



SENATOR SHANNON GROVE
SENATE DISTRICT 12

SB 1070 (Grove)
Safeguarding Places of Worship in California

SUMMARY

This bill strengthens protections for places of religious worship by expanding penalties for intentionally disrupting services. With coordinated and increasingly aggressive interference with religious gatherings occurring across California and nationwide, the bill ensures that houses of worship are treated as sacred spaces worthy of First Amendment protections. It safeguards the constitutional rights to free exercise of religion and peaceful assembly while allowing courts to impose proportionate penalties for serious or repeated disruptions.

EXISTING LAW

Current law makes it a misdemeanor to intentionally disturb or disquiet an assemblage of people at a tax-exempt place of worship through profane discourse, rude or indecent behavior, or unnecessary noise. Penalties are limited to a fine of up to \$1,000, up to one year in county jail, or both, regardless of the severity, duration, or coordination of the conduct.

Under U.S. law, places of worship are private property, even when open to the public for religious services. Property owners retain the right to set rules for conduct and to remove individuals who interfere with worship. The U.S. Supreme Court has held that private property does not become a public forum merely because it is open to the public. Courts applying this principle to churches have recognized that speech protected outside a church building does not automatically enjoy the same protection inside a sanctuary during worship. Laws prohibiting intentional disruptions regulate conduct, not viewpoint, and protect the constitutional rights of worshippers to freely exercise religion and assemble peacefully.

PROBLEM

Across California, places of worship are increasingly being targeted for intentional disruptions during religious services. A national report documented more than 415 hostile acts against churches in 2024, with California reporting the highest number in the nation at 40 incidents. These acts extend well beyond peaceful protest on public sidewalks and include obstruction,

intimidation, and deliberate interference inside sanctuaries and at points of access.

Recent California examples include:

- **September 7, 2025 – San Diego County (Christian and Jewish Alliance):** Agitators blocked entrances, used high-decibel sirens for three hours, shouted hostile slogans, and intimidated congregants. One attendee was pushed into a busy street. Worship was disrupted and law enforcement intervened.
- **March 19, 2025 – Carlsbad (The Mission Church):** Agitators posed as attendees, shouted hostile epithets, and interrupted prayers. Outside, amplified sound devices prevented congregants from hearing or participating in worship.
- **March 1, 2025 – Los Angeles (Adas Torah Synagogue):** A violent mob used intimidation and obstruction to prevent congregants from accessing the synagogue.

SOLUTION

This bill creates a wobbler offense for intentional disruptions of religious worship, allowing courts to charge serious, coordinated, or repeated disturbances as a felony while preserving misdemeanor penalties for less severe conduct. Felony penalties include a fine of up to \$5,000, county jail for 16 months, two years, or three years, or both. This approach recognizes the special nature of places of worship, increases deterrence, and gives courts the flexibility to impose fair punishments that protect both public safety and worshippers' rights.

WEBSITE

ProtectWorship.com

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