
SENATE COMMITTEE ON PUBLIC SAFETY

Senator Jesse Arreguín, Chair
2025 - 2026 Regular

Bill No: AB 2624 **Hearing Date:** June 30, 2026
Author: Bonta
Version: May 22, 2026
Urgency: No **Fiscal:** Yes
Consultant: ML

Subject: *Privacy for immigration support services providers*

HISTORY

Source: Coalition for Human Immigrant Rights of Los Angeles; Women’s Foundation of California

Prior Legislation: AB 82 (Ward), Ch. 679, Stats. 2025
AB 2099 (Bauer-Kahan), Ch. 821, Stats. of 2024
AB 1131 (Newman), Chapter 554, Stats. of 2022
AB 1356 (Bauer-Kahan), Ch. 191, Stats. of 2021
AB 3140 (Bauer-Kahan), not heard in Assembly Public Safety, 2020
SB 636 (Corbett), Ch. 200, Stats. of 2011
AB 2251 (Evans), Ch. 486, Stats. of 2006
SB 603 (Ortiz), Ch. 481, Stats. of 2006
SB 780 (Ortiz), Ch. 899, Stats. of 2001
SB 489 (Alpert), Ch. 1005, Stats. of 1998
AB 797 (Shelley) Ch. 380, Stats. of 2002

Support: American Federation of State, County and Municipal Employees, AFL-CIO; California Community Foundation; California Immigrant Policy Center; California Initiative for Technology & Democracy, A Project of California Common CAUSE; California Teachers Association; Democrats of Rossmoor; Immigrant Defenders Law Center; Immigrants Rising; Powerca Action; San Francisco Marin Medical Society; The Translatin@ Coalition; Unidosus; Western Center on Law & Poverty

Opposition: California Baptist for Biblical Values; California Family Council

Assembly Floor Vote: 57 - 19

PURPOSE

The purpose of this bill is to expand the Secretary of State (SOS)’s Safe At Home (SAH) program to, and to establish new online privacy protections for, designated immigration support services (DISS) providers, employees, or volunteers, as specified.

Existing law establishes the SAH confidentiality program within the office of the SOS in order to enable state and local agencies to both accept and respond to requests for public records without

disclosing the changed name or address of a victim of domestic violence, sexual assault, stalking, human trafficking, child abduction, or elder or dependent adult abuse. (Gov. Code, § 6205.)

Existing law makes legislative findings that persons attempting to escape from actual or threatened domestic violence, sexual assault, stalking, human trafficking, child abduction, or elder or dependent adult abuse frequently establish new names or addresses to prevent their assailants or probable assailants from finding them. (Gov. Code, § 6205.)

Existing law allows reproductive health care and gender affirming care providers, employees, volunteers, and patients to apply to the SAH address confidentiality program through a community-based victims' assistance program, as specified. (Gov. Code, § 6215, et seq.)

Existing law requires an applicant, as part of their application, to provide the following to qualify for the health care provider address confidentiality program:

- Documentation showing that the individual is to commence employment or is currently employed as a provider or employee at a designated health care services facility or is volunteering at a designated health care services facility.
- A certified statement signed by a person authorized by the designated health care services facility stating that the facility or any of its providers, employees, volunteers, or patients is or was the target of threats or acts of violence within one year of the date of the application, and stating that a person who willfully certifies as true any material matter pursuant to this section which he or she knows to be false is guilty of a misdemeanor.
- A sworn statement that the applicant fears for their safety or the safety of their family, or the safety of the minor or incapacitated person on whose behalf the application is made due to their affiliation with the designated health care services facility providing the declaration described in 4b). (Gov. Code, § 6215.2, subd. (a)(1).)

Existing law provides that if the applicant alleges that the basis for the application is that the applicant is a designated health care services facility volunteer, the application must, in addition to the documents specified above, be accompanied by designated health care services facility documentation showing the length of time the volunteer has committed to working at the facility. (Gov. Code, § 6215.2, subd. (a)(2).)

Existing law requires that the SOS certify a successful applicant as a program participant for four years following the date of filing, unless the certification is withdrawn or invalidated before that date, except designated health care services facilities volunteers shall be certified until six months from the last date of volunteering with the facility. Provides that the SOS shall establish a renewal procedure. (Gov. Code §§ 6206, subd. (c), 6215.2, subd. (e).)

Existing law allows a participant to withdraw from the SAH program. Provides the SOS with the authority to cancel a program participant's certification for specified reasons. (Gov. Code, §§ 6206.5, 6206.7, 6215.3, 6215.4.)

Existing law provides that a person, business, or association may not solicit, sell, or trade on the internet the personal information or image of a designated health care services patient, provider, or assistant with the intent to do either of the following:

- Incite a third person to cause imminent great bodily harm to the person identified in the posting or display, or to a coresident of that person, where the third person is likely to commit this harm.
- Threaten the person identified in the posting or display, or a coresident of that person, in a manner that places the person identified or the coresident in objectively reasonable fear for their personal safety. (Gov. Code, § 6218, subd. (a)(1).)

