand at the beginning of the reporting period of \$21,664.12. This was subsequently amended to \$49,066.52 in their latest amended Final Primary Report (April 8, 2026 amendment). EXHIBIT 47. This is inconsistent with the bank records, which show a bank balance of \$49,445.62 at the beginning of the reporting period. EXHIBIT 46.

122. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$500 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a) and order Respondents to file an amended report.

COUNT IX

FALSE REPORT

**(1ST PRELIMINARY GENERAL REPORT – August 14 to September 26, 2022)
(Violation of HRS §§11-331 and 11-333)**

123. Paragraphs 81 through 83 are re-alleged and incorporated herein.

124. For the 1st Preliminary General Report covering the reporting period of August 14

⁴⁰ EXHIBIT 46.

to September 26, 2022, Respondents timely filed the original report on October 3, 2022. At the time of the filing of the original report, Respondent Asuncion Jr. was the treasurer.

125. Respondents then filed eight (8) subsequent amended 1st Preliminary General Reports on October 4, 2022, February 12, 2025, February 7, 2026⁴¹, March 9, 2026⁴², and April 8, 2026. Respondent Asuncion Jr. was the treasurer at the time of the filing of the October 4, 2022 amended report. Respondent Sasaki was the treasurer at the time of the filing of the seven (7) subsequent amended reports.

126. In their October 4, 2022 amended report, Respondents reported the following transaction(s) for the first time⁴³:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Contributions (Schedule A)	Josh Green for Hawaii; Deposit for Facility Rental (Kupu)	9/13/2022	\$150	First Time Report
Contributions (Schedule A)	Josh Green for Hawaii; Pride T-Shirt Order (Surfvivor Media, Inc.)	9/15/2022	\$175.50	First Time Report
Contributions (Schedule A)	Josh Green for Hawaii; Video Production on 9/16/22 (Snyder Pickerill)	9/20/2022	\$626.08	First Time Report
Contributions (Schedule A)	Josh Green for Hawaii; TV Ad	9/20/2022	\$52,271.47	First Time Report

⁴¹ Respondents filed two (2) amendments on February 7, 2026. Earlier amendments will be referred to as the first amended report, and later amendments will be referred to as the second amended report, following the chronological order.

⁴² Respondents filed three (3) amendments on March 9, 2026. These amendments will be referred to as the first amended report, second amended report, and third amended report, following the chronological order.

⁴³ EXHIBIT 48. To verify this information, reports filed by Candidate Committee Josh Green for Hawaii were reviewed for the same reporting period. While Josh Green for Hawaii reported several reimbursements from Respondent Friends in Schedule C (Other Receipts) for the same reporting period, based on the Commission’s investigation, none of the entries matched what was reported by Respondent Friends.

	Buys (Snyder Pickerill)			
Expenditures (Schedule B)	Kupu; Deposit for Facility Rental	9/13/2022	\$150	First Time Report
Expenditures (Schedule B)	Survivor Media Inc.; Pride T-Shirt Order	9/15/2022	\$175.50	First Time Report
Expenditures (Schedule B)	Snyder Pickerill Media Group; Video Production (9/16/22)	9/20/2022	\$626.08	First Time Report
Expenditures (Schedule B)	Snyder Pickerill Media Group; TV Ad Buys	9/20/2022	\$52,271.47	First Time Report

127. Based on the Commission’s investigation, the Commission staff found that Respondents failed to report the following expenditures in the 1st Preliminary General Report covering the reporting period of August 14 to September 26, 2022, which is reflected in the Respondent Friends’ ASB account records⁴⁴:

Date	Expenditure	Amount	Check Number
8/17/2022	Sylvia Luke	\$2,380.08	1596
9/6/2022	Sylvia Luke	\$1,166.49	1558
9/13/2022	Lynn Lally	\$2,000	1556
9/19/2022	Mike Luke	\$4,368	1392
	Total Amount of Unreported Expenditures	\$9,914.57	

128. In their original 1st Preliminary General Report filed on October 3, 2022, Respondents reported a cash on hand at the beginning of the reporting period of \$54,622.90. This was subsequently amended to \$82,124.30 in their latest amended 1st Preliminary General Report (April 8, 2026 amendment). EXHIBIT 50. This is inconsistent with the bank records, which show a bank balance of \$99,464.81 at the beginning of the reporting period. EXHIBIT 49.

⁴⁴ EXHIBIT 49.

129. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$500 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a) and order Respondents to file an amended report.

