



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2330		DATE: 2/5/2026	
COMMITTEE: Government Efficiency			
TESTIFYING: <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
REGISTERED LOBBYIST:			
WITNESS NAME: MICHAEL R. GIBBONS		PHONE NUMBER: 314-650-5783	
REPRESENTING: ST. CHARLES COUNTY		TITLE:	
ADDRESS: 115 EAST HIGH STREET			
CITY: JEFFERSON CITY		STATE: MO	ZIP: 65101
EMAIL:	ATTENDANCE:	SUBMIT DATE: 2/5/2026 12:00 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



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WITNESS NAME			
REGISTERED LOBBYIST:			
WITNESS NAME: RICHARD SHEETS		PHONE NUMBER: 573-635-9134	
REPRESENTING: MISSOURI MUNICIPAL LEAGUE		TITLE:	
ADDRESS: 1727 SOUTHRIDGE DR.			
CITY: JEFFERSON CITY		STATE: MO	ZIP: 65109
EMAIL:	ATTENDANCE:	SUBMIT DATE: 2/5/2026 12:00 AM	
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WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: SARAH BERRY		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/4/2026 9:45 AM	

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HB 2330 materially weakens long-standing annexation protections by lowering thresholds, expanding carve-outs, shortening procedural resistance, and insulating annexations from meaningful judicial review.

Taken as a whole, the bill shifts annexation power decisively away from residents and property owners and toward municipal governing bodies—without adequate voter consent, fiscal transparency, or service-delivery accountability.

This legislation does not merely “clarify” annexation law.

It re-engineers it.

First, HB 2330 expands the definition of “contiguous and compact” in ways that functionally erase the concept. By allowing annexation across highways, rail rights-of-way, and minimal perimeter contact—and by explicitly tolerating the creation of unincorporated “islands”—the bill authorizes boundary manipulation that Missouri courts have historically scrutinized and rejected. These provisions invite gerrymandered annexations driven by tax base capture rather than community cohesion.

Second, the bill dilutes voter consent. Annexation may proceed by ordinance unless a narrowly defined objection threshold is met—placing the burden on residents to affirmatively stop annexation rather than requiring municipalities to affirmatively earn consent. This inversion undermines the democratic premise that residents, not municipalities, control their political affiliation.

Third, HB 2330 compresses and limits judicial remedies. The five-year absolute bar on challenges—including actions seeking to invalidate annexations for procedural defects—operates as a statute of repose that protects unlawful annexations once enough time has passed, regardless of harm. This forecloses due process for affected residents and property owners and insulates governmental overreach from correction.

Fourth, the bill fails to require meaningful fiscal accountability. Annexation carries long-term tax, service, and infrastructure consequences. Yet HB 2330 allows annexation to proceed without binding, enforceable fiscal impact disclosures or guaranteed service delivery—creating precisely the kind of unfunded mandates and service failures Missouri voters have repeatedly rejected.

Finally, HB 2330 fits a broader cross-bill pattern this session: repeated efforts to lower procedural safeguards, narrow citizen standing, shorten challenge windows, and consolidate discretionary power in governing bodies at the expense of voters.

This pattern is not accidental. It is structural—and dangerous.

For these reasons, HB 2330 should be rejected in full. If annexation law is to be amended at all, it must move toward greater voter consent, stronger service guarantees, and expanded—not contracted—judicial review.

CONSTITUTIONAL & LEGAL FOOTNOTES

Mo. Const. art. I, § 2 — All political power is vested in and derived from the people; annexation without meaningful voter consent violates this foundational principle.

Mo. Const. art. I, § 10 — Guarantees due process of law; statutes that foreclose judicial review or impose unreasonable repose periods on challenges to governmental action infringe procedural due process.

Mo. Const. art. III, § 38(a) — Limits the power of the General Assembly to authorize local government actions that impose taxes or financial obligations without voter approval; annexation directly affects taxation and public burdens.

Mo. Const. art. X, § 16 (Hancock Amendment) — Prohibits unfunded mandates and protects taxpayers from hidden fiscal consequences; annexation without enforceable service and cost disclosures risks constitutional violation.

City of Olivette v. Graeler, 369 S.W.2d 85 (Mo. banc 1963) — Missouri courts require annexations to be reasonable, necessary, and grounded in genuine municipal development—not revenue expansion.

State ex rel. City of St. Peters v. Roeder, 466 S.W.2d 55 (Mo. banc 1971) — Confirms that annexation statutes must be strictly construed in favor of affected property owners and residents.

State ex rel. City of Berkeley v. Holmes, 326 S.W.2d 78 (Mo. banc 1959) — Warns against annexation sc



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WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: ARNIE "HONEST-ABE" DIENOFF-STATE PUBLIC ADVOCATE		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: In-Person		SUBMIT DATE: 2/5/2026 11:45 PM
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This Bill needs some work, some discussion and Amendments to protect all parties.