



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HJR 104		DATE: 2/17/2026	
COMMITTEE: Elections			
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: BARBARA E LANNING		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written		SUBMIT DATE: 2/15/2026 7:32 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



MISSOURI HOUSE OF REPRESENTATIVES
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BILL NUMBER: HJR 104		DATE: 2/17/2026
COMMITTEE: Elections		
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: CAROL A. SCHREIBER		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 8:46 AM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

Elections are the voters chance to enforce term limits. I have always opposed term limits, because I used to work in Jefferson City in the 1980s and the vast amount of institutional knowledge of some legislators was critical for good government. Term limits have made it impossible for legislators to understand the process and become an expert in some area of government. Term limits allowed lobbyists to provide the only institutional knowledge. I also strongly support term limits for the Speaker and President Pro Tem. I remember many leaders that stayed in a position too long ended with ethical and criminal issues.



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COMMITTEE: Elections			
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: CAROLE WEBSTER		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written		SUBMIT DATE: 2/15/2026 4:53 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



MISSOURI HOUSE OF REPRESENTATIVES
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BILL NUMBER: HJR 104		DATE: 2/17/2026
COMMITTEE: Elections		
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: CYNTHIA MUELLER		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 2:49 PM
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I support removing the term limits because when good representatives are forced to leave, their 8 years of experience, growth, and knowledge go with them.



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COMMITTEE: Elections			
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: DAVE WEBSTER		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 5:38 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HJR 104		DATE: 2/17/2026	
COMMITTEE: Elections			
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: DAVID PAIGE		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 8:40 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

I support HJR 124



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HJR 104		DATE: 2/17/2026
COMMITTEE: Elections		
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: JOAN GENTRY		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 11:57 AM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

I support the removal of term limits for members of the Missouri House of Representatives. The lack of institutional knowledge makes it much easier for lobbyists to present cookie cutter bills to members who then work to get that piece of legislation passed but are not around later to see the repercussions of the bill.

**Thank you.
Joan Gentry**



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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: JOYCE GORRELL		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/17/2026 12:09 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

I support these bills as lawmakers could spend less time fundraising and more time focusing on the issues that matter to their constituents. Asking the committee to vote "yes" on HJR 104, 122 & 149.



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COMMITTEE: Elections		
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: JUNE PAIGE		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 8:38 AM
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We as constituents should have the right to vote for the best candidate. If someone is doing a great job of representation, they should be allowed to stay in office.



MISSOURI HOUSE OF REPRESENTATIVES
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COMMITTEE: Elections		
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: KATHY J MARINCEL		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 8:21 AM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

Elections serve as a very effective form of term limits and rigid laws prevent constituents from retaining effective representatives

By relaxing limits, lawmakers can build the institutional knowledge necessary to resist outside influence from unelected lobbyists and bureaucrats



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HJR 104		DATE: 2/17/2026	
COMMITTEE: Elections			
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: KAY PARK		PHONE NUMBER: 314-368-1178	
BUSINESS/ORGANIZATION NAME: LEAGUE OF WOMEN VOTERS OF MISSOURI		TITLE: PRESIDENT	
ADDRESS: 9888 OLD WARSON RD			
CITY: ST LOUIS		STATE: MO	ZIP: 63124
EMAIL: kayparklwvmo@gmail.com	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 4:24 PM	

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

On behalf of the League of Women Voters of Missouri I support HJR 104,122 and 149 to remove term limits for the General Assembly. Term limits prevent constituents from retaining effective representatives. By relaxing the limits, lawmakers can build the institutional knowledge to resist outside influence from unelected lobbyists.

Kay Park, President

League of Women Voters of Missouri



MISSOURI HOUSE OF REPRESENTATIVES
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COMMITTEE: Elections			
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: LEA LANGDON		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/17/2026 1:02 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

This resolution would extend term limits. Extending the total time they can serve would provide greater continuity, allowing experienced representatives who understand our concerns to advocate for us over a longer period. It would also reduce the frequency of campaign cycles, meaning lawmakers could spend less time fundraising and more time focusing on the issues that matter to their constituents.



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BILL NUMBER: HJR 104		DATE: 2/17/2026	
COMMITTEE: Elections			
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: MAHREE SKALA		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 10:11 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

This bill would allow legislators to serve longer in one house of the legislature, which would help them build experience and knowledge of the laws. If they aren't being effective, the voters can vote them out of office.