Existing law allows a designated health care services patient, provider, or assistant whose personal information or image is solicited, sold, or traded, or any individual, entity, or organization authorized to act on their behalf, to bring an action for damages up to a maximum of three times the actual damages, but in no case less than \$4,000. (Gov. Code, § 6218, subd. (a)(2).)

Existing law prohibits a person, business, or association from publicly posting or publicly displaying, disclosing, or distributing, on internet websites or social media, the personal information or image of a designated health care services patient, provider, or assistant if that individual, or any individual, entity, or organization authorized to act on their behalf, has made a written demand of that person, business, or association to not disclose the personal information or image. (Gov. Code, § 6218, subd. (b)(1).)

Existing law requires that a written demand include a statement declaring that the individual is subject to the protection of this section and describing a reasonable fear for the safety of that individual or of any person residing at the individual's home address.

Existing law specifies that a demand shall be effective for four years, regardless of whether the individual's affiliation with a designated health care services facility has expired prior to the end of the four-year period.

Existing law provides that a designated health care services patient, provider, or assistant whose personal information or image is made public as a result of a failure to honor a demand, or any individual, entity, or organization authorized to act on their behalf, may bring an action seeking injunctive or declarative relief in any court of competent jurisdiction. States that if a jury or court finds that a violation has occurred, it may grant injunctive or declarative relief and shall award the successful plaintiff court costs and reasonable attorney's fees.

Existing law clarifies that an interactive computer service or access software provider (which is exempt from liability for third party content under federal law) shall not be liable under this section unless the service or provider intends to abet or cause bodily harm that is likely to occur or threatens to cause bodily harm to a designated health care services patient, provider, or assistant, or any person residing at the same home address. (Gov. Code, § 6218, subd. (a)-(d).)

Existing law provides that any reproductive health service provider, employee, volunteer, or patient who is placed in reasonable fear by the posting of their home address and phone number on an Internet website may make a written demand that such information be removed from the website, so long as the demand includes a sworn statement describing the reasonable fear and attesting that the person is a member of the group protected by the statute. Provides injunctive relief. (Gov. Code, § 6281, subd. (b).)

Existing law makes it a misdemeanor, punishable by up to six months in a county jail, a fine of not more than \$2,500, or both that fine and imprisonment, to post the home address, telephone number, or personally identifying information about a provider, employee, volunteer, or patient of a reproductive health service facility or other individuals residing at the same home address with the intent that another person imminently use that information to commit a crime involving violence or a threat of violence against that person or entity. If the violation leads to bodily injury of the person, it is a misdemeanor punishable by up to one year in a county jail, a fine of up to \$5,000, or both that fine and imprisonment. (Gov. Code, § 6218.01.)

This bill defines all of the following for purposes of the bill:

- “Address” means a residential street address, school address, or work address of an individual, as specified on the individual’s application to be a program participant under this chapter.
- “Designated immigration support services (DISS)” means services provided to the immigrant population, including, but not limited to, legal representation, legal assistance, advocacy, case management, humanitarian relief, immigration resources, referrals, translation services, counseling services, and health care.
- “DISS provider, employee, or volunteer” means a person who provides, assists in providing, or receives immigration support services at a designated immigration support services facility.
- “DISS facility” means a facility where immigration support services are provided, including, but not limited to, nonprofit organization offices, Department of Justice (DOJ)-recognized entities, community legal clinics, law offices, accredited representative sites that provide immigration legal services, and health care facilities.
- “Domicile” means a place of habitation, as defined in the Elections Code.
- “Harassment” is repeated, unreasonable, and unwelcome conduct directed at a targeted individual that would cause a reasonable person to fear for their own safety or the safety of a household member. Harassing conduct may include, but is not limited to, following, stalking, telephone calls, or written correspondence.
- “Image” includes, but is not limited to, a photograph, video footage, sketch, or computer-generated image that provides a means to visually identify the person depicted.
- “Personal information” means information that identifies, relates to, describes, or is capable of being associated with a designated immigration support services provider, employee, or volunteer, including, but not limited to, their name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, license plate number, employment, employment history, and financial information.
- “Publicly post” or “publicly display” means to intentionally communicate or otherwise make available to the general public.

Safe at Home Program

This bill authorizes a DISS provider, employee, volunteer, parent or guardian acting on behalf of a minor, or a guardian acting on behalf of an incapacitated person, as specified, who is domiciled in California, to apply to the SOS SAH program to have an address designated by the SOS to serve as the person’s address or the address of the minor or incapacitated person.

This bill requires the application process to include a requirement that the applicant meet with a counselor and receive orientation information about the SAH program.