COUNT X

**FALSE REPORT
(2nd PRELIMINARY GENERAL REPORT – September 27 to October 24, 2022)
(Violation of HRS §§11-331 and 11-333)**

130. Paragraphs 81 through 83 are re-alleged and incorporated herein.

131. For the 2nd Preliminary General Report covering the reporting period of September 27 to October 24, 2022, Respondents timely filed the original report on October 31, 2022. At the time of the filing of the original report, Respondent Asuncion Jr. was the treasurer.

132. Respondents then filed eight (8) subsequent amended 2nd Preliminary General Reports on January 28, 2023, February 12, 2025, February 7, 2026⁴⁵, March 9, 2026⁴⁶, and April 8, 2026. Respondent Asuncion Jr. was the treasurer at the time of the filing of the January 28, 2023 amended report. Respondent Sasaki was the treasurer at the time of the filing of the seven (7) subsequent amended reports.

133. In their January 28, 2023 amended report, Respondents amended the following transaction(s)⁴⁷:

⁴⁵ Respondents filed two (2) amendments on February 7, 2026. Earlier amendments will be referred to as the first amended report, and later amendments will be referred to as the second amended report, following the chronological order.

⁴⁶ Respondents filed three (3) amendments on March 9, 2026. These amendments will be referred to as the first amended report, second amended report, and third amended report, following the chronological order.

⁴⁷ EXHIBIT 51.

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Expenditures (Schedule B)	Scott Culbertson Productions; Ad Production	10/20/2022	\$602 ⁴⁸	Amendment

134. In their April 8, 2026 amended report, Respondents reported the following transaction(s) for the first time⁴⁹:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Expenditures (Schedule B)	Picture This Photography; Production and Printing Services	10/19/2022	\$261.77	First Time Report
Expenditures (Schedule B)	Roosevelt Alumni Foundation; Event Fee	10/24/2022	\$150	First Time Report

135. Based on the Commission’s investigation, the Commission staff found that Respondents failed to report the following contribution in 2nd Preliminary General Report covering the reporting period of September 27 to October 24, 2022 which is reflected in the Respondent Friends’ ASB account records⁵⁰:

Date	Contribution	Amount
10/24/2022	Remi Wada Tanouye Jonathan Tanouye	\$625
	Total Amount of Unreported Contributions	\$625

136. Based on the Commission’s investigation, the Commission staff found that

⁴⁸ The expenditure to Scott Culbertson was first reported on the original report filed on October 31, 2022 as \$752.75. The January 28, 2023 amendment reflects a decrease of \$150.75.

⁴⁹ EXHIBIT 52.

⁵⁰ EXHIBIT 53.

Respondents failed to report the following expenditure in 2nd Preliminary General Report covering the reporting period of September 27 to October 24, 2022, which is reflected in the Respondent Friends’ ASB account records⁵¹:

Date	Expenditure	Amount	Check Number
10/12/2022	Emmanuel Zibakalam	\$653.12	1503
	Total Amount of Unreported Expenditures	\$653.12	

137. In their original 2nd Preliminary General Report filed on October 31, 2022, Respondents reported a cash on hand at the beginning of the reporting period of \$130,003.64. This was subsequently amended to \$157,505.04 in their latest amended 2nd Preliminary General Report (April 8, 2026 amendment). EXHIBIT 54. This is inconsistent with the bank records, which show a bank balance of \$187,817.59 at the beginning of the reporting period. EXHIBIT 53.

138. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$500 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a) and order Respondents to file an amended report.

COUNT XI

**FALSE REPORT
(FINAL ELECTION PERIOD REPORT – October 25 to November 8, 2022)
(Violation of HRS §§11-331 and 11-333)**

139. Paragraphs 81 through 83 are re-alleged and incorporated herein.

140. For the Final Election Period Report covering the reporting period of October 25

⁵¹ Id.

to November 8, 2022, Respondents timely filed the original report on November 29, 2022. At the time of the filing of the original report, Respondent Asuncion Jr. was the treasurer.

141. Respondents then filed eight (8) subsequent amended Final Election Period Reports on February 5, 2023, February 12, 2025, February 7, 2026⁵², March 9, 2026⁵³, and April 8, 2026. Respondent Asuncion Jr. was the treasurer at the time of the filing of the February 5, 2023 amended report. Respondent Sasaki was the treasurer at the time of the filing of the seven (7) subsequent amendments.

