

No. 26A_____

**In the
Supreme Court of the United States**

DENNY HOSKINS, *in his official capacity as Missouri Secretary of State,*
Applicant,
v.

RICHARD VON GLAHN,
Respondent.

**APPENDIX TO EMERGENCY APPLICATION FOR STAY AND
ADMINISTRATIVE STAY PENDING APPEAL**

VOL. III OF V

APPENDIX

Volume I

Opinion of the Missouri Supreme Court (September 3, 2026)	1a
Mandate of the Missouri Supreme Court (September 3, 2026)	15a
Order Denying Stay by the Missouri Supreme Court (September 4, 2026)	16a
Judgment of the Circuit Court of Cole County, Missouri (August 19, 2026)	17a
Petition for Declaratory Judgment and Injunctive Relief Under Section 116.200 (August 4, 2026)	54a
Exhibit 1 to Petition for Declaratory Judgment and Injunctive Relief Under Section 116.200 (August 4, 2026)	63a
Exhibit 2 to Petition for Declaratory Judgment and Injunctive Relief Under Section 116.200 (August 4, 2026)	88a
Exhibit 3 to Petition for Declaratory Judgment and Injunctive Relief Under Section 116.200 (August 4, 2026)	91a
Exhibit 4 to Petition for Declaratory Judgment and Injunctive Relief Under Section 116.200 (August 4, 2026)	103a
Exhibit 5 to Petition for Declaratory Judgment and Injunctive Relief Under Section 116.200 (August 4, 2026)	232a
Order Granting Amended Motion to Intervene of Republican National Committee, National Republican Congressional Committee, and Missouri Republican State Committee (August 13, 2026)	242a

Secretary of State’s Answer to the Petition and Affirmative Defenses (August 18, 2026)	252a
Intervenors Republican National Committee, National Republican Congressional Committee, and Missouri Republican State Committee’s Answer to Petition for Declaratory Judgment and Injunction Relief Under Section 116.200 (August 9, 2026)	260a
Secretary of State’s Pre-Trial Brief (August 18, 2026)	273a
Intervenors’ Trial Brief (August 18, 2026)	331a
Plaintiff’s Trial Brief (August 18, 2026)	362a
Joint Stipulation of Facts and Exhibits (August 18, 2026)	399a

Volume II

Stipulated Exhibit 1 – Referendum Petition 2026-R004	408a
Stipulated Exhibit 2 – October 14, 2025 Letter Approving Referendum Petition 2026-R004 as to Form	474a
Stipulated Exhibit 3 – Signature Pages Submitted to the Local Election Authorities for Referendum Petition 2026-R004	477a ¹
Stipulated Exhibit 4 – August 6, 2026 Report PM-007 for Referendum Petition 2026-007	478a
Stipulated Exhibit 5 – August 4, 2026 Certificate of Insufficiency for Referendum Petition 2026-R004	597a
Stipulated Exhibit 6 – Complaint, <i>Missouri General Assembly v. von Glahn</i> , No. 4:25-cv-01535-ZMB (E.D. Mo. Oct. 15, 2026)	607a
Stipulated Exhibit 7 – Motion for Preliminary Injunction, <i>Missouri General Assembly v. von Glahn</i> , No. 4:25-cv-01535-ZMB (E.D. Mo. Oct. 15, 2025)	632a

¹ Stipulated Exhibit 3 was submitted to the circuit court via a flash drive because of its voluminous contents. A copy of the flash drive can be provided on request.

Stipulated Exhibit 8 – Memorandum and Order, <i>Missouri General Assembly v. von Glahn</i> , No. 4:25-cv-01535-ZMB (E.D. Mo. Dec. 8, 2025)	636a
Stipulated Exhibit 9 – State of Missouri’s Motion to Alter Judgment and Memorandum in Support, <i>Missouri General Assembly v. von Glahn</i> , No. 4:25-cv-01535-ZMB (E.D. Mo. Jan. 5, 2026)	648a
Stipulated Exhibit 10 –Memorandum and Order, <i>Missouri General Assembly v. von Glahn</i> , No. 4:25-cv-01535-ZMB (E.D. Mo. May 11, 2026)	665a
Stipulated Exhibit 11 – Make Your Voice Heard: Missouri’s Initiative Petition Process	673a
Stipulated Exhibit 12 – October 15, 2025 Press Release from the Secretary of State	717a
Stipulated Exhibit 13 – October 16, 2025 Press Release from the Secretary of State	719a
Stipulated Exhibit 14 – Jason Rosenbaum, <i>Missouri Republicans learn that redrawing congressional lines isn’t so easy</i> , St. Louis Public Radio (Oct. 28, 2025)	722a
Stipulated Exhibit 15 – Jason Rosenbaum, <i>Group asks judge to force Missouri secretary of state to decide redistricting referendum</i> , St. Louis Public Radio (May 18, 2026)	731a
Stipulated Exhibit 16 – Kacen Bayless, <i>Is Missouri GOP dragging out redistricting cases? ‘Delay works in our favor’</i> , Kansas City Star (Jan. 8, 2026).....	736a
Stipulated Exhibit 17 – 1922 Election Results for Proposition 17	740a
Stipulated Exhibit 18 – Newspaper Articles Regarding the Attempted 1922 Referendum Election on Congressional Redistricting.....	744a
Stipulated Exhibit 19 – Newspaper Articles Regarding the Attempted 1952 Referendum Election on Congressional Redistricting.....	748a

Volume III

Stipulated Exhibit 20 – House Bill 2909 (2022)	752a
Stipulated Exhibit 21 – Affidavit of Brianna Lennon (Aug. 13, 2026)	904a
Stipulated Exhibit 22 –Motion to Expedite, <i>State ex rel. People Not Politicians v. Limbaugh</i> , No. WD88821 (Mo. Ct. App. April 1, 2026).	908a

Stipulated Exhibit 23 – Suggestions in Support of Petition for a Writ of Prohibition, <i>State ex rel. People Not Politicians v. Limbaugh</i> , No. WD88821 (Mo. Ct. App. April 1, 2026).	912a
Stipulated Exhibit 24 – Motion to Expedite Appellate Proceedings, <i>Luther v. Hoskins</i> , No. SC101412 (Mo. Dec. 31, 2025)	924a
Stipulated Exhibit 25 – Plaintiffs’ Suggestions in Opposition to Continue Trial Setting, <i>Wise v. State</i> , No. 2516-CV29597 (Jackson Cnty. Cir. Ct. Dec. 15, 2025)	929a
Stipulated Exhibit 26 – Plaintiffs’ Suggestions in Support of Motion for Preliminary Injunction and Consolidation with Hearing on Merits, <