This bill mandates the SOS to approve an application if it is filed in the manner for, and on the form prescribed by, the SOS and it contains all of the following:

- If the applicant alleges that the basis for the application is that the applicant, or the minor or incapacitated person on whose behalf the application is made, is a DISS provider, employee, or volunteer and is fearful for their safety or the safety of their family because of their affiliation with a DISS facility, and the application is accompanied by all of the following:
 - Documentation showing that the individual is to commence employment or is currently employed as a provider or employee at a designated immigration support services facility or is volunteering at a DISS facility;
 - One of the following:
 - A certified statement signed by a person authorized by that designated immigration support services facility stating that the facility or any of its providers, employees, or volunteers is or was the target of threats, harassment, or acts of violence or harassment within one year of the date of the application. A person who willfully certifies as true any material pursuant to this provision that the person knows to be false is guilty of a misdemeanor;
 - A certified statement signed by the DISS provider or employee of, or volunteer for, the DISS facility stating that they have been the target of threats, harassment, or acts of violence within one year of the date of the application because of their association with the designated support services facility. A person who willfully certifies as true any material pursuant to this provision that the person knows to be false is guilty of a misdemeanor;
 - A workplace violence restraining order, as specified in existing law or a civil restraining order, as specified in existing law, protecting the applicant or the minor or incapacitated person on whose behalf the application is made.
 - A sworn statement that the applicant fears for their safety or the safety of their family, or the safety of the minor or incapacitated person on whose behalf the application is made due to their affiliation with the DISS facility authorized to provide the declaration, as specified.
- Documentation by the DISS facility showing the length of time a volunteer requesting inclusion in the SAH program has committed to working at the facility in addition to the documents specified above, if the applicant alleges that the basis for the application is that the applicant is a DISS facility volunteer.

- A designation of the SOS as agent for purposes of service of process and for the purpose of receipt of mail.
 - Requires service on the SOS of any summons, writ, notice, demand, or process to be made by delivering to the address confidentiality program personnel of the office of the SOS two copies of the summons, writ, notice, demand, or process.
 - Requires the SOS to immediately cause a copy of a summons, writ, notice, demand, or process served on the SOS to be forwarded to the program participant at the address shown on the records of the SAH program so that the summons, writ, notice, demand, or process is received by the program participant within three days of the SOS having received it.
 - Requires the SOS to keep a record of all summonses, writs, notices, demands, and processes served upon the SOS under this new DISS addition to the SAH and record the time of that service and the SOS' action.
 - Holds the office of the SOS and any agent or person employed by the SOS harmless from any liability in any action brought by a person injured or harmed as a result of the handling of first-class mail on behalf of program participants.
- The mailing address where the applicant can be contacted by the SOS, and the telephone number or numbers where the applicant can be called by the SOS.
- The address or addresses that the applicant requests not to be disclosed for the reason that disclosure will increase the risk of threat or acts of violence or harassment toward the applicant.
- The signature of the applicant and of any individual or representative of any office designated in writing who assisted in the preparation of the application, and the date on which the applicant signed the application.

This bill requires applications to be filed with the office of the SOS and to be accompanied by payment of a fee to be determined by the SOS. Prohibits the fee from exceeding the reasonable costs of enrolling in DISS SAH program and allows annual fees to be assessed by the SOS to defray the reasonable costs of maintaining the DISS SAH program. Requires annual fees assessed by the SOS to also be used to reimburse the General Fund for any amounts expended from that fund for the purposes of this new program.

This bill mandates that the SOS certify the applicant as a DISS SAH participant upon filing a properly completed application. Requires applicants, with the exception of DISS facilities volunteers, to be certified for four years following the date of filing unless the certification is withdrawn or invalidated before that date. Requires DISS facility volunteers to be certified until six months from the last date of volunteering with the facility. Mandates the SOS establish a renewal procedure in regulations and allows a minor program participant who reaches 18 years of age to renew as an adult following the renewal procedures.

This bill makes a person who falsely attests in an application that disclosure of the applicant's address would endanger the applicant's safety or the safety of the applicant's family or the minor

or incapacitated person on whose behalf the application is made, or who knowingly provides false or incorrect information upon making an application, guilty of a misdemeanor.

This bill mandates a notice to be printed in bold type and in a conspicuous location on the face of the application informing the applicant of the penalties, as specified.

This bill requires the SOS to cancel certification of a program participant who fails to disclose a change in employment status, or termination as a provider or volunteer.

This bill requires the SOS to retain records upon termination of a program participant's certification as follows:

- Except as specified, any records or documents pertaining to a DISS SAH program participant shall be held confidential.
- All records or documents pertaining to a program participant shall be retained for a period of three years after termination of certification and then destroyed without further notice.

This bill authorizes a DISS SAH program participant to withdraw from program participation by submitting to the SOS written notification of withdrawal and their current identification card and certification to be terminated on the date of the receipt of this notification.