142. In their February 5, 2023 amended report, Respondents reported the following transaction(s) for the first time⁵⁴:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Contributions (Schedule A)	Ann Freed	11/8/2022	\$20	First Time Report

143. In their April 8, 2026 amended report, Respondents reported the following transaction(s) for the first time⁵⁵:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Expenditures (Schedule B)	Carillo Digital; Media Production Services	11/1/2022	\$5,975	First Time Report
Expenditures (Schedule B)	Adult Friends for Youth; Event Fee	11/8/2022	\$600	First Time Report

144. Based on the Commission’s investigation, the Commission staff found that

⁵² Respondents filed two (2) amendments on February 7, 2026. Earlier amendments will be referred to as the first amended report, and later amendments will be referred to as the second amended report, following the chronological order.

⁵³ Respondents filed three (3) amendments on March 9, 2026. These amendments will be referred to as the first amended report, second amended report, and third amended report, following the chronological order.

⁵⁴ EXHIBIT 55.

⁵⁵ EXHIBIT 56.

Respondents failed to report the following expenditure in the Final Election Period Report covering the reporting period of October 25 to November 8, 2022 which is reflected in the Respondent Friends’ ASB account records⁵⁶:

Date	Expenditure	Amount	Check Number
11/8/2022	Emmanuel Zibakalam	\$816.76	1452
	Total Amount of Unreported Expenditure	\$816.76	

145. In their original Final Election Period Report filed on November 29, 2022, Respondents reported a cash on hand at the beginning of the reporting period of \$127,761.12. This was subsequently amended to \$155,001.50 in their latest amended Final Election Period Report (April 8, 2026 amendment). EXHIBIT 58. This is inconsistent with the bank records, which show a bank balance of \$199,108.82 at the beginning of the reporting period. EXHIBIT 57.

146. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$500 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a) and order Respondents to file an amended report.

COUNT XII

**FALSE REPORT
(SUPPLEMENTAL REPORT – November 9 to December 31, 2022)
(Violation of HRS §§11-331 and 11-333)**

147. Paragraphs 81 through 83 are re-alleged and incorporated herein.

148. For the Supplemental Report covering the reporting period of November 9

⁵⁶ EXHIBIT 57.

to December 31, 2022, Respondents timely filed the original report on January 15, 2023. At the time of the filing of the original report, Respondent Asuncion Jr. was the treasurer.

149. Respondents then filed eight (8) subsequent amended Supplemental Reports on February 12, 2025, February 7, 2026⁵⁷, March 9, 2026⁵⁸, and April 8, 2026⁵⁹. Respondent Sasaki was the treasurer at the time of the filing of these eight (8) amended report.

150. In their April 8, 2026 first amended report, Respondents reported the following transaction(s) for the first time⁶⁰:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Expenditures (Schedule B)	HISCOX Insurance; Insurance Premium	11/18/2022	\$28.87	First Time Report
Expenditures (Schedule B)	WIX.com Ltd; Website Hosting Fee	11/21/2022	\$26.12	First Time Report
Expenditures (Schedule B)	PANCI, LLC; Hair & Makeup for Campaign Photos	12/5/2022	\$471.20	First Time Report
Expenditures (Schedule B)	Hawaii Self Storage; Storage Unit for Campaign Equipment	12/5/2022	\$473.30	First Time Report
Expenditures (Schedule B)	T-Mobile; Campaign Phone	12/7/2022	\$85	First Time Report
Expenditures (Schedule B)	WIX.com Ltd; Website Hosting Fee	12/7/2022	\$12.54	First Time Report
Expenditures (Schedule B)	HISCOX Insurance; Insurance Premium	12/19/2022	\$26.12	First Time Report
Expenditures (Schedule B)	WIX.com Ltd; Website Hosting Fee	12/19/2022	\$26.12	First Time Report

⁵⁷ Respondents filed two (2) amendments on February 7, 2026. Earlier amendments will be referred to as the first amended report, and later amendments will be referred to as the second amended report, following the chronological order.

⁵⁸ Respondents filed three (3) amendments on March 9, 2026. These amendments will be referred to as the first amended report, second amended report, and third amended report, following the chronological order.

⁵⁹ Respondents filed two (2) amendments on April 8, 2026. These amendments will be referred to as the first amended report and second amended report, following the chronological order.

⁶⁰ EXHIBIT 59.

