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Jewish culture for a just world

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**Re: REG 2023-02: Artificial Intelligence in Campaign Ads**

The Workers Circle urges the Federal Election Commission to ban the use of deceptive AI generated deepfakes in campaign ads.

The Federal Election Commission is granted the ability to regulate artificial intelligence through the Federal Election Campaign Act, specifically 52 U.S.C. §30124. The law focuses on “fraudulent misrepresentation.” Deepfakes can be used in a harmful manner by opposing candidates to make it appear as if candidates are saying words or performing actions that they are not. This amounts to “fraudulent misrepresentation” of the candidate. Deepfakes pose an obvious threat to our elections.

The Workers Circle is a national, secular, Jewish social justice organization founded by Eastern European immigrants who came to the United States fleeing autocracy and persecution, and seeking democratic freedoms and economic opportunities at the turn of the 20th century. That history drives our work for an inclusive democracy and human equality today.

Our nation’s free and fair elections are the cornerstone of democracy. The use of deceptive AI generated deepfakes in campaign ads intentionally aims to confuse voters and undermines the people’s ability to evaluate candidates. It is a troubling and easily spread form of misinformation that compromises our democratic election process.

The Workers Circle supports the **Petition for Rulemaking to Clarify that the Law Against “Fraudulent Misrepresentation” (52 U.S.C. §30124) Applies to Deceptive AI Campaign Communications** submitted by Public Citizen.

We are counting on the Federal Election Commission to ban the use of deceptive AI generated deepfakes in campaign ads.

Sincerely,

Noelle Damico  
Director of Social Justice  
New York, New York

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