This bill authorizes the SOS to terminate a program participant's certification and invalidate the participant's authorization card for any of the following reasons:

- The program participant's certification term has expired, and certification renewal has not been completed;
- The SOS has determined that false information was used in the application process to qualify as a program participant or that participation in the program is being used as subterfuge to avoid detection or illegal or criminal activity or apprehension by law enforcement;
- The program participant no longer resides at the residential address provided to the SOS, and has not provided at least seven days' prior notice in writing of a change in address;
- A service of process document or mail forwarded to the program participant by the SOS is returned as non-deliverable;
- The program participant who is a provider, employee, or volunteer fails to disclose a change in employment, or termination as volunteer or provider;
- The program participant, who reaches 18 years of age during their certification term, has not renewed their certification within 60 days of them reaching 18 years of age.

This bill allows the SOS to refuse to renew a program participant's certification if the adult program participant or the parent or guardian acting on behalf of a minor or incapacitated person has abandoned their domicile in this state.

This bill requires the SOS to send written notification of the intended termination to the program participant if termination is based on false attestation.

This bill grants the DISS SAH program participant 30 business days in which to appeal the termination under procedures developed by the SOS.

This bill requires the SOS to notify in writing the county elections official and authorized personnel of the appropriate county clerk's office and the county recording office of the program participant's certification withdrawal, invalidation, expiration, or termination.

This bill requires authorized personnel, upon receipt of this termination notification, to transmit to the SOS all appropriate administrative records pertaining to the DISS SAH participant and the record transmitting agency is no longer responsible for maintaining the confidentiality of a terminated program participant's record.

This bill authorizes the SOS to disclose information contained in the participant's application following termination of program participant certification, as specified.

This bill authorizes a DISS SAH program participant to request that state and local agencies use the address designated by the SOS as the participant's address.

This bill requires state and local agencies to accept the address designated by the SOS as a program participant's substitute address when creating a public record, unless the SOS has determined both of the following:

- The agency has a bona fide statutory or administrative requirement for the use of the address that would otherwise be confidential under this chapter.
- The address will be used only for those statutory and administrative purposes and shall not be publicly disseminated.

This bill authorizes a program participant to request that state and local agencies use the address designated by the SOS as the DISS SAH program participant's address.

This bill states that when modifying or maintaining a public record, excluding the record of a birth, fetal death, death, or marriage registered under the relevant Health and Safety Code sections, a state and local agency must accept the address designated by the SOS as a program participant's substitute address, unless the SOS has determined both of the following:

- The agency has a bona fide statutory or administrative requirement for the use of the address that would otherwise be confidential under this chapter;
- This address will be used only for those statutory and administrative purposes and shall not be publicly disseminated.

This bill authorizes a DISS SAH program participant to use the address designated by the SOS as the participant's work address.

This bill requires the SOS to forward all first-class mail and all mail sent by a governmental agency to the appropriate program participants.

This bill authorizes the office of the SOS, in its discretion, to refuse to handle or forward packages regardless of size or type of mailing.

This bill states that, notwithstanding the requirement that state and local agencies accept the SOS DISS SAH program address, a program participant must comply with the provisions specified in the Vehicle Code if requesting suppression of DMV records.

This bill requires DISS SAH program participants to also comply with all other provisions of the Vehicle Code relating to providing current address information to the DMV.

This bill authorizes a program participant who is otherwise qualified to vote to seek to register and vote in a confidential manner, as specified.

This bill prohibits the SOS from making a program participant's address, other than the address designated by the SOS, available for inspection or copying, except under any of the following circumstances:

- If requested by a law enforcement agency, to the law enforcement agency;
- If directed by a court order, to a person identified in the order; or
- If certification has been terminated as specified.

This bill requires the SOS to designate a state and local agency and nonprofit agency that may assist persons applying to be DISS SAH program participants.

This bill specifies that any assistance and counseling rendered by the SOS or its designees to applicants shall in no way be construed as legal advice.

This bill authorizes the SOS to adopt rules to facilitate the administration of this program by state and local agencies.

This bill requires the SOS to administer this chapter together with and in the same manner as the address confidentiality programs for domestic violence and stalking survivors.

This bill mandates the SOS to provide each DISS SAH program participant a notice in clear and conspicuous font that contains all of the following:

- The program participant is authorized by law to request to use the participant's address designated by the SOS on real property deeds, change of ownership forms, and deeds of trust when purchasing or selling a home;
- The program participant may create a revocable living trust and place their real property into the trust to protect their residential street address from disclosure in real property transactions;
- The program participant may obtain a change of their legal name to protect their anonymity;
- A list of contact information for entities that the program participant may contact to receive information on, or receive legal services for, the creation of a trust to hold real property or obtaining a name change, including county bar associations, legal aid societies, state and local agencies, or other nonprofit organizations that may be able to assist program participants.

