

STAND. COM. REP. NO. 2668

Honolulu, Hawaii

FEB 20 2026

RE: S.B. No. 2145

Honorable Ronald D. Kouchi  
President of the Senate  
Thirty-Third State Legislature  
Regular Session of 2026  
State of Hawaii

Sir:

Your Committee on Public Safety and Military Affairs, to which was referred S.B. No. 2145 entitled:

"A BILL FOR AN ACT RELATING TO RECORDINGS OF LAW ENFORCEMENT ACTIVITIES,"

begs leave to report as follows:

The purpose and intent of this measure is to establish:

- (1) The right of a person to record law enforcement activities; and
- (2) A private right of action for any violation of the right to record law enforcement activities.

Your Committee received testimony in support of this measure from the Office of the Public Defender; ACLU Hawai'i; Fujiwara & Rosenbaum, LLC; Holomua Outreach; Imua Alliance; League of Women Voters of Hawaii; Libertarian Party of Hawaii; Media Council Hawai'i; and twenty-nine individuals.

Your Committee received testimony in opposition to this measure from the Honolulu Police Department, Maui Police Department, and two individuals.

Your Committee finds that the Hawaii Supreme Court and federal courts have held that the First Amendment of the United States Constitution protects an individual's right to record law



enforcement activity, ensuring government accountability and reliable documentation of police misconduct. The importance of this right has rarely been so clear, given the increasing frequency and intensity of violent interactions involving federal law enforcement.

Your Committee further finds that this measure proactively reaffirms and protects the constitutional right of individuals to record law enforcement activity. By establishing a private right of action, this measure also provides a crucial tool for individuals to protect their rights and allows them to hold law enforcement officers accountable when misconduct occurs.

As affirmed by the record of votes of the members of your Committee on Public Safety and Military Affairs that is attached to this report, your Committee is in accord with the intent and purpose of S.B. No. 2145 and recommends that it pass Second Reading and be referred to your Committee on Judiciary.

Respectfully submitted on  
behalf of the members of the  
Committee on Public Safety and  
Military Affairs,



CAROL FUKUNAGA, Chair



The Senate  
Thirty-Third Legislature  
State of Hawai'i

**Record of Votes**  
**Committee on Public Safety and Military Affairs**  
**PSM**

Bill / Resolution No.:* <b>SB2145</b>	Committee Referral: <b>PSM, JDC</b>	Date: <b>1-28-2020</b>		
<input type="checkbox"/> The Committee is reconsidering its previous decision on this measure. If so, then the previous decision was to: _____				
The Recommendation is: <input checked="" type="checkbox"/> Pass, unamended 2312 <input type="checkbox"/> Pass, with amendments 2311 <input type="checkbox"/> Hold 2310 <input type="checkbox"/> Recommit 2313				
<b>Members</b>	<b>Aye</b>	<b>Aye (WR)</b>	<b>Nay</b>	<b>Excused</b>
FUKUNAGA, Carol (C)	X			
LEE, Chris (VC)	X			
HASHIMOTO, Troy N.				X
INOUYE, Lorraine R.	X			
DECORTE, Samantha	X			
<b>TOTAL</b>	<b>4</b>			<b>1</b>
Recommendation: <input checked="" type="checkbox"/> Adopted <input type="checkbox"/> Not Adopted				
Chair's or Designee's Signature: <div style="text-align:center; font-size: 2em; margin-top: 10px;">  </div>				
<b>Distribution:</b> Original     Yellow     Pink File with Committee Report     Committee     Drafting Agency				

**\*Only one measure per Record of Votes**