



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026	
COMMITTEE: Emerging Issues			
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 "HONEST-ABE" DIENOFF-STATE PUBLIC ADVOCATE		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: In-Person	SUBMIT DATE: 2/9/2026 11:50 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

**I am in Support of this Bill and allowing Religious Gatherings and Services in time of Emergencies.
This is a guarantee in Our Federal and State Constitutions.**



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026	
COMMITTEE: Emerging Issues			
TESTIFYING: <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: BYRON KEELIN		PHONE NUMBER: 314-402-0655	
BUSINESS/ORGANIZATION NAME: FREEDOM PRINCIPLE		TITLE: PRESIDENT	
ADDRESS: PO BOX 2			
CITY: BALLWIN		STATE: MO	ZIP: 63011
EMAIL: freedomprinciplemo@protonmail.com	ATTENDANCE: Written	SUBMIT DATE: 2/9/2026 6:02 AM	

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

We support House Bill 2760, the "Protecting Religious Assembly in States of Emergency (PRAISE) Act," which aims to safeguard individuals' rights to gather for religious services on private property during times of emergency. This legislation is a crucial affirmation of the core values enshrined in our Constitution, specifically the rights to private property and the free exercise of religion.

The importance of prohibiting emergency orders that restrict or ban assemblies on private property cannot be overstated. History has demonstrated that, in times of crisis, government actions—though often well-intentioned—can inadvertently overreach, encroaching on the fundamental liberties of law-abiding citizens. Private property is a cornerstone of individual freedom, and the ability to invite others to one's home or house of worship is essential to the fabric of our communities and our state's traditions.

By ensuring that emergency orders cannot be used to prohibit religious services on private property, this bill draws a clear boundary that protects both property rights and religious freedom. It prevents the state or its subdivisions from singling out houses of worship or private gatherings for restriction, ensuring that people of faith are able to assemble, even in challenging times—except in the most immediate and universally dangerous situations, such as widespread natural disasters. This balanced approach respects both public safety and civil liberties.

Furthermore, this bill recognizes that emergency powers should not be a blanket justification to interfere with constitutionally protected activities. It rightly allows for reasonable limitations in cases of immediate danger—floods, fires, and similar threats—while mandating that religious services must be allowed to resume once such imminent threats have passed.

In conclusion, House Bill 2760 is a necessary and prudent measure to ensure that the state respects private property and religious assembly, even amidst emergencies. It provides essential legal recourse to faith communities whose rights are infringed, and strengthens the principle that freedom is not simply a privilege to be enjoyed in ordinary times, but a right to be preserved—especially in times of crisis. I urge the committee to support and advance this important legislation.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026	
COMMITTEE: Emerging Issues			
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: TIMOTHY FABER		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/9/2026 12:02 PM	

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

“Elisha Williams wrote in 1744 that “a right that is dependent upon the will of another is not a right at all.” If the right for people to assemble is dependent upon a government official or agency then it is no right at all. Yet our constitution guarantees of God-given right to freedom of worship. So I strongly support this bill to codify and clarify the right of the people to freely worship where their consciences dictate without interruption or restraint from the government. Also, as was mentioned earlier in this discussion, while churches were allowed to meet in parking lots or via Zoom during a pandemic, that is no different than what Williams wrote in another part of that same treatise....civil authority has no right to determine if a person should pray standing or pray while sitting; nor to partake of other functions of worship in a certain manner. By the same token, restricting worshippers to praying while in their car in the parking lot or while participating in a Zoom call, rather than gathered together in their regular place of worship, is an egregious violation of our right to freedom of worship. I call upon you to uphold the constitution and vote yes on this bill.”



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026
COMMITTEE: Emerging Issues		
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: BRIAN KAYLOR		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME: WORD&WAY		TITLE: PRESIDENT
ADDRESS:		
CITY: JEFFERSON CITY		STATE: MO
		ZIP: 65109
EMAIL: bkaylor@wordandway.org	ATTENDANCE: In-Person	SUBMIT DATE: 2/9/2026 3:06 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

This bill puts public health at risk and wrongly ties the arms of public officials. When it comes to pandemic public health rules, houses of worship should be treated like other mass gatherings. They should not be targeted to be shut down, but they also should not receive a special exemption. There should not be a pandemic privilege for religion.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026
COMMITTEE: Emerging Issues		
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: CYNTHIA HOLMES		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/9/2026 2:58 PM

THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.
Houses of worship should not seek or be given special exemptions from laws to protect public health.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026	
COMMITTEE: Emerging Issues			
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: KORTNIE HUDDLESTON		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written		SUBMIT DATE: 2/9/2026 10:05 PM

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

I stand in firm opposition to HB 2760 (Pouche). While the right to religious exercise is among our most fundamental freedoms, it does not entitle religious institutions to special exemptions from laws designed to protect public safety. These bills would dangerously prioritize religious preferences over the well-being of Missourians, violating constitutional principles and undermining our state’s ability to respond to emergencies.