This bill requires the SOS to submit to the Legislature, no later than January 10 of each year, a report that includes the total number of applications received for the program established by this chapter.

This bill mandates the report disclose the number of DISS SAH program participants within each county and to also describe any allegations of misuse relating to election purposes.

This bill requires the SOS to commence accepting applications for the DISS SAH program by July 1, 2027.

This bill requires the SOS to submit to the Legislature by January 1, 2030, a report that includes the total number of pieces of mail forwarded to program participants, the number of program participants during the program's duration, the average length of time a participant remains in the program, and the targeted code change needed to improve the program's efficiency and cost-effectiveness.

Online Privacy

This bill prohibits a person, business, or association from knowingly posting the home address of a DISS SAH program participant, or of the program participant's residing spouse or child, on the internet knowing that person is a DISS SAH program participant and intending to incite a third person to cause imminent great bodily harm that is likely to occur or threatening to cause imminent great bodily harm to that individual.

This bill exempts interactive computer services or access software providers, as specified in federal law, unless the service or provider intends to abet or cause imminent great bodily harm that is likely to occur or threatens to cause imminent great bodily harm to a program participant.

This bill prohibits a person, business, or association from knowingly publicly posting or publicly displaying, disclosing, or distributing on an internet website, the personal information or image of any DISS provider, employee, or volunteer, or other individual residing at the same home address, with the intent to do either of the following:

- Incite a third person to cause imminent great bodily harm to the DISS provider, employee, or volunteer identified in the posting or display, or to a co-resident of that person, where the third person is likely to commit this harm;
- Threaten the designated support services provider, employee, or volunteer identified in the posting or display, or a coresident of that person, in a manner that places the person identified or the coresident in objectively reasonable fear for their personal safety.

This bill authorizes a DISS provider, employee, or volunteer whose personal information or image is made public or any individual entity or organization authorized to act on their behalf, to do either of the following:

- Bring an action seeking injunctive or declarative relief in any court of competent jurisdiction. Authorizes a jury or court that finds that a violation has occurred to grant injunctive or declarative relief and award the successful plaintiff court costs and reasonable attorney's fees.
- Bring an action for money damages in any court of competent jurisdiction. In addition to any other legal rights or remedies, if a jury or court finds that a violation has occurred, it shall award damages to that individual in an amount up to a maximum of three times the actual damages, but in no case less than \$4,000.

This bill prohibits a person, business, or association from publicly posting, displaying, disclosing, or distributing on an internet website, the personal information or image of a DISS provider, employee, or volunteer, if that individual, or any individual, entity, or organization authorized to act on their behalf, has made a written demand of that person, business, or association to not disclose the personal information or image.

This bill mandates a written demand include a statement declaring that the individual is subject to the protection of the DISS SAH program and describing a reasonable fear for the safety of that individual or of any person residing at that individual's home address.

This bill states a demand made not to disclose the personal information or image is effective for four years, regardless of whether or not the individual's affiliation with a designated immigration support services facility has expired prior to the end of the four-year period.

This bill authorizes a DISS provider, employee, or volunteer whose personal information or image is made public as a result of a failure to honor a demand, as specified, or any individual, entity, or organization authorized to act on their behalf, to bring an action seeking injunctive or declarative relief in any court of competent jurisdiction. States that if a jury or court finds that a violation has occurred, it may grant injunctive or declarative relief and shall award the successful plaintiff court costs and reasonable attorney's fees.

This bill exempts a person or entity defined as a news organization or employee of a news organization, as specified, from the prohibitions against disclosure.

This bill prohibits a person, business, or association from soliciting, selling, or trading on the internet the personal information or image of a designated immigration support services provider, employee, or volunteer with the intent to do either of the following:

- Incite a third person to cause imminent great bodily harm to the person identified in the posting or display, or to a coresident of that person, where the third person is likely to commit this harm.
- Threaten the person identified in the posting or display, or a coresident of that person, in a manner that places the person identified or the coresident in objectively reasonable fear for their personal safety.

This bill authorizes a DISS provider, employee, or volunteer whose personal information or image is made public as a result of a failure to honor a demand not to disclose or any individual, entity, or organization authorized to act on their behalf, to bring an action in any court of competent jurisdiction. States that in addition to any other legal rights and remedies, if a jury or court finds that a violation has occurred, it shall award damages to that individual in an amount up to a maximum of three times the actual damages, but in no case less than \$4,000.

This bill exempts an internet computer service or access software provider, as defined, from liability under the requirements of this bill unless the service or provider intends to abet or cause bodily harm that is likely to occur or threatens to cause bodily harm to a designated immigration support services provider, employee, or volunteer, or any person residing at the same home address.