151. In their April 8, 2026 second amended report, Respondents amended the following transaction(s)⁶¹:

	Reported Transaction	Transaction Date	Reported Amount	First Time Report or Amendment
Expenditures (Schedule B)	HISCOX Insurance; Insurance Premium	12/19/2022	\$28.83 ⁶²	Amendment

152. Based on the Commission’s investigation, the Commission staff found that Respondents failed to report the following expenditures in the Supplemental Report covering the reporting period of November 9 to December 31, 2022, which is reflected in the Respondent Friends’ ASB account records⁶³:

Date	Expenditure	Amount	Check Number
11/9/2022	Sylvia Luke	\$904.85	1451
11/9/2022	Sylvia Luke	\$70.61	1479
11/9/2022	Sylvia Luke	\$975.98	1537
11/9/2022	Sylvia Luke	\$485.44	1538
11/9/2022	Sylvia Luke	\$1,973.23	1546
11/14/2022	Mike Luke	\$1,207.54	1502
11/14/2022	Mike Luke	\$1,558.53	1566
11/21/2022	Sylvia Luke	\$110.60	1483
11/22/2022	Emmanuel Zibakalam	\$50	1480
	Total Amount of Unreported Expenditures	\$7,336.78	

153. In their original Supplemental Report filed on January 15, 2023, Respondents reported a cash on hand at the beginning of the reporting period of \$102,819.60. This was subsequently amended to \$123,484.98 in their latest amended Supplemental Report (April 8,

⁶¹ EXHIBIT 60.

⁶² The expenditure to HISCOX Insurance was first reported on the April 8, 2026 first amended report as \$26.12. The April 8, 2026 second amendment reflects an increase of \$2.71.

⁶³ EXHIBIT 61.

2026 second amendment). EXHIBIT 62. This is inconsistent with the bank records, which show a bank balance of \$185,100.58 at the beginning of the reporting period. EXHIBIT 61.

154. The Commission staff recommends the Commission to refer this count for criminal prosecution pursuant to HRS §11-411. In the alternative, the staff recommends that the Commission assess an administrative fine of \$500 against the Respondents for violation of this count pursuant to the Schedule of Fines adopted under HAR §3-160-73(a) and order Respondents to file an amended report.

RELIEF REQUESTED

For the reasons provided above, it is requested that the Commission:

- A. Make a finding that it believes that Respondents have recklessly, knowingly, or intentionally committed a violation of law and refer this complaint to the Attorney General for further investigation and potential prosecution pursuant to HRS §§11-404(4), 11-411, and 11-412.

Or, in the alternative:

- A. Make a preliminary determination, pursuant to HRS §11-405(a), that there is probable cause to believe that the Hawaii campaign finance law has been violated by Respondents as described above;
- B. Assess total administrative fine of **\$28,300** for violations of Counts I through XII.
 - (1) \$23,200 for Counts I, II, and IV
(i.e., \$100 fine x 232 violations);
 - (2) \$1,100 for Count III
(i.e., \$100 fine x 11 violations);
 - (3) \$4,000 for Counts V through XII
(i.e., \$500 fine x 8 violations);
- C. Order that any and all administrative fines be deposited in the general fund,

pursuant to HRS §11-410(e) within twenty (20) days of Respondents' receipt of this Order; and

- D. Order Respondents to amend the reports referenced in Counts V through XII so that the reports accurately reflect the activity in the bank statements, within twenty (20) days of Respondents' receipt of this Order.

DATED: Honolulu, Hawai'i, May 21, 2026.



KRISTIN E. IZUMI-NITAO
Executive Director
Campaign Spending Commission

CAMPAIGN SPENDING COMMISSION

STATE OF HAWAII

IN RE THE MATTER OF

SYLVIA LUKE, MICHAEL LUKE,
EMMANUEL ZIBAKALAM, LEODOLOFF R.
ASUNCION JR., KALOWENA KOMEIJI,
MATTHEW W. SASAKI, and FRIENDS OF
SYLVIA LUKE,

Respondents.

DOCKET NO. 26-05

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Executive Director's Complaint filed on May 21, 2026, will be duly served upon the following parties listed below on the same day as the filing date, by mailing a copy via United States Postal Service Certified Mail, at their last-known address:

Sylvia Luke
P.O. Box 2804
Honolulu, HI 96803

Respondent

Michael Luke
P.O. Box 2804
Honolulu, HI 96803

Respondent

Emmanuel Zibakalam
P.O. Box 2804
Honolulu, HI 96803

Respondent

Leodoloff R. Asuncion Jr.
1155 Wainiha St
Apt D
Honolulu, HI 96825

Respondent

Kalowena Komeiji
P.O. Box 2804
Honolulu, HI 96803

Respondent

Matthew W. Sasaki
P.O. Box 2804
Honolulu, HI 96803

Respondent

Friends of Sylvia Luke
P.O. Box 2804
Honolulu, HI 96803

Respondent

DATED: Honolulu, Hawai'i, May 21, 2026.



KRISTIN E. IZUMI-NITAO
Executive Director
Campaign Spending Commission