The legislation’s broad language exempts places of worship from neutral, generally applicable restrictions during public emergencies—a clear violation of the Establishment Clause. As the Supreme Court affirmed in *Lee v. Weisman*, the principle that government may accommodate the free exercise of religion does not supersede the fundamental limitations imposed by the Establishment Clause and the right to religious exercise doesn’t include the right to burden or harm others. Yet this bill would do exactly that, granting faith groups unchecked privileges while schools, businesses, and secular gatherings remain bound by life-saving rules. Imagine the consequences: A shelter-in-place order during an active shooter scenario ignored by a congregation. A wildfire evacuation order defied by a religious group—all shielded under this bill’s vague language.

These risks are not hypothetical. During COVID-19, states that exempted religious services from public health rules saw deadly superspreader events. Missouri cannot afford to repeat these mistakes. The bill’s narrow exemption for “acts of violence” ignores nonviolent threats like disease outbreaks, natural disasters, or mass gatherings that strain first responders. Neutral, nondiscriminatory laws exist to protect everyone—faith-based carve-outs jeopardize that balance.

Additionally, this legislation is unnecessary. Missouri law already requires the government to demonstrate extraordinary justification for restricting religious exercise. Our state’s existing safeguards ensure worship is disrupted only in the rarest circumstances. HB 2760 solves no real problem—they instead invite chaos, litigation, and harm.

Do not sacrifice Missourians’ safety for political symbolism. Reject these bills. Uphold the Constitution’s promise of equality and ensure no institution—religious or secular—is above the law.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026	
COMMITTEE: Emerging Issues			
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: MICHAEL DREYER		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/9/2026 10:04 PM	

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

I stand in firm opposition to HB 2760 (Pouche). While the right to religious exercise is among our most fundamental freedoms, it does not entitle religious institutions to special exemptions from laws designed to protect public safety. These bills would dangerously prioritize religious preferences over the well-being of Missourians, violating constitutional principles and undermining our state’s ability to respond to emergencies.

The legislation’s broad language exempts places of worship from neutral, generally applicable restrictions during public emergencies—a clear violation of the Establishment Clause. As the Supreme Court affirmed in *Lee v. Weisman*, the principle that government may accommodate the free exercise of religion does not supersede the fundamental limitations imposed by the Establishment Clause and the right to religious exercise doesn’t include the right to burden or harm others. Yet this bill would do exactly that, granting faith groups unchecked privileges while schools, businesses, and secular gatherings remain bound by life-saving rules. Imagine the consequences: A shelter-in-place order during an active shooter scenario ignored by a congregation. A wildfire evacuation order defied by a religious group—all shielded under this bill’s vague language.

These risks are not hypothetical. During COVID-19, states that exempted religious services from public health rules saw deadly superspreader events. Missouri cannot afford to repeat these mistakes. The bill’s narrow exemption for “acts of violence” ignores nonviolent threats like disease outbreaks, natural disasters, or mass gatherings that strain first responders. Neutral, nondiscriminatory laws exist to protect everyone—faith-based carve-outs jeopardize that balance.

Additionally, this legislation is unnecessary. Missouri law already requires the government to demonstrate extraordinary justification for restricting religious exercise. Our state’s existing safeguards ensure worship is disrupted only in the rarest circumstances. HB 2760 solves no real problem—they instead invite chaos, litigation, and harm.