This bill states it is unlawful for a person to post on the internet or social media, with the intent that another person imminently use that information to commit a crime involving violence or a threat of violence against a designated immigration support services provider, employee, or volunteer, or other individuals residing at the same home address, the personal information or image of a DISS provider, employee, or volunteer, or other individuals residing at the same home address.

This bill specifies the prohibitions and penalties specified in this bill do not preclude punishment under any other provision of law.

COMMENTS

1. Need for This Bill

The author writes:

AB 2624, the Safe at Work Act strengthens protections for individuals working in immigrant service roles, including nonprofit staff, volunteers, and legal services providers, who may face risks such as doxxing, harassment, or threats due to the nature of their work. By extending the Safe at Home Program protections, the bill allows eligible participants to keep their personal information confidential in public records, helping reduce exposure to harm while supporting the continued delivery of legal, social, and humanitarian services. This proposal promotes safety, privacy, and continuity of essential services, reinforcing public confidence and ensuring that those serving communities across California can carry out their responsibilities effectively and securely.

2. Safe At Home (SAH) Program

The SAH program, created by SB 489 (Alpert, Ch. 1005, Stats. 1998) allows victims of domestic violence or stalking to apply to the SOS to request an alternate address to be used in public records. The purpose of that program is to “enable state and local agencies to respond to requests for public records without disclosing the changed name or location of a victim of domestic violence or stalking . . .” (Gov. Code, § 6205.)

The SOS is tasked with providing a substitute, publicly accessible address for these victims while protecting their actual residences or locations. The Secretary also acts as the program participants’ agent for service of process and forwards mail received at the substitute address provided.

Upon successful application, a program participant is certified to remain in the program for four years, subject to early termination or withdrawal, and must re-certify pursuant to the SOS’s renewal process if the participant wishes to continue in the program beyond the four-year enrollment period. For victims not yet of the age of majority or incapacitated persons, a parent or guardian may apply to enroll the victim into the program. Program participants may seek confidential voter status and have their residence address, telephone number, and email address declared confidential upon presentation of certification to the county elections official that the person is a participant in the SAH program. This provision makes certain public records confidential; however, the program has strict parameters around enrollment and the purpose of

the program is to provide confidentiality to its participants. California generally recognizes that public access to information concerning the conduct of the people's business is a fundamental and necessary right.¹ At the same time, the state recognizes that this right must be balanced against the right to privacy.² The general right of access to public records may, therefore, be limited when other important public policy considerations warrant such limitation.

In 2002, the SAH program was expanded to include reproductive health care services providers, employees, volunteers, and patients with the purpose of preventing potential acts of violence from being committed against providers, employees, and volunteers who assist in the provision of reproductive health care services and the patients seeking those services. (See AB 797 (Shelley) Ch. 380, Stats. 2002.) According to the SAH 2009 Legislative Report, there are 2,437 active participants in the program, and 4,974 participants have been served since the program's inception in 1999.

In 2022, as the result of AB 1131 (Newman), Chapter 554, Statutes of 2022, the SAH program for reproductive service providers, employees, volunteers and patients was expanded to include a person who is employed by or performs work pursuant to a contract with a public entity and faces threats of violence or violence or harassment from the public because of their work for the public entity. (See Gov. Code, § 6215, subd. (b).) In response to increasing threats against professionals that provide gender-affirming care the Legislature once again expanded the SAH program to capture gender-affirming health care providers, employees, or volunteers (AB 82 (Ward) Ch. 679, Stats. 2025).

Government Code section 6208.2 sets out criminal penalties for posting personal information about a person in the SAH program who is "escape from actual or threatened domestic violence, sexual assault, stalking, human trafficking, child abduction, or elder or dependent adult abuse." If a person posts personal information with the intent that another person imminently use that information to commit a crime involving violence, a threat of violence against, or to intimidate the participant or the program participant's family members who are participating in the program, that person may be punished by up to six months in county jail. If posting the personal information results in bodily injury, the person may be sentenced to up to one year in county jail.

3. Online Privacy for Reproductive Health Services Providers

In 2006, AB 2551 (Evans), Chapter 486, was enacted to address online privacy concerns for reproductive health care providers. Government Code section 6218, subdivision (a)(1) states: "No person, business, or association shall knowingly publicly post or publicly display on the Internet the home address, home telephone number, or image of any provider, employee, volunteer, or patient of a reproductive health services facility or other individuals residing at the same home address." The bill also provided reproductive health services providers, employees, volunteers, and patients the right to make a written demand for the removal of their names and addresses from any Internet website that posts or displays personal information. (Gov. Code, § 6218, subd. (b)(1) (Stat. 2006).)

In 2011, SB 636 (Corbett), Chapter 200, updated the online privacy rights to include "personally identifying information" rather than just an address and telephone number and added the following:

¹ Cal. Const., art. I, § 3; Gov. Code, § 7921.000.

