

COMPLIANCE CHECKLIST • 2026 EDITION

California AI Photo Disclosure Checklist

A 1-page pre-listing review for California real estate agents. AB 2655 effective January 1, 2026.

THE LAW IN ONE SENTENCE

If you use AI to alter a listing photo, you must disclose it in the listing — or face buyer claims, DRE scrutiny, and potential civil penalties under California AB 2655.

1. IDENTIFY WHAT'S AI-ENHANCED

- Virtual staging**
AI-added furniture, rugs, art, or decor
- Sky replacement**
Cloudy sky swapped for blue/sunset
- Lawn retouch**
Browning grass made green
- AI declutter**
Removed cars, cords, personal items
- Light/shadow boost**
AI-brightened rooms or relit shots
- Generative fill / expand**
AI-extended frame edges or removed objects

2. DISCLOSE CORRECTLY

- Per-photo labels**
Mark each altered image (#3, #7...)
- Type of enhancement**
Staging vs. sky vs. declutter, etc.
- Original available on request**
Keep unedited source file accessible
- Disclosure on listing + MLS + flyer**
Same language everywhere, not just one place

3. USE THIS DISCLOSURE LANGUAGE

PASTE-READY DISCLOSURE LANGUAGE

"Photos #4 and #7 contain AI-enhanced virtual staging. All other photos are unaltered representations of the property as of [date]. See QR code on listing for full per-photo disclosure, original images, and timestamps."

Swap in the photo numbers and date for each listing. Add the QR-Real Estate disclosure QR code to page 1 of every flyer.

4. KEEP THE PAPER TRAIL

- Save original photos**
Unedited files stored for 3+ years
- Log enhancement tool used**
e.g., BoxBrownie, VirtualStagingAI, v1.2
- Date-stamp every edit**
When photo was taken + when AI was applied
- Buyer signs acknowledgment**
Include in offer package, initial per photo