

SENATE JUDICIARY COMMITTEE
Senator Thomas Umberg, Chair
2025-2026 Regular Session

AB 2534 (Kalra)
Version: June 11, 2026
Hearing Date: June 23, 2026
Fiscal: Yes
Urgency: No
AWM

SUBJECT

Domestic Violence Prevention Act: forced marriage

DIGEST

This bill adds “forced marriage,” as defined, to the list of abusive conduct constituting domestic violence under the Domestic Violence Prevention Act (DVPA) and clarifies that a person may obtain a DVPA order to protect against a forced marriage.

EXECUTIVE SUMMARY

Existing law, the DVPA, seeks to prevent acts of domestic violence, abuse, and sexual abuse and to provide for a separation of persons involved in the domestic violence for a period sufficient to enable these persons to try to resolve the causes of the violence. Existing law thus enables a party to seek a restraining order or a protective order to enjoin specific acts of abuse, exclude a person from a dwelling, or enjoin other specified behavior. The DVPA allows a victim of domestic violence to obtain a short-term temporary restraining order (TRO) on an ex parte basis and a longer-term protective order after a noticed hearing (DVPO); these orders are generally sought in a single application that seeks the immediate issuance of a TRO and a hearing on the application for the protective order.

This bill clarifies that the DVPA extends to protect against a planned forced marriage and to protect victims of forced marriages that have already taken place. At a high level, forced marriage is already covered by the DVPA through prohibitions on violence, threats of violence, and coercive control, but this bill adds both clarity and guidance to the courts on the potential scope of a forced-marriage-related DVPA order. The author recently took amendments to address stakeholder concerns; the organizations that had expressed those concerns are now in support of the bill.

This bill is sponsored by the Family Violence Law Center and Tahiri Justice Center and is supported by the California Family Council, the California Partnership to End

Domestic Violence, the County of Santa Clara, the Family Violence Appellate Project, Maitri Bay Area, Planned Parenthood Affiliates of California, Restraining Orders Without Borders, the Sexual Assault Advocacy Network, and Valor US. The Committee has not received timely opposition to this bill.

PROPOSED CHANGES TO THE LAW

Existing law:

- 1) Establishes the DVPA, which sets forth procedural and substantive requirements for the issuance of a temporary restraining order or a protective order to, among other things, enjoin specific acts of abuse or prohibit the abuser from coming within a specified distance of the abused person. (Fam. Code, §§ 6200 et seq.)
- 2) Defines “domestic violence” as abuse perpetrated against a spouse or former spouse; a cohabitant or former cohabitant; a person with whom the respondent is having or has had a dating or engagement relationship; a person with whom the respondent has had a child, as specified; a child of a party or a child who is the subject of an action under the Uniform Parentage Act, as specified; or any other person related by consanguinity or affinity within the second degree. (Fam. Code, § 6211.)
- 3) Authorizes a court to issue an ex parte temporary restraining order (TRO) under the DVPA without a noticed hearing. (Fam. Code, §§ 6320-6327.)
- 4) Authorizes a court to issue DVPO under the DVPA after a noticed hearing at which the alleged abuser may appear. (Fam. Code, §§ 6340-6347.)
- 5) Provides that an order issued under 3) or 4) may enjoin a party from molesting, attacking, striking, stalking, threatening, sexually assaulting, battering, credibly impersonating, falsely impersonating, harassing, telephoning, destroying personal property, contacting, coming within a specified distance of, or disturbing the peace of the other party, and, at the discretion of the court, on a showing of good cause, of other named family or household members. (Fam. Code, § 6320(a).)
- 6) Provides that “disturbing the peace of the other party,” for purposes of 5), refers to conduct that, based on the totality of the circumstances, destroys the mental or emotional calms of the other party.
 - a) This conduct may be committed directly or indirectly, including through the use of a third party.
 - b) This conduct may be committed through any method or through any means including, but not limited to, telephone, online accounts, text messages, internet-connected devices, or other electronic technologies.