² Cal. Const., art. I, § 1.

No person shall post, with the intent that another person imminently use that information to commit a crime involving violence or a threat of violence against the participant or the program participant's family members who are participating in the program on the Internet the home address, phone number, or personal identifying information of a program participant or family members who are participating in the program. A violation of this provision would be a misdemeanor, punishable by a fine of up to \$2,500, jail for up to six months, or both; violations that lead to the bodily injury of a participant or their family members would be a misdemeanor, punishable by a fine of up to \$5,000, jail up to one year, or both."

In 2021, AB 1356 (Bauer-Kahan), Chapter 191, Statutes of 2021, substantially increased, the criminal penalty for posting personal identifying information online from a misdemeanor to an alternate felony-misdemeanor punishable by either one year as a misdemeanor or 16 months, or two or three years as a county jail/state prison felony, a fine of up to \$10,000, or both that fine and imprisonment. If bodily injury occurs, the penalty was a straight felony punishable by 16 months, two, or three years in either state prison or county jail, a fine of up to \$50,000, or both that fine and imprisonment.

4. First Amendment True Threats

This bill has the same First Amendment concerns as its reproductive health care counterpart. First Amendment doctrine has evolved in the internet age to what is known as the "true threats" test.

The First Amendment to the United States Constitution provides that, "Congress shall make no law . . . abridging the freedom of speech." (U.S. Const., 1st Amend.) The California Constitution also protects free speech. "Every person may freely speak, write and publish his or her sentiments on all subjects, being responsible for the abuse of this right. A law may not restrain or abridge liberty of speech or press." (Cal. Const., art. I, § 2.) "[A]s a general matter, the First Amendment means that government has no power to restrict expression because of its message, its ideas, its subject matter, or its content." (*Ashcroft v. American Civil Liberties Union* (2002) 535 U.S. 564, 573.)

"To achieve First Amendment protection, a plaintiff must show that [they] possessed: (1) a message to be communicated; and (2) an audience to receive that message, regardless of the medium in which the message is to be expressed." (*Montesfusco v. Nassau County* (1999) 39 F.Supp. 2d 231, 242; see also *Hurley v. Irish-American Gay, Lesbian & Bisexual Group* (1995) 515 U.S. 557.) Legislation that regulates the content of protected speech is subject to strict scrutiny, sometimes referred to by the courts as "exacting scrutiny" in this context. (*Reed v. Town of Gilbert, Ariz.* (2015) 135 S.Ct. 2218, 2226.) To survive strict scrutiny, state action must be narrowly tailored to address a compelling government interest. (*Ibid.*) However, true threats of violence are outside the bounds of First Amendment protection and punishable as crimes. (See generally, *Brandenburg v. Ohio* (1969) 395 U.S. 444, 447; *Virginia v. Black* (2003) 538 U.S. 343, 359.)

True threats are defined by the court as "serious expression[s]" conveying that a speaker means to "commit an act of unlawful violence." (See *Black*, 538 U. S., at p. 359.) Whether the speaker is aware of, or intends to convey, the threatening aspect of the message is not part of what makes a statement a threat. (See *Elonis v. United States* (2015) 575 U. S. 723, 733.). The existence of a

threat depends not on “the mental state of the author,” but on “what the statement conveys” to the person on the other end. (*Ibid.*)

Most recently, in *Counterman v. Colorado*, the U.S. Supreme Court refined the true threats test in determining whether the state must show a subjective understanding by the defendant that the statements constituted a threat. The Court held the state must show the defendant’s subjective intent to threaten in order to impose criminal penalties, however, a showing of a mental state of recklessness is sufficient. (See *Counterman v. Colorado* (2023) 143 S.Ct. 2106, 2112.)

“Again, guided by our precedent, we hold recklessness standard is enough. Given that a subjective standard here shields speech not independently entitled to protection – and indeed posing real dangers – we do not require that the State prove the defendant had any more specific intent to threaten the victim.” (*Counterman*, supra, at 143 S.Ct. at 2113.)

While threats of violence are clear exceptions to the First Amendment, this bill makes it unlawful to post on the internet, with the intent to incite another person imminently to use that information to commit a crime involving violence or a threat of violence against a DISS provider, employee, or volunteer or other individuals residing at the same address. Notably, this bill does not impose criminal penalties for such conduct, and so under existing law, it is likely that the mental state of the defendant is irrelevant.

5. Effect of This Bill

Reports indicate that those working for or with organizations providing services to immigrant communities are being increasingly targeted with harassment and threats.³ This bill is intended to address this issue by expanding the SAH program to, and expanding online privacy protection for, DISS providers.

a. Safe at Home (SAH) Program

First, this bill expands the SAH program to “designated immigration support services (DISS) providers, employees, or volunteers,” which means a person who provides, assists in providing, or receives immigration support services at a designated immigration support services facility. Eligible facilities include locations where immigration support services are provided, including nonprofit organizations offices, DOJ-recognized entities, community legal clinics, law offices, accredited representative sites that provide immigration legal services, and health care facilities.

