

April 13, 2026

The Honorable Maggy Krell  
California State Assembly, District 6  
1021 O Street, Suite 5630  
Sacramento, CA 95814

Dear Assembly Member Krell:

On behalf of tens of thousands of constituents, allied organizations, and more than 2,000 churches across California, California Family Council strongly **opposes** AB 1854.

AB 1854 dramatically expands California's existing legal shield for abortion providers and for those performing sex-rejecting procedures on minors, extending protections not only to activities performed within California, but to those performed in other states entirely.<sup>1</sup> Current law already bars California law enforcement from cooperating with out-of-state investigations into activities deemed "legally protected health care." This bill goes further: it prohibits any California-based person or entity from complying with a civil, criminal, or regulatory subpoena related to these activities unless strict conditions are met, including a sworn affidavit, notification to the Attorney General within seven days, and a mandatory thirty-day waiting period. Violations carry civil penalties of \$10,000 for a first offense and \$15,000 for each subsequent offense, enforced by the Attorney General. This is not a shield law. It is a sword, punishing Californians and California businesses for complying with lawful legal process from other jurisdictions.

### **AB 1854 Puts California-Based Organizations in an Impossible Legal Position**

Any California-headquartered organization, including faith-based nonprofits, counseling ministries, and employers, that receives a lawful subpoena from another state touching on a "legally protected health care activity" is required by this bill to refuse compliance or face substantial financial penalties. This creates a direct and irreconcilable conflict of laws, forcing Californians to choose between violating California law and violating another state's lawful legal process. No person or organization should face government-imposed fines for cooperating with a legitimate investigation. This provision alone warrants defeat of the bill.

The bill also weaponizes the Governor's extradition authority. If the Governor declines to surrender an individual in connection with these activities, no state or local law enforcement officer may participate in that person's arrest. California is effectively granting a class of providers unilateral immunity from accountability in any jurisdiction.

### **The Bill Shields Sex-Rejecting Procedures Despite Clear Evidence of Harm**

AB 1854's definition of "legally protected health care activity" encompasses sterilizing hormone therapies and mutilating surgeries performed on minors under the banner of gender transition. A recently published study from Finland provides serious empirical grounds for concern about these interventions.<sup>2</sup> This nationwide study of over 2,000 adolescents found that psychiatric morbidity among youth referred for gender identity services was dramatically higher than their peers both before and after medical intervention. Notably, mental health challenges did not

improve following medical gender reassignment; instead, psychiatric morbidity remained elevated or increased over time.

This finding directly contradicts the common claim that these interventions resolve underlying distress. Instead, it suggests that vulnerable young people require comprehensive psychological care, not irreversible medicalization.

Rather than allowing other states' legal systems to investigate and hold accountable those who perform these irreversible procedures on children, this bill would require California to obstruct those investigations. Parents in other states who are fighting to protect their children from permanent harm will find California standing in their way. Legislation designed to shield providers of sex-rejecting procedures from legal scrutiny, at precisely the moment that peer-reviewed research is raising alarms about their safety, is not sound health policy. It is a legislative firewall protecting an industry from accountability.

The constitutional concerns are equally serious. By extending California's protections to activities occurring outside its borders, AB 1854 raises direct conflicts with the Full Faith and Credit Clause, the Supremacy Clause, and foundational principles of cooperative federalism. Imposing civil penalties on individuals for complying with lawful legal process from sister states raises fundamental due process concerns. If California can declare that its policy preferences override another state's criminal laws, even when the activity in question occurred on that other state's soil, then interstate comity is effectively finished.

The trajectory of this legislation is unmistakable. Beginning with AB 1666 in 2022, continuing through Proposition 1 and SB 107, and now escalating with AB 1854, Sacramento has pursued a systematic strategy of transforming California into a national sanctuary for abortion and sex-rejecting procedures, insulating providers from accountability at every turn and pushing that insulation further with each session.<sup>1</sup> AB 1854 is the next and most aggressive step in that escalation.

For these reasons, California Family Council respectfully **opposes** AB 1854. We urge you to reject this bill and instead advance policies that protect children, respect the lawful authority of every state, and hold providers accountable for the harm they cause.

Respectfully,



Greg Burt  
Vice President  
California Family Council

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#### References

<sup>1</sup> California State Legislature, "AB 1854 — Legally Protected Health Care Activities," Bill Text and Version History, 2025-2026 Session. [https://leginfo.legislature.ca.gov/faces/billVersionsCompareClient.xhtml?bill\\_id=202520260AB1854&cversion=20250AB185498AMD](https://leginfo.legislature.ca.gov/faces/billVersionsCompareClient.xhtml?bill_id=202520260AB1854&cversion=20250AB185498AMD)

<sup>2</sup> Finnish Study on Sex-Rejecting Procedures, Research on Harms of Gender-Affirming Care, 2025. [https://drive.google.com/file/d/1RIJjgzbdllk\\_qfBynsyFJSOEWdlmcdvO/view?usp=sharing](https://drive.google.com/file/d/1RIJjgzbdllk_qfBynsyFJSOEWdlmcdvO/view?usp=sharing)