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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: MARSHA LERENBERG		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/15/2026 10:08 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

I urge the Elections committee to vote YES on HJR 104 term limits and all term limit bills under consideration today. I believe elections are effective enough for limiting terms. Additionally, by relaxing term limits, our Missouri legislators can build the institutional knowledge necessary to resist outside influence from unelected lobbyists and bureaucrats. Vote YES!



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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: NANCY ZELIFF		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/15/2026 9:44 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

Elections serve as a very effective form of term limits and rigid laws prevent constituents from retaining effective representatives

By relaxing limits, lawmakers can build the institutional knowledge necessary to resist outside influence from unelected lobbyists and bureaucrats



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COMMITTEE: Elections			
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: PAMELA KAY HOLCUMBRINK		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written		SUBMIT DATE: 2/15/2026 10:53 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



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COMMITTEE: Elections			
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: PAULINE TESTERMAN		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written		SUBMIT DATE: 2/16/2026 12:31 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



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COMMITTEE: Elections			
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: RACHEL WEBB		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/15/2026 6:31 PM	
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Term limits are a well-intentioned action that have not served Missouri well in practice. Elections already serve as term limits, giving residents of a particular district the opportunity to retain their representation or seek new representation. The rigidity of term limits prevents voters in a district from retaining leadership of their choice, especially effective legislators who have developed knowledge and experience. In addition, the rigid term limits create pressure for legislators to "make their marks" in a short period of time, making them susceptible to influence by lobbyists and corporations interests, rather than taking the time to develop legislation that will benefit their constituents and the state of Missouri as a whole. I join the League of Women Voters in supporting this legislation.



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WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: RACHELLE GARDNER-ROE		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written		SUBMIT DATE: 2/17/2026 8:59 AM

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

Elections already serve as a very effective form of term limits and the existing term limits prevent constituents from retaining effective representatives.

By relaxing these limits, lawmakers can build the institutional knowledge necessary to resist outside influence from unelected lobbyists and bureaucrats, which so plague our democratic system.



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COMMITTEE: Elections			
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: RIVA CAPELLARI		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/15/2026 5:28 PM	
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COMMITTEE: Elections			
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: SANDRA MIKULICH		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/17/2026 12:35 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

Elections serve as a very effective form of term limits and rigid laws prevent constituents from retaining effective representatives

By relaxing limits, lawmakers can build the institutional knowledge necessary to resist outside influence from unelected lobbyists and bureaucrats



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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: SHERRY L BUCHANAN		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 6:05 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

I think elections serve as a very effective form of term limits and rigid laws prevent constituents from retaining effective representatives

We need lawmakers who can build the institutional knowledge necessary to resist outside influence from unelected lobbyists and bureaucrats



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COMMITTEE: Elections			
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: STACY MACHADO		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 4:23 AM	
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Elections serve as a very effective form of term limits and rigid laws prevent constituents from retaining effective representatives, lawmakers can build the institutional knowledge necessary to resist outside influence from unelected lobbyists and bureaucrats if this is passed.



MISSOURI HOUSE OF REPRESENTATIVES
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BILL NUMBER: HJR 104		DATE: 2/17/2026
COMMITTEE: Elections		
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: SUSAN GIBSON		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/15/2026 5:22 PM
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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: SUSAN WILLIAMS		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written		SUBMIT DATE: 2/16/2026 10:30 AM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

The current limits prevent constituents from retaining effective representatives. Relaxing limits will allow lawmakers to gain institutional knowledge and resist outside influence from lobbyists and bureaucrats.



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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: THOMAS MARINCEL		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 4:43 PM

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Elections serve as a very effective form of term limits and rigid laws prevent constituents from retaining effective representatives

By relaxing limits, lawmakers can build the institutional knowledge necessary to resist outside influence from unelected lobbyists and bureaucrats



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WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: WINIFRED COLWILL		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/16/2026 9:30 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

This amendment would remove term limits for House members. allowing them to serve as long as voters reelect them. This move would help build institutional memory and knowledge, valuable assets to have in legislative discussions with paid lobbyists.

paid lobbyists.



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WITNESS NAME			
BUSINESS/ORGANIZATION:			
WITNESS NAME: ARNIE C. A.C. "HONEST ABE" DIENOFF		PHONE NUMBER: 314-440-9000	
BUSINESS/ORGANIZATION NAME: MISSOURI STATE PUBLIC ADVOCACY		TITLE: STATE PUBLIC ADVOCATE	
ADDRESS: PO BOX 1535			
CITY: O'FALLON		STATE: MO	ZIP: 63366
EMAIL:	ATTENDANCE:	SUBMIT DATE: 2/17/2026 12:00 AM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			



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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: KATHIE ALLISON		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/15/2026 7:10 PM
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.		