This bill makes it a misdemeanor to knowingly falsify certain statements in an application for the DISS SAH program. A person who knowingly and falsely states that the DISS facility or any of its providers, employees, or volunteers is or was the target of threats, harassment, or acts of violence or harassment within one year of the date of the application, is guilty of a misdemeanor.

Similarly, under this bill, a person who falsely attests in an application that disclosure of the applicant’s address would endanger the applicant’s safety or the safety of the applicant’s family or the minor or incapacitated person on whose behalf the application is made, is guilty of a

³ See Miriam Jordan, *Faith-Based Groups That Assist Migrants Become Targets of Extremists* (June 2, 2024) The New York Times, <<https://www.nytimes.com/2024/06/02/us/migrants-charities-shelters-threats.html#:~:text=San%20Diego%2C%20Catholic,echoing%20it%20themselves>> [as of June 21, 2026].

misdemeanor. This provision, unlike the other misdemeanors in this bill, does not have a knowledge requirement. The author and Committee may consider including a requirement that the false statement be made knowingly, to avoid punishing people who make false statements inadvertently or negligently.

b. Online Privacy Protections

Second, this bill expands existing online privacy protections to reproductive health service providers to include DISS providers, employees, or volunteers. Specifically, this bill prohibits a person, business, or association from knowingly posting the home address, personal information, or image of a DISS SAH program participant, or of the program participant's residing spouse or child, on the internet knowing that person is a DISS SAH program participant and intending to incite a third person to cause imminent great bodily harm that is likely to occur or threatening to cause imminent great bodily harm to that individual.

This bill authorizes a DISS provider, employee, or volunteer whose personal information or image is made public or any individual entity or organization authorized to act on their behalf, to do either of the following:

- Bring an action seeking injunctive or declarative relief in any court of competent jurisdiction. The bill authorizes a jury or court that finds that a violation has occurred to grant injunctive or declarative relief and award the successful plaintiff court costs and reasonable attorney's fees.
- Bring an action for money damages in any court of competent jurisdiction. In addition to any other legal rights or remedies, if a jury or court finds that a violation has occurred, it shall award damages to that individual in an amount up to a maximum of three times the actual damages, but in no case less than \$4,000.

This bill additionally prohibits a person, business, or association from publicly posting, displaying, disclosing, or distributing on an internet website, the personal information or image of a DISS provider, employee, or volunteer, if that individual, or any individual, entity, or organization authorized to act on their behalf, has made a written demand of that person, business, or association to not disclose the personal information or image.

Notably, unlike existing protections for reproductive health service providers, this bill does not impose criminal penalties for posting the personal information of a DISS provider. As discussed above, under existing law, posting the personal information of a reproductive health services provider is a misdemeanor. This bill provides only civil remedies for violations of its provisions.

6. Argument in Support

The California Immigrant Policy Center writes:

Immigrant support providers, whether working in legal assistance, advocacy, education or community support, are operating under heightened risk in the current political climate. Many have experienced harassment, threats, doxxing, and targeted intimidation due to their work. These incidents have escalated significantly in recent years and are likely to continue given the current climate surrounding immigration policy. Such threats jeopardize the safety of advocates

and staff and disrupt the vital services they provide to immigrant communities. Advocates and staff should not have to fear that sensitive personal information, such as their home addresses, can be weaponized against them by anti-immigrant vigilantes.

Currently, the law does not offer these individuals the same confidentiality protection that exists for other groups under the Safe at Home Program, leaving them at risk of danger. AB 2624 addresses this gap by allowing those serving immigrant populations to access the critical privacy safeguards, helping them work without fear for their safety. The Safe at Home Program has a long history of protecting people in vulnerable situations. Originally designed for survivors of domestic violence, it has been expanded over the years to include victims of stalking, reproductive health workers, and gender-affirming health care providers. AB 2624 extends these protections to the immigration services sector, ensuring that personal information remains confidential and that threats of harassment can be legally addressed under existing civil and criminal frameworks.

7. Argument in Opposition

The California Family Council writes:

This bill extends California's address confidentiality program to employees and volunteers of immigration services organizations, many of which receive substantial government funding. Organizations that administer public money do not carry the same privacy expectations as private citizens. Wrapping these entities in a legal secrecy shield removes a fundamental check on how taxpayer dollars are spent.

The bill's prohibition on posting personal information or images online, using a "reasonable fear" intent standard, is dangerously vague. Courts have consistently held that publishing truthful information about matters of public concern receives strong First Amendment protection. The bill's \$10,000 per-violation penalty structure creates precisely the chilling effect on protected speech and investigative journalism that the Constitution does not permit.

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