



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2517		DATE: 2/3/2026
COMMITTEE: Economic Development		
TESTIFYING: <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: ARNIE C. DIENOFF-STATE PUBLIC ADVOCATE		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: In-Person	SUBMIT DATE: 2/3/2026 1:21 AM

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.

I am in Support of this Bill. This Bill and Legislation provides Missourians Great Required Disclosures and Consumers Protections with the Sale of Real Estate from Wholesalers throughout Our State.



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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: CHRIS BASS		PHONE NUMBER: 662-871-8129
BUSINESS/ORGANIZATION NAME: NATIONAL ASSN FOR HOUSING REVITALIZATION		TITLE:
ADDRESS: 5000 RIVERSIDE DRIVE BUILDING 5 #100		
CITY: IRVING		STATE: TX
		ZIP: 75063
EMAIL:	ATTENDANCE:	SUBMIT DATE: 2/3/2026 12:00 AM
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WITNESS NAME			
REGISTERED LOBBYIST:			
WITNESS NAME: JASON		PHONE NUMBER: 573-291-6180	
REPRESENTING: MISSOURI ASSOCIATION OF REALTORS		TITLE:	
ADDRESS: 1320 ELMERINE AVENUE			
CITY: JEFFERSON CITY		STATE: MO	ZIP: 65101
EMAIL: jzamkus@gmail.com	ATTENDANCE: In-Person	SUBMIT DATE: 2/3/2026 8:04 AM	
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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: JIMMY VREELAND		PHONE NUMBER: 314-799-2247	
BUSINESS/ORGANIZATION NAME: I BUY STL		TITLE: OWNER	
ADDRESS: 15 SPRINGFIELD			
CITY: ST. LOUIS		STATE: MO	ZIP: 63122
EMAIL:	ATTENDANCE:	SUBMIT DATE: 2/3/2026 12:00 AM	
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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: MARCK DE LA TOUR		PHONE NUMBER: 816-739-0533	
BUSINESS/ORGANIZATION NAME: BEST OFFER KC		TITLE: OWNER	
ADDRESS: 1501 NW MACK AVE			
CITY: BLUE SPRINGS		STATE: MO	ZIP: 64015
EMAIL:	ATTENDANCE:	SUBMIT DATE: 2/3/2026 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: 2/1/2026 8:01 PM	
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HB 2517 is not a consumer-protection bill; it is a selective regulatory intervention that singles out one category of lawful market participants for heightened disclosure and liability while exempting similarly situated actors without a principled justification.

That asymmetry raises serious equal-protection and due-process concerns under both the Missouri and United States Constitutions.

The bill presumes fraud not by conduct, but by role.

It converts an otherwise lawful contractual practice—assignment or novation prior to closing—into a per se suspect activity subject to mandatory scripted disclosures, automatic private rights of action, and Merchandising Practices Act penalties, even where no deception is alleged or proven.

That is regulation by stigma, not evidence.

HB 2517 further interferes with freedom of contract by rendering entire agreements void or voidable based on technical disclosure defects unrelated to material harm, while prohibiting waiver even by informed, consenting parties.

Courts have repeatedly warned against statutory schemes that impose punitive consequences divorced from actual injury, particularly where sophisticated parties are capable of assessing risk.

The bill’s carve-outs for family members and affiliated entities underscore the arbitrariness of its scope.

If the concern is informational asymmetry or unfair dealing, those risks do not disappear merely because the assignee is related by blood or corporate structure.

Selective exemptions undermine the bill’s stated rationale and expose it as an attempt to regulate outcomes rather than prevent misconduct.

Missouri already possesses robust tools to address fraud, deception, and unconscionable practices in real estate transactions.

HB 2517 does not fill a regulatory gap; it creates one by substituting categorical suspicion for case-by-

case enforcement grounded in evidence.

For these reasons, the bill should be rejected.

Footnotes:

BMW of North America, Inc. v. Gore, 517 U.S. 559, 574–75 (1996).

(Due process limits punitive regulatory schemes untethered to actual misconduct or harm.)

State ex rel. Diehl v. O'Malley, 95 S.W.3d 82, 88 (Mo. banc 2003).

(Legislation must operate uniformly upon similarly situated parties absent a rational basis for differential treatment.)

Allied Structural Steel Co. v. Spannaus, 438 U.S. 234, 244–45 (1978).

(Substantial impairment of private contracts requires a legitimate and proportionate public purpose.)