



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2928		DATE: 1/29/2026
COMMITTEE: Special Committee on Intergovernmental Affairs		
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: ARNIE C. DIENOFF-STATE PUBLIC ADVOCATE		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: In-Person	SUBMIT DATE: 1/29/2026 10:25 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

I am Opposed to this Bill. I believe in Local State Control.



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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: 1/27/2026 9:23 PM

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HB 2928 does not advance public safety. It weakens state accountability while expanding private discretion in an area where constitutional precision is required.

Missouri is a permitless carry state. Where the General Assembly nonetheless chooses to maintain a concealed-carry permitting framework, that framework must be administered under uniform, publicly accountable standards consistent with both the Missouri Constitution and the United States Constitution. HB 2928 fails that test.

I. Improper Delegation of Core Government Authority

By expanding “qualified firearms safety instructor” status to include private organizations and certifications beyond direct governmental oversight, this bill delegates a core public-safety function to entities not accountable to Missouri voters.

Missouri courts have long held that the legislature may not delegate essential governmental powers without clear standards and safeguards.

See State ex rel. Priest v. Gunn, 326 Mo. 908 (1930); State v. Julow, 129 Mo. 163 (1895).

HB 2928 provides neither.

It substitutes notarized paperwork and private certifications for enforceable, state-controlled standards—effectively converting public regulation into private credentialing.

II. Closed Records and Enforcement Without Transparency

The bill further establishes a closed database, accessible only to sheriffs, administered by the Missouri Sheriff Methamphetamine Relief Taskforce—an entity unrelated by function or expertise to firearms training standards.

**This structure raises serious transparency and due-process concerns under:
 Missouri Constitution, Article I, §10 (due process)
 Article I, §14 (open courts and remedies)
 Article III, §38(a) (accountability in public expenditure and administration)**

Public safety enforcement mechanisms cannot be insulated from public accountability without constitutional consequence. Closed systems erode trust and increase liability exposure for both instructors and issuing authorities.

III. Second Amendment Jurisprudence Does Not Support This Scheme

The U.S. Supreme Court has made clear that while firearms regulation is permissible, it must be objective, historically grounded, and consistently applied.

District of Columbia v. Heller, 554 U.S. 570 (2008)

McDonald v. City of Chicago, 561 U.S. 742 (2010)

New York State Rifle & Pistol Ass'n v. Bruen, 597 U.S. ____ (2022)

HB 2928 fails Bruen's requirement that firearm regulations rely on clear historical analogues and neutral standards. Delegating training authority to private associations with differing standards and incentives introduces subjectivity, not uniformity.

IV. Missouri's Own Constitution Demands More

Under Article I, §23 of the Missouri Constitution, the right to keep and bear arms is subject only to laws that are narrowly tailored to public safety.

HB 2928 is not narrowly tailored—it is structurally sloppy.

If training matters, it must be public, uniform, transparent, and enforceable. If it does not, then expanding private instructor authority serves no legitimate state interest.

HB 2928 lowers the state's regulatory responsibility while increasing risk, inconsistency, and constitutional exposure.

Missouri does not need symbolic regulation or privatized enforcement. It needs clear standards administered by accountable public institutions—or none at all.

This bill does neither.

Missouri's Constitution requires standards, not assumptions.

-Rev. Berry



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WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: ABIGAIL M HERNDON		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 1/28/2026 10:46 AM

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Does the state not have any regulations already or is this bill meant to further modify regulations that are already in place?