Do not sacrifice Missourians’ safety for political symbolism. Reject these bills. Uphold the Constitution’s promise of equality and ensure no institution—religious or secular—is above the law.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026
COMMITTEE: Emerging Issues		
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: PATRICIA DANIEL		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/8/2026 7:37 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

I oppose HB 2760 because religious places of worship should not be exempt from public orders that protect the people of the state. Places of worship have to comply with building and fire codes so they should not be exempt if officials feel it is not safe to hold public services. There are other ways these organizations can meet without jeopardizing the health of their members and they should NOT be allowed to bring a civil action for relief if there is a state of emergency.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026
COMMITTEE: Emerging Issues		
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
REGISTERED LOBBYIST:		
WITNESS NAME: SAGE CORAM		PHONE NUMBER:
REPRESENTING: AMERICAN CIVIL LIBERTIES UNION OF MISSOURI		TITLE:
ADDRESS:		
CITY: ST. LOUIS	STATE: MO	ZIP: 63101
EMAIL: scoram@aclu-mo.org	ATTENDANCE: Written	SUBMIT DATE: 2/9/2026 11:55 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

The American Civil Liberties Union of Missouri strives to safeguard the First Amendment's guarantee of religious liberty. Missourians have both the right to religious belief and expression and the guarantee that the government will not favor particular faiths over others or prefer religion over non-religion. While HB 2760 includes carve outs for weather emergencies, civil unrest, and other situations, the language prohibiting orders or restrictions to make religious services "impractical" is too broad. This proposed bill could impede the government's ability to respond effectively to future pandemics or other public-health threats that endanger the lives of Missourians. As such, the ACLU of Missouri opposes HB 2760 and urges you to vote no on this bill.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026	
COMMITTEE: Emerging Issues			
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: SARAH BERRY		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/5/2026 3:11 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

This Bill Confuses Religious Liberty With Emergency Immunity

HB 2760 does not merely protect religious exercise — which is already constitutionally protected — it creates a special exemption class during declared emergencies, elevating houses of worship above neutral, generally applicable emergency powers.

The First Amendment does not require religious entities to be exempt from neutral emergency regulations designed to protect life and public safety.

This bill rewrites that standard, replacing constitutional balance with statutory absolutism.

That is not protection — it is overcorrection.

“Intent or Effect” Language Is a Litigation Trap

The bill prohibits restrictions that have the “intent to make, or the effect of making, religious services impractical.”

This standard is:
Vague
Subjective
Litigation-guaranteed

Any neutral emergency order — curfews, capacity limits, road closures, evacuation timing — could be alleged to have the effect of burdening worship.

This exposes:
Cities
Counties
Health departments
Emergency managers

to retroactive civil liability for decisions made under crisis conditions.

Emergency response cannot function under threat of punitive damages after the fact.²

The Private Property Clause Is Constitutionally Reckless

HB 2760 states that emergency orders “shall not prohibit religious services that are held on private property.”

That language:

Ignores zoning authority

Ignores fire codes

Ignores occupancy and safety limits

Ignores the rights of neighbors and surrounding residents

The Constitution protects religious belief and exercise — not unlimited assembly without safety regulation.

This clause invites conflict between:

Religious liberty

Property rights of others

Public safety obligations

...and the bill provides no reconciliation mechanism.

Punitive Damages Against the State = Chilling Emergency Response

HB 2760 authorizes:

Injunctive relief

Compensatory damages

Punitive damages where “malice or recklessness” is alleged

Punitive damages against government actors for emergency decisions are extraordinary, and Missouri courts have consistently limited such exposure for good reason.

This provision will:

Discourage decisive emergency action

Encourage delay and inaction

Shift crisis management from professionals to lawyers

That puts everyone at greater risk, including religious congregations.

The Bill Solves a Problem the Courts Already Addressed

Federal courts — including the U.S. Supreme Court — have already established that:

Religious institutions cannot be treated worse than comparable secular entities

Neutral, generally applicable emergency rules may still apply

HB 2760 is not a clarification — it is an attempt to override existing constitutional jurisprudence with a blunt statutory hammer.

That invites federal preemption challenges and costly litigation Missouri will lose.

Conclusion:

Religious liberty is a constitutional right, not a statutory carve-out to be weaponized during emergencies.

HB 2760:

Undermines neutral emergency authority

Creates expansive civil liability

Encourages litigation over cooperation

Weakens public safety for everyone

If the General Assembly wishes to protect religious exercise, it should do so within constitutional bounds, not by immunizing one category of assembly from emergency governance.

Legislators who hope to serve in future sessions should remember this:

Bad law passed in emotional reaction becomes dangerous precedent in the next crisis. A vote against HB 2760 is not a vote against faith — it is a vote for constitutional restraint, public safety, and responsible governance.

Footnotes

Employment Division v. Smith, 494 U.S. 872 (1990) (neutral laws of general applicability do not violate Free Exercise).

Harlow v. Fitzgerald, 457 U.S. 800 (1982) (qualified immunity principles protect officials acting in good faith).

Prince v. Massachusetts, 321 U.S. 158 (1944) (religious freedom does not include liberty to expose community to harm).