- Elections serve as a very effective form of term limits and rigid laws prevent constituents from retaining effective representatives
- By relaxing limits, lawmakers can build the institutional knowledge necessary to resist outside influence from unelected lobbyists and bureaucrats



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COMMITTEE: Elections			
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: 2/12/2026 1:56 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

A Third Turn About the Ballroom:

A Constitutional Dispatch Regarding HJR 104

It would appear that the General Assembly, having already presented two proposals to revise its own tenure, has now offered a third — HJR 104 — containing language indistinguishable from its companions.

One admires consistency.
 One also observes redundancy.

HJR 104 proposes:

- Eight years in any one chamber prior to December 5, 2030;
- Sixteen years total service across both chambers;
- A post-2030 transition to a unified sixteen-year aggregate cap; and
- Limitations on service as Speaker of the House and President Pro Tempore.

From a federal constitutional standpoint, this proposal remains structurally sound. States retain broad authority to determine qualifications and tenure for state legislators.¹ Courts have repeatedly upheld such measures under rational basis review where they apply prospectively and uniformly.²

The amendment does not impose punishment,³ does not single out identifiable individuals,⁴ and does not intrude upon federal office qualifications.⁵

Thus, constitutionality is not the central risk.

But repetition introduces a different species of vulnerability: procedural and structural ambiguity.

I. Ballot Summary Exposure

The official summary reads:

“Prohibit legislators from serving more than sixteen years total...”

Yet the operative text contains:

- Pre-2030 chamber-specific caps;

- Transitional counting provisions;
- Exceptions for partial terms;
- Counting rules for pre-December 5, 2030 service.

Missouri courts have invalidated or required revision of ballot summaries that materially simplify or omit substantive legal effects.⁶

When three substantially identical amendments advance concurrently, courts may inquire whether voters are being presented with clear, singular notice — or duplicative measures that create confusion.

Ballot litigation risk increases not because the amendment is unconstitutional, but because clarity becomes more difficult to maintain across parallel proposals.

II. Internal Governance Harmonization

Article III historically grants each chamber authority to determine its own rules and elect its officers. Embedding leadership caps within the Constitution itself is permissible.

However, absent explicit harmonization language, litigants may argue that the amendment conflicts with internal rule-making authority.

Such arguments would likely fail — but they would incur cost.

Precision reduces litigation. Ambiguity invites it.

III. Structural Pattern Note

Three identical joint resolutions altering the same constitutional section within a single General Assembly session is not legally defective — but it is procedurally curious.

From a litigation strategist's perspective, duplication:

- Complicates legislative history;
- Increases the probability of consolidated ballot challenges;
- Raises interpretive questions if multiple measures reach the ballot;
- Creates unnecessary judicial workload if one supersedes another.

When constitutional amendments are introduced in parallel without substantive variation, the judiciary often reads the redundancy as procedural layering rather than policy refinement.

Courts are tolerant of authority.

They are less tolerant of confusion.

HJR 104, standing alone, is unlikely to face successful federal constitutional challenge under prevailing precedent. However, the cumulative advancement of materially identical amendments may increase the likelihood of pre-election litigation under Chapter 116, RSMo, particularly with respect to ballot clarity and voter notice. The General Assembly is advised that consolidation and precision would mitigate foreseeable litigation exposure and associated fiscal cost.

Missouri has authority to structure legislative term limits. The constitutional question is largely settled. The procedural question — why multiple identical amendments are advancing simultaneously — is what courts will examine if ballot litigation arises.

Footnotes

Gregory v. Ashcroft, 501 U.S. 452, 460–61 (1991).

Bates v. Jones, 131 F.3d 843, 847–48 (9th Cir. 1997) (en banc).

Calder v. Bull, 3 U.S. (3 Dall.) 386, 390 (1798).

Nixon v. Adm'r of Gen. Servs., 433 U.S. 425, 468 (1977).

U.S. Term Limits, Inc. v. Thornton, 514 U.S. 779 (1995).

Brown v. Carnahan, 370 S.W.3d 637, 653–54 (Mo. banc 2012).



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HJR 104		DATE: 2/17/2026	
COMMITTEE: Elections			
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: TRAVIS HEINS		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/17/2026 4:46 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

This bill seeks to solve a problem that doesn't exist.