- c) This conduct includes, but is not limited to, coercive control, which is a pattern of behavior that in purpose or effect unreasonably interferes with a person's free will or personal liberty. (Fam. Code, § 6320(c).)
- 7) Provides that examples of coercive control include, but are not limited to, unreasonably engaging in any of the following:
- a) Isolating the other party from friends, relatives, or other sources of support.
 - b) Depriving the other party of basic necessities.
 - c) Controlling, regulating, or monitoring the other party's movements, communications, daily behavior, finances, economic resources, or access to services.
 - d) Compelling the other party by force, threat of force, or intimidation, including threats based on actual or suspected immigration status, to engage in conduct from which the other party has a right to abstain, or to abstain from conduct in which the other party has a right to engage.
 - e) Engaging in reproductive coercion, which consists of control over the reproductive autonomy of another through force, threat of force, or intimidation, and may include, but is not limited to, unreasonably pressuring the other party to become pregnant, deliberately interfering with contraception use or access to reproductive health information, or using coercive tactics to control, or attempt to control, pregnancy outcomes. (Fam. Code, § 6320(c)(1)-(5).)
- 8) Provides that a marriage is voidable and may be adjudged a nullity if specified conditions existed at the time of the marriage, including that the consent of either party was obtained by force, unless the party whose consent was obtained by force afterwards freely cohabitated with the other as their spouse. (Fam. Code, § 2210(e).)
- 9) Provides that a proceeding to obtain a judgment of nullity of marriage for a marriage in which consent was obtained by force must be brought:
- a) Until January 1, 2027, within four years after the marriage.
 - b) Beginning January 1, 2027, within four years of the marriage, except that the court, upon a showing of good cause, may permit a party to proceed with the petition outside the expiration of the four-year statute of limitations. (Fam. Code, § 2211; AB 1134 (Bains, Ch. 633, Stats. 2025).)
- 10) Provides that it is a crime to compel another person, unlawfully, against their will, and by force, menace, or duress, to marry them or to marry another person, regardless of the age of the victim of the forced marriage at the time of the forced marriage. (Pen. Code, § 265.)

This bill:

- 1) Makes the following findings and declarations:

- a) Forced marriage is a form of abuse and coercive control that falls within the protective purposes of the DVPA; this bill clarifies that courts may issue restraining orders to prevent, enjoin, and remedy forced marriage using existing DVPA procedures and penalties.
 - b) Forced marriage, in all its forms, is a pervasive issue in this state and a violation of fundamental human rights.
 - c) Anyone, regardless of race, ethnicity, color, sex, gender identity or expression, sexual orientation, education, socioeconomic status, marital status, relationship to the perpetrator, immigration or citizenship status, language proficiency, veteran or military status, or disability, may be a victim of forced marriage.
 - d) Forced marriage harms not only victims but also their families, communities, and society at large.
 - e) Victims of forced marriage deserve full protection and relief under California law.
 - f) The purposes of this measure are to prevent acts of forced marriage and related coercive conduct and to remedy their effects on victims and communities through timely and effective civil protection; this measure is intended to protect individuals from being forced into marriage or from attempts, threats, or preparations to compel marriage, and to provide relief to those seeking to escape or recover from that coercion.
- 2) Adds, to the definition of “domestic violence” within the DVPA, abuse perpetrated against a party subjected to a forced marriage or an attempted forced marriage.
 - 3) Defines “forced marriage” as a spousal relationship in which one or both parties do not or cannot consent and one or both parties are compelled, through force, fraud, coercion, duress, abuse of power, or coercive control, to enter, attempt to enter, or maintain a marriage, regardless of whether the marriage is legally valid; “forced marriage” constitutes abuse for purposes of the DVPA.
 - 4) Provides that, if a DVPA order is sought to protect against a forced marriage, every person who engaged in conduct to arrange, officiate, finance, or facilitate the forced marriage or attempted force marriage may be included in one action as respondents.
 - 5) Requires the DVPA to be liberally construed, and states that relief shall not be denied on the basis that the conduct is claimed to be customary, religious, cultural, or lawful in another jurisdiction, and that passage of time alone shall not bar relief.
 - 6) Permits a court to grant a DVPA order regardless of whether a marriage has occurred or whether a purported marriage would be legally valid in this state or another jurisdiction.

- 7) Adds, to the list of examples of coercive control, interfering with, threatening, or attempting to prevent a party or witness from participating in court proceedings.
- 8) Provides that conduct taken to compel, attempt to compel, prepare for, or facilitate a forced marriage constitutes disturbing the peace of the other party; such conduct includes, but is not limited to:
 - a) Threats, intimidation, harassment, or abuse targeted at a person in an attempt to secure a marriage without consent.
 - b) Confiscating, withholding, or controlling passports, visas, identity documents, or travel documents.
 - c) Isolation, surveillance, restriction of movement or communication, or financial control.
 - d) Arranging, officiating, financing, or facilitating a forced marriage ceremony or related travel.
- 9) Provides that, in a DVPA case involving forced marriage or a credible risk of forced marriage, the court may issue an order otherwise authorized under the DVPA, including, but not limited to:
 - a) An order prohibiting the arrangement, solemnization, or facilitation of a marriage involving the protected party without the party's consent.
 - b) An order requiring the surrender to the court or return of passports, visas, or other travel or identity documents necessary to prevent removal of the protected party.
 - c) An order necessary to ensure that a person is not removed from school or prevented from attending school, a medical or mental health appointment, a meeting with a service provider or attorney, an extracurricular activity, or other conduct to which the protected party has a right to engage.
 - d) An order necessary to prevent the transportation of a person outside the jurisdiction for purposes related to a forced marriage.