Missouri sovereign immunity doctrine, § 537.600 RSMo; punitive damages against public entities are heavily restricted.

Roman Catholic Diocese of Brooklyn v. Cuomo, 592 U.S. ____ (2020); Tandon v. Newsom, 593 U.S. ____ (2021).



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026
COMMITTEE: Emerging Issues		
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: SUSAN GIBSON		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/8/2026 8:31 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026
COMMITTEE: Emerging Issues		
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: THE REV. DR. TERESA DANIELEY		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/9/2026 8:33 PM

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

As a priest in the Episcopal Diocese of Missouri, I takes seriously the Biblical teaching to love my neighbors. I oppose legislation like HB 2760 and HB 1778 that would carve out special "pandemic privileges" for religious groups.

The legislature should not take power away from local officials during a health emergency. There should NOT be broad religious exemptions for houses of worship from any local or state pandemic order. Such a law would do the opposite of the Great Commandment - endangering our neighbors, rather than trying to protect them from a serious public health threat.



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026
COMMITTEE: Emerging Issues		
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES		
WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: VICTORIA ANDERSON		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME: AMERICAN ATHEISTS		TITLE: STATE POLICY SPECIALIST
ADDRESS: 225 CRISTIANI STREET		
CITY: CRANFORD		STATE: NJ
		ZIP: 07016
EMAIL: vanderson@atheists.org	ATTENDANCE: Written	SUBMIT DATE: 2/6/2026 4:02 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

February 9, 2026

The Honorable Rep. Brad Christ
Chair, House Emerging Issues Committee
201 W. Capitol Avenue #325
Jefferson City, Missouri 65101

Re: **OPPOSE HB 2670, Undermining Public Health**

Dear Chairperson Christ and Members of the House Emerging Issues Committee:

American Atheists, on behalf of its over 1,800 constituents in Missouri, writes in opposition to HB 2760, a bill that seeks to limit the government's ability to act in the best interests of all Missourians during public health emergencies. Not only is this bill unnecessary, as Missouri has already enacted a Religious Freedom Restoration Act, but it will cause unforeseen consequences that risk the health, safety, and religious freedom of all Missouri residents. We strongly urge you to reject this bill.

American Atheists is a national civil rights organization that works to achieve religious equality for all Americans by protecting what Thomas Jefferson called the "wall of separation" between government and religion created by the First Amendment. We strive to create an environment where atheists are accepted as members of our nation's communities and where bigotry against our community is seen as abhorrent and unacceptable. We promote understanding of atheists through education, outreach, and community-building, and work to end the stigma associated with being an atheist in America. American Atheists objects to efforts to subordinate the health and safety of all to the religious beliefs of a few.

During the COVID-19 crisis, governors and health departments across the country issued public health restrictions to prevent people, particularly older or immunocompromised people, from contracting COVID during in-person gatherings. While no one enjoyed complying with these restrictions, most recognized that they were a necessary measure to both protect their communities and hasten the end of the pandemic. Unfortunately, the Centers for Disease Control and Prevention (CDC) found that, despite good intentions and the safety precautions taken, church services became a vector for the spread of this deadly disease. Throughout the pandemic, many thousands of religious organizations and places of worship did adapt to the public health crisis so that their congregations would remain

protected, such as hosting virtual gatherings rather than in-person gatherings. These actions saved countless lives and allowed churches and other houses of worship to return to normal services sooner.

HB 2760 is clearly intended to allow churches to bypass necessary public health measures in times of crisis, using religious freedom as justification. Thousands of churches were able to comply with COVID-19 mandates with minor, if any, interruptions in their normal schedule; their religious freedom was not hampered by temporary requirements created to protect the health and safety of their members. This bill claims otherwise, despite the overwhelming evidence to the contrary.

When it comes to extraordinary public health circumstances, the state government must be given the flexibility to respond to emergencies appropriately. HB 2760 would remove the ability for the government to swiftly respond to a pandemic or other disease outbreak, and put thousands of Missourians at risk. This is particularly alarming in light of the ongoing measles outbreak plaguing the country. Just last year in Texas, over 750 people became dangerously ill after contracting measles, 57 people were hospitalized, and, tragically, two school-aged children perished. Seventeen states have all confirmed measles outbreaks this year and forty-four states reported measles cases in 2025. Should Missouri experience a mass outbreak, the government must be empowered to appropriately respond.

Missouri already has heightened protections for religious beliefs through the state Religious Freedom Restoration Act. This bill will not add any protections that do not already exist, but will prevent the government from protecting its citizens during crises. We strongly urge you to protect the health and well-being of all Missouri residents by rejecting this bill.

