



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 3316		DATE: 3/11/2026
COMMITTEE: Commerce		
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: TRISH VINCENT		PHONE NUMBER: 573-751-2992
BUSINESS/ORGANIZATION NAME: DEPARTMENT OF REVENUE		TITLE: DIRECTOR
ADDRESS: TRUMAN BLDG., ROOM 670		
CITY: JEFFERSON CITY		STATE: MO
		ZIP: 65101
EMAIL:	ATTENDANCE:	SUBMIT DATE: 3/11/2026 12:00 AM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		



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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: ZACHARY WYATT		PHONE NUMBER: 573-751-0191
BUSINESS/ORGANIZATION NAME: DEPARTMENT OF REVENUE		TITLE:
ADDRESS: TRUMAN BLDG, ROOM 670		
CITY: JEFFERSON CITY		STATE: MO
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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: ARNIE C. "HONEST-ABE" DIENOFF-STATE PUBLIC ADVOCAT		PHONE NUMBER: 314-440-9000	
BUSINESS/ORGANIZATION NAME: STATE PUBLIC ADVOCACY		TITLE:	
ADDRESS: P.O. BOX #1535			
CITY: O' FALLON		STATE: MO	ZIP: 63366
EMAIL: arniedienoff@mail.com	ATTENDANCE: In-Person	SUBMIT DATE: 3/11/2026 11:49 PM	

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I am Opposed to this Bill. This Bill is raising Fees and Collecting More money on the Licensing of Motor Vehicles.



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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: 3/11/2026 7:32 AM	
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HB 3316 is presented as a technical modernization bill for Missouri’s vehicle titling, registration, licensing, and inspection systems.

However, the bill is 58 pages long and combines numerous substantive policy changes into a single legislative vehicle. Legislation of this length and scope makes meaningful public review difficult and reduces transparency for voters attempting to understand how state law is being altered.

Several provisions warrant particular attention.

1. Expansion of Unlicensed Vehicle Sales

HB 3316 raises the threshold at which a person is considered a motor vehicle dealer from six vehicles per year to twelve vehicles per year.

Dealer licensing requirements exist to protect consumers and ensure compliance with tax, titling, and disclosure laws. Increasing the number of vehicles that may be sold without licensure may unintentionally expand opportunities for unlicensed vehicle dealing (“curbstoning”), a practice historically associated with consumer fraud, title irregularities, and tax avoidance.

If the legislature intends to modify dealer licensing thresholds, that policy change may warrant stand-alone consideration rather than inclusion in a large administrative bill.

2. Substantive Policy Changes Embedded in a Technology Implementation Bill

Although framed as modernization of the state’s vehicle administration system, HB 3316 simultaneously modifies multiple regulatory frameworks, including:

- vehicle dealer licensing rules
- vehicle safety inspection requirements
- emissions inspection procedures
- dealer plate usage provisions
- REAL ID administrative procedures.

Combining several distinct regulatory policy changes within a technology implementation bill may make it difficult for legislators and the public to evaluate the impact of each change individually.

3. Unusually Broad Liability Exposure for Administrative Compliance

Section 302.170 reenacts provisions allowing individuals to bring civil actions against the Department of Revenue for violations of the statute governing driver-license data and document handling.

The section authorizes:

noneconomic damages

punitive damages

injunctive relief

recovery of attorney fees

and explicitly states that sovereign immunity shall not be available as a defense.

While protecting driver privacy is an important goal, the combination of a broad statutory standard with a full waiver of sovereign immunity and authorization of punitive damages may expose the state to significant litigation risk for administrative or technical compliance disputes.

When statutes authorize punitive damages and attorney fees against a state agency, careful drafting and clear standards are typically necessary to avoid unintended fiscal exposure.

Conclusion:

HB 3316 combines numerous policy changes affecting vehicle regulation, inspection law, dealer licensing thresholds, and driver-data privacy into a single 58-page omnibus bill. Legislation of this size and scope may limit meaningful public understanding and legislative scrutiny of individual provisions.

Consideration of these policy changes through more narrowly focused legislation may allow for clearer debate, greater transparency, and improved legislative oversight.

Legislative Notice:

The concerns described above arise directly from the statutory changes proposed in HB 3316. Addressing these issues during the legislative process may reduce the risk of unintended regulatory consequences or litigation exposure following implementation.



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WITNESS NAME			
REGISTERED LOBBYIST:			
WITNESS NAME: DOUG NELSON		PHONE NUMBER: 573-690-7209	
REPRESENTING: COPART		TITLE:	
ADDRESS: 235 E HIGH ST			
CITY: JEFFERSON CITY		STATE: MO	ZIP: 65101
EMAIL:	ATTENDANCE:	SUBMIT DATE: 3/11/2026 12:00 AM	

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