COMMENTS

1. Author's comment

According to the author:

AB 2534 is a critical piece of legislation that will extend domestic violence protections for individuals being forced into a marriage or survivors of forced marriages. Victims of forced marriage often experience abuse, isolation, financial control, surveillance, and immigration threats from the perpetrator and extended family. In these cases, the perpetrator does not act alone, and coercion is often reinforced by family members or community members.

While forced marriages are a crime under existing law, many victims find themselves in dangerous situations without protective measures. By giving the ability to file a restraining order against their perpetrator and others aiding in this process, AB 2534 will empower survivors to take steps that can better ensure their safety and protect them from those forcing them into a nonconsensual marriage.

2. Background on the DVPA

The DVPA seeks to prevent acts of domestic violence, abuse, and sexual abuse, and to provide for a separation of persons involved in domestic violence for a period sufficient to enable them to seek a resolution. The DVPA's "protective purpose is broad both in its stated intent and its breadth of persons protected" and courts are required to construe it broadly in order to accomplish the statute's purpose.¹

The DVPA allows a victim of domestic violence to obtain a short-term TRO on an ex parte basis and a DVPO after a noticed hearing;² these orders are generally sought in a single application that seeks the immediate issuance of a TRO and a hearing on the application for the DVPO. A TRO or a DVPO can enjoin a range of conduct, including attacking, threatening, harassing, telephoning, contacting, and coming within a specified distance of the protected person.³ Both a TRO and a DVPO can be issued solely on the basis of the affidavit or testimony presented by the petitioner.⁴ A TRO generally lasts for 21 days, by which point the court must hold a noticed hearing on the issuance of a DVPO; however, the TRO may be extended if there is good cause for continuing the noticed hearing.⁵ If the court grants the application for a DVPO, the DVPO can last for up to five years and can be extended by the court so long as the risk of abuse remains.⁶

The DVPA defines "abuse" broadly, covering physical harms, harm to property, and emotional harm arising from behavior such as stalking, harassing, and disturbing the peace.⁷ In 2020, the Legislature enacted SB 1141 (Rubio, Ch. 248, Stats. 2020), which codified caselaw holding that "disturbing the peace" includes "coercive control."⁸ As explained by Dr. Evan Stark, a leading expert on coercive control:

Coercive control entails a malevolent course of conduct that subordinates women to an alien will by violating their physical integrity (domestic

¹ *Caldwell v. Coppola* (1990) 219 Cal.App.3d 859, 863; *In re Marriage of Nadkarni* (2009) 173 Cal.App.4th 1483, 1498.

² Fam. Code, §§ 6320, 6340.

³ *Id.*, §§ 6320, 6340.

⁴ *Id.*, § 6300(a).

⁵ *Id.*, §§ 242, 245.

⁶ *Id.*, § 6345.

⁷ *Id.*, § 6320(a).

⁸ See Sen. Com. on Judiciary, Analysis of Sen. Bill No. 1141 (2019-2020 Reg. Sess.) as amended May 6, 2020, p. 5.

violence), denying them respect and autonomy (intimidation), depriving them of social connection (isolation) and appropriating or denying them access to the resources required for personhood and citizenship (control).⁹

In 2021, the Legislature enacted SB 374 (Min, Ch. 135, Stats. 2021), which added “reproductive coercion” to the list of conduct that can constitute coercive control. “Reproductive coercion” is a prevalent form of abuse through which the abuser exerts “control over the reproductive autonomy of another through force, threat of force, or intimidation.”¹⁰

3. The problem of forced marriage in California

A legal marriage in California requires the consent of two persons capable of giving consent; the issuance of a license; and the solemnization of the marriage by a person authorized to do so.¹¹ A solemnized marriage in which one or both parties’ consent was obtained by fraud or force, or in which one or both parties was a minor who did not receive express approval from the court, is voidable and can be declared a nullity by the court.¹² Forcing a person into a marriage against their will, through force, menace, or duress, is also a crime.¹³

