



Honorable Nick Schultz
Chair Assembly Committee on Public Safety, State of California
California State Capitol
Sacramento, CA 95814

Honorable Juan Alanis
Vice-Chair Assembly Committee on Public Safety, State of California
California State Capitol
Sacramento, CA 95814

CC: The Honorable Gavin Newsom
Governor, State of California
California State Capitol
Sacramento, CA 95814

March 18, 2026

RE: Woodhull Opposes **AB 2582** “An act to amend Section 647 of the Penal Code, relating to crimes”

Dear Chair Schultz, Vice-Chair Alanis, and Members of the California State Assembly Public Safety Committee,

My name is Ricci Levy, and I am the President and CEO of the Woodhull Freedom Foundation, a national organization whose mission is to affirm sexual freedom as a fundamental human right. Woodhull protects individuals’ rights across the United States to enjoy sexual dignity, privacy, and consensual sexual expression without societal or governmental interference, coercion or stigmatization. As a representative of Woodhull and in my capacity as an expert on the human right to sexual freedom, I submit this letter to express our strong opposition to [AB 2582](#).

AB 2582 mandates that people convicted of prostitution under 647(b) are required to enter “diversion services” – and that the State fund such services. Such an effort is reflective of misguided policies that harm sex workers and survivors of trafficking.

Our opposition to AB 2582 is informed by decades of work defending the human rights of adults to engage in the consensual exchange of sexual services and to improve working conditions in the sex industry. We have also meticulously researched issues related to sex work in our [Fact Checked by Woodhull](#) series including the [pervasive myths about sex work](#) which have justified harmful policies like AB 2582.

In our opposition to AB 2582 we also uplift the work of the Sex Workers and Erotic Service Provider Legal, Educational and Research Project (ESLERP). This sex worker-led organization has been a leading force in opposing AB 2582 based on their deep knowledge on the harms of diversion programs which they have outlined

in this [policy brief](#). As explained by ESLERP, “**Diversion programs do not reduce prostitution.**” This bill effectively creates a state “slush fund” for already highly problematic programs.

Here we highlight some of the harms of diversion programs which can be avoided by opposing AB 2582:

- Diversion programs are frequently run by faith-based organisations with close ties to law enforcement. This creates an obvious conflict of interest where police are incentivized to arrest people for consensual adult sex work – which then generates revenue for these organisations.
- Diversion programs are already in receipt of significant public funds without any requirement for transparency and accountability as to how those funds are used, or any independent ethics oversight.
- Diversion programs do not have any independent ethics oversight.
- Diversion programs frequently violate the extorted participants' consent to HIV testing.
- Diversion programs require participants' unpaid labor to attend.
- Diversion programs are arbitrary in length and allow the controlling parties to decide if they sign off on the participants' participation – effectively holding them hostage.
- Diversion programs for prostitution do not address the harms caused by criminalization – in that prostitution arrest is a basis for discrimination in housing, employment, parental rights, education, and access to financial institutions.
- Diversion programs undermine trust between law enforcement and the public. AB 233 provides immunity for anyone reporting serious crimes without the threat of being arrested for prostitution – but does not exclude the reporter being forced into a diversion program.
- Diversion programs are not harm reduction but are in fact a form of ‘conversion therapy’ and highly inappropriate.

We urge you to protect the health and human rights of sex workers and survivors of trafficking by opposing AB 2582.

Your consideration of these urgent matters is very much appreciated.

Sincerely,



Ricci Joy Levy
President & CEO
Woodhull Freedom Foundation