Should you have any questions regarding American Atheists' opposition to HB 2760, please contact me at vanderson@atheists.org.

Sincerely,
Victoria Anderson
State Policy Specialist
American Atheists



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2760		DATE: 2/9/2026	
COMMITTEE: Emerging Issues			
TESTIFYING: <input type="checkbox"/> IN SUPPORT OF <input checked="" type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: W B TICHENOR		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/9/2026 1:19 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

Statement in Opposition to HB 1778 & 2760.

W. B. Tichenor, 3517 Briarmont Ave., Apt 104, Columbia, MO 65201-4214
 wbtichenor@gmail.com

I submit this written testimony in opposition to HB 1778 (Missouri Religious Freedom Protection Act) and HB 2760 (Protecting Religious Assembly in States of Emergency) and opposing the passing of these bills out of committee.

HB 1778 and HB 2760 are part of the response to the Covid-19 Pandemic of 2020 which extended into May 2023. The Pandemic resulted in over 104.5 million confirmed case in the US and over 1.16 million deaths from 2020 to May 2023. The Pandemic was an extraordinary public health even. Therefore, it was necessary for state and local governments to take extraordinary measures in attempts to protect the health of all citizens. Some of those measures required closing of businesses and entities holding public gatherings, which included house of worship.

It would appear both of these bills find their basis in a misdirected and/or misinformed view that houses of worship and the activities of religious groups were being targeted by state and local authorities when it was necessary to restrict public gatherings in order to protect the public at large from the Covid-19 virus. The proposed legislation ignores that the issuance of public health orders limiting or prohibiting public gatherings were directed toward business and other entities without any motivation against houses of worship or individuals of any or all religious sects. The public health orders were in no sense an attempt to persecute or discriminate against individuals or places of worship based on any religious test, criterial, or motivation.

In other words, the public health orders were not grounded upon any attempt or intent to deny anyone's First Amendment rights of free exercise. To the extent that places of worship had to suspend gathering to hold services this was a collateral result. What these two pieces of legislation seek is to carve out a specific religious exemption, a religious privilege which places religious groups and places of worship outside the purview of life-saving health rules to which similar gatherings would be subject. In other words, HB 1778 and HB 2760 favor religious entities and adherents over non-religious entities and adherents. That is an infringement of the Establishment Clause by creating what is a religious privilege, denying the same privilege to non-religious groups and facilities.

During the Covid-19 Pandemic the courts stepped in to address instances where government wrongly targeted religious institutions. At the same time, the courts rejected challenges brought by religious bodies because the courts noted that religious gatherings were being treated like similar gatherings. In other words, the public health orders had no anti-religious bias but were generic in their way of protecting the health of the public at large. Religious gatherings should be treated like similar gatherings. Houses of worship should not be subject to harsher rules than similar organizations, but there should not be a special pandemic privilege for religion.

Both bills recognize there is a rightful role and responsibility of government in the area of public safety with regard to religious buildings. HB 1778 prevents excluding places of worship from complying with applicable building and fire codes. One has to question, if houses of worship are to be exempt from public health orders because of a free-exercise argument, why would that likewise not apply to building and fire codes. Those codes can mandate the closing of a building, just as surely as a public health order. Essentially, the bill admits there is a proper roll for government to establish rules, regulations and orders which are for the public in general, which is what public health orders are.

HB 2760 acknowledges that government issued emergency evacuation orders (seven different types of incidents) should apply to houses of worship to prevent worshipers from gathering. No sound rational can be put forth as to why these seven types of danger warrant denying free exercise, but the danger of a deadly pandemic should be beyond the reach of government to protect its citizens.

Pandemics do not differentiate between religious and non-religious folks or buildings. Pandemics are equal opportunity diseases and killers. In the event of another pandemic, Missouri should not and must not place itself in the middle of a public health disaster and crisis by allowing religious gathers to be super-spreader events during such a crisis.

It is inconceivable that the framers of the Constitution envisaged that the Free-Exercise Clause could, should, or would be used to thwart legitimate public health efforts to protect the populace from a pandemic. Quite frankly, both Jefferson and Madison, the architects of the Establishment and Free-Exercise Clauses, were far more intelligent than to recognize any benefit from the enactment of HB 1778 or HB 2760.

I urge a "NO" vote on passing both of these measures out of Committee. There are far more important measures and issues for the General Assembly to address in this session.

###