Despite these laws, forced marriage is still a problem in California and around the world:

Forced marriages often include elements of familial pressures, manipulation of religion, and/or cultural pressures. Familial, cultural or religious pressure are often used to manipulate victims of forced marriage, resulting in guilt or shame that limits their ability to speak up, report their experience, or seek help. Particularly in Western countries, the question of whether a marriage is forced has become muddled, where girls facing pressure to marry the father of their child due to fear of a child being born out of wedlock is seen simply as allowing the union to start on a strong foundation.¹⁴

⁹ Tucker, *Domestic Violence as a Factor in Child Custody Determinations: Considering Coercive Control* (May 2022) 90 *Fordham L. Rev.* 2673, 2676 (internal quotation marks omitted).

¹⁰ Fam. Code, § 6320(c)(5); e.g., Saravi, *Addressing Abusers’ Attack on Women’s Right to Reproductive Autonomy: Birth Control Sabotage* (Apr. 2020) 23 *Rich. Pub. Int. L. Rev.* 91, 94.

¹¹ Fam. Code, § 300.

¹² *Id.*, §§ 2210, 2211. Beginning in 2027, parties whose consent was obtained by force will have additional time in which to bring a petition for nullity of marriage, upon a showing of good cause. (See AB 1134 (Bains, Ch. 633, Stats. 2025).)

¹³ Pen. Code, § 265.

¹⁴ Birga, Khan, & Owens, *Hidden Costs of Forced Marriage and Its Impact on Women and Girls Globally* (2024) Family Violence Law Center, p. 7, available at https://fvlc.org/wp-content/uploads/2024/10/FVLC-Report_10.1.pdf. All links in this analysis are current as of June 18, 2026.

Millions of minors are forced into marriages every year across the world; “[f]orced marriage of minors exacerbates the human rights offense [of forced marriage] as it adds on statutory rape, early child bearing, prevents a child from completing secondary education, and sets a child on the path to life-long poverty and victimization.”¹⁵ And in some communities, girls are taught that they have no agency to decide whether, and whom, to marry, and face ostracism and poverty if they refuse their parents’ chosen husband; though the actual marriage might not take place until she is legally of age, her “consent” is often the product of a combination of coercive control, violence or threats of violence, and a feeling that she has no other options.¹⁶

Californians can also find themselves forced into marriages abroad, in countries where there are fewer protections against forced marriage. “It is all too common for American citizens to return to their family's country of origin under the pretext of visiting family only to be held against their will until they agree to marry someone their family chose.”¹⁷ California is also home to persons who were forced into marriages abroad, or in other states, before moving to California.¹⁸ California’s out-of-state marriage law recognizes marriages that are valid under the laws of the jurisdiction where the marriage was solemnized,¹⁹ so a person forced into a marriage in a country where forced marriage is illegal would have recourse under California law. The onus is, however, still on the victim to reach out for help – California does not preemptively investigate the validity of its residents’ marriages.

4. This bill clarifies that the DVPA’s protections extend to forced marriage

As noted by the author and sponsors, perpetrators of forced marriage are typically the victim’s family members and/or the putative spouse themselves (though sometimes both parties to the marriage are forced into it), and therefore clearly fall within the categories of persons who can commit domestic violence for purposes of the DVPA.²⁰ Similarly, forced marriage generally involves violence, the threat of violence, and coercive control, all of which are already covered by the DVPA.²¹ A court could, therefore, presumably issue a DVPA order on the basis of forced marriage, or an attempted forced marriage, under existing law.

That said, there are elements of forced marriage that make it dissimilar to what might be characterized as “traditional” domestic violence types. For example, the DVPA does not provide a straightforward remedy for a victim of a multi-party campaign of

¹⁵ *Id.* at p. 9.

¹⁶ Valencia, ‘Trapped’: The American women and girls forced into marriage (Dec. 24, 2020) Al Jazeera, <https://www.aljazeera.com/features/2020/12/24/america-women-and-girls-forced-into-marriage>.

¹⁷ *Id.* at p. 8.

¹⁸ *E.g., id.* at p. 9.

¹⁹ Fam. Code, § 308.

²⁰ *Id.*, § 6211.

²¹ *Id.*, § 6320.

coercive control, which could make a court reluctant to grant an order that seeks protection against a victim's parents and putative future spouse.

