



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HJR 121		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 7:33 PM
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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

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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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WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: JOANNE SCHRADER		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/15/2026 11:40 PM
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Reducing the number of representatives would alleviate the overcrowding of the representatives' offices currently in the capitol. It would eliminate the need to build an addition. The State of Missouri would save money.



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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

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lections 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: MARSHA LERENBERG		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
ADDRESS:		
CITY:		STATE: ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/15/2026 10:08 PM
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I urge the Elections committee to vote YES on HJR 121 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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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
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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
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I believe the voters should have the right to re-elect members of the general assembly as often as they wish.



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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

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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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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
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Please support this measure that would end term limits for House members. Elections serve as term limits.



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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	
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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
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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		
BUSINESS/ORGANIZATION:		
WITNESS NAME: NANCY COPENHAVER		PHONE NUMBER: 660-263-5725
BUSINESS/ORGANIZATION NAME: LEAGUE OF WOMEN VOTERS OF MISSOURI		TITLE: LWVMO VICE PRESIDENT
ADDRESS: 1512 RIDGELINE DRIVE		
CITY: MOBERLY		STATE: MO
		ZIP: 65270
EMAIL: copenhaver22@sbcglobal.net	ATTENDANCE: Written	SUBMIT DATE: 2/17/2026 7:41 PM

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I am opposed to HJR 121 for the following reasons. The House of Representatives is supposed to be the representative body the closest to the people, so having a smaller ratio of representative to constituent is preferable. This is also why they are elected every two years. Each representative currently represents approximately 36,000 people; cutting the size would make this number very unwieldy. Decreasing the size of the House would substantially increase the size of many rural districts which already cover all or parts of 7 or more counties. This would make communicating with and meeting with constituents in the districts much more difficult and costly. Campaigns would become much more reliant on major media and less on interaction with local voters. This would also discourage many from choosing to run for this office. Although some would say this would save money, currently the cost of the Legislature is a very tiny percent of the Missouri budget, and the small cost is a small price to pay for adequate representation of the voters.



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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: 2/12/2026 2:09 PM	
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A Most Ambitious Rearrangement

A Dispatch Concerning HJR 121

It has come to this author’s studied attention that the General Assembly now proposes something rather more dramatic than a modest refinement of term limits.

**HJR 121 does not merely trim tenure.
 It reduces the House of Representatives from 163 members to 103.**

**It rewrites the redistricting framework.
 It embeds mathematical formulas into constitutional text.**

It narrows who may challenge a redistricting plan in court.

**It directs venue.
 It limits judicial remedy.**

One might say it rearranges the entire ballroom.

Let us proceed without hysteria — but not without clarity.

I. The Reduction of the House

The State possesses authority to determine the size of its legislative chambers.¹ That principle is settled.

However, reducing membership by nearly one-third while imposing strict population deviation limits necessarily enlarges district size. Larger districts complicate compliance with Section 2 of the Voting Rights Act, which prohibits dilution of minority voting strength.²

The resolution proclaims compliance with federal law — as it must — yet structural contraction makes such compliance more legally delicate.

This does not render the proposal unconstitutional.

It renders it litigious.

II. Constitutionalizing “Wasted Votes”

HJR 121 enshrines an efficiency gap formula in the Constitution itself, requiring that the difference in “wasted votes” between two parties not exceed fifteen percent.

The United States Supreme Court has declared partisan gerrymandering claims nonjusticiable under the federal Constitution.³ Missouri is free to impose its own standard.

But once mathematical simulations are written into constitutional text, courts must referee statistical models.

Political science evolves. Constitutional language does not.

That tension guarantees expert testimony, contested methodology, and prolonged litigation.

III. Restricting Who May Sue

Here lies the sharpest edge.

HJR 121 restricts standing to:

“Only an eligible Missouri voter who sustains an individual injury by virtue of residing in a district that exhibits the alleged violation...”

Missouri may define standing for purely state-law claims.

It may not restrict standing for claims arising under the United States Constitution or federal statutes.⁴

If a plaintiff asserts a Voting Rights Act violation or Fourteenth Amendment claim, federal supremacy governs.⁵

To the extent this language attempts to narrow federal judicial access, it will not survive preemption analysis.

This provision is not decorative.
It is combustible.

IV. Venue and Judicial Containment

Requiring filing in Cole County is permissible for state claims.

It does not bar federal court.
It does not prevent removal.
If interpreted as such, it would fail.

V. Judicial Fallback Commission

Assigning appellate judges to draw districts if the commission fails is not unprecedented. Yet placing members of the judiciary in a quasi-legislative function may invite separation-of-powers scrutiny depending on implementation.

It is defensible.
It is not immune from challenge.

VI. Term Limits and Leadership Caps

These provisions mirror prior proposals and remain constitutionally low risk under established precedent.⁶

They are not the controversy here.

The architecture is.

Structural Pattern Observation

Unlike prior term-limit-only resolutions, HJR 121 consolidates:

- Legislative contraction
- Redistricting metrics
- Judicial access limitation
- Venue control
- Term-limit restructuring

When structural power shifts in multiple dimensions simultaneously, courts examine not only legality — but coherence.

The standing restriction and judicial review provisions present the most significant constitutional vulnerability.

Should HJR 121 be adopted, litigation is highly foreseeable, particularly regarding the standing restriction and its interaction with federal supremacy principles. The General Assembly is advised that limiting judicial access in redistricting disputes may invite preemption challenges and federal court review. Precision and reconsideration of these provisions would materially reduce litigation exposure and associated fiscal costs.

“HJR 121 does not simply adjust term limits — it restructures legislative size, redistricting metrics, and judicial access in a single amendment. The most significant legal exposure lies in attempting to narrow who may challenge a redistricting map. That provision will almost certainly be tested in federal court.”

Fiscal Exposure Summary

If enacted, HJR 121 is likely to generate:

- Voting Rights Act litigation under 52 U.S.C. § 10301;
- 42 U.S.C. § 1983 claims;
- Attorney’s fee exposure under 42 U.S.C. § 1988;
- Expert statistical litigation costs;
- Multi-year redistricting challenges.

Redistricting litigation historically produces significant fee-shifting exposure when plaintiffs prevail.

Authorities

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

52 U.S.C. § 10301.

Rucho v. Common Cause, 588 U.S. ____ (2019).

Haywood v. Drown, 556 U.S. 729 (2009).

U.S. Const. art. VI, cl. 2.

Bates v. Jones, 131 F.3d 843 (9th Cir. 1997).



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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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I believe House members can more effectively represent smaller districts.



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WITNESS NAME		
INDIVIDUAL:		
WITNESS NAME: TRAVIS HEINS		PHONE NUMBER:
BUSINESS/ORGANIZATION NAME:		TITLE:
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This bill fails to identify an actual issue that needs to be corrected. I oppose this bill.