To cure any potential ambiguity, this bill expressly includes forced marriage within the ambit of abusive conduct covered by the DVPA. The bill also provides courts with guidance on the potential scope of DVPA orders arising from an attempted forced marriage, or a forced marriage that has already been solemnized. Under the bill, the court can make a broad range of orders to protect against a planned or solemnized forced marriage, including an order to prohibit a marriage from going forward; an order for the surrender of the victim's travel documents; or an order directed towards all of the individuals involved in the planned or solemnized forced marriage.

Given the range of forced marriage experiences, the bill casts a wide net. "Forced marriage" includes marriages that are conducted through the state's license system as well as "marriages" that are solemnized without state involvement, such as a "religious-only" marriage officiated by a faith leader in the victim's community. "Forced marriage" also includes a marriage that is, or is intended to be, conducted in another jurisdiction, including another country. To be clear, a DVPA order to protect a forced marriage victim who was married in another country would not invalidate the marriage – the victim would still have to go through a separate process to void the marriage – so there is no concern that this provision interferes with full faith and credit requirements. The protective order would, however, keep the victim safe from their abusers, thereby giving them the space they need to begin the nullification process and take whatever additional steps they need to begin to heal.

The author recently took amendments to address stakeholder concerns; the entities who had expressed those concerns are now in support of the bill.

5. Arguments in support

According to the Tahiri Justice Center:

Forced marriage is a serious violation of human rights that often involves physical violence, sexual assault, and confinement. Without the specific protections provided by AB 2534, many survivors are left without a clear legal pathway to prevent these harms before they occur or to escape a forced marriage after it has happened. The need for this bill is underscored by several alarming data points:

- A Pervasive but Hidden Crisis: Between 2009 and 2011, the Tahiri Justice Center – a sponsor of this bill – received reports of nearly 3,000 known or suspected cases of forced marriage in the United States.
- Many of these cases involved minors and young adults who were unable to access traditional legal remedies. Within this data were confirmed cases in California.

- **The Threat of International Abduction:** Forced marriage often involves "vacationing" survivors to other countries where they have fewer legal rights. According to the U.S. Department of State, once a survivor is taken across international borders and married, the ability of the U.S. government to intervene is severely limited. AB 2534 provides the preemptive, emergency authority needed to stop such an abduction before it begins.
- **Coercive Control and Overlapping Abuse:** Research indicates that forced marriage is rarely an isolated incident; it is almost always accompanied by coercive control, including financial abuse, physical threats, and reproductive coercion. Current California law does not explicitly list forced marriage as a basis for a Domestic Violence Restraining Order (DVRO), making it difficult for courts to provide comprehensive relief to these survivors.
- **Safety Upon Separation:** Data shows that separation is the most dangerous time for victims of domestic violence. For those attempting to flee a forced marriage, this risk is heightened by the involvement of extended family or community actors who may aid in the abuse and coercion and make it even harder to find a safe pathway out.
- AB 2534 provides survivors with a robust "shield" by allowing the court to restrain every person involved in facilitating a forced marriage simultaneously to protect against these uniquely risky and harmful dynamics present in forced marriage cases.

SUPPORT

Family Violence Law Center (co-sponsor)
Tahirih Justice Center (co-sponsor)
California Family Council
California Partnership to End Domestic Violence
County of Santa Clara
Family Violence Appellate Project
Maitri Bay Area
Planned Parenthood Affiliates of California
Restraining Orders Without Borders
Sexual Assault Advocacy Network
Valor US

OPPOSITION

None received

RELATED LEGISLATION

Pending legislation: None known.

Prior legislation:

AB 1134 (Bains, Ch. 633, Stats. 2025) updated the crime of coerced marriage and authorized, beginning January 1, 2027, a court to grant permission, upon a showing of good cause, for a party to proceed with a petition for nullity of marriage that is filed beyond the relevant filing period if the party's consent to the marriage was obtained by force.

SB 374 (Min, Ch. 135, Stats. 2021) added "reproductive coercion" to the list of conduct that constitutes coercive control under the DVPA. SB 374 is discussed further in Part 2 of this analysis.

SB 1141 (Rubio, Ch. 248, Stats. 2020) codified caselaw recognizing that "disturbing the peace of another party" within the DVPA includes coercive control, as defined. SB 1141 is discussed further in Part 2 of this analysis.

PRIOR VOTES

Assembly Floor (Ayes 69, Noes 0)
Assembly Appropriations Committee (Ayes 13, Noes 0)
Assembly Judiciary Committee (Ayes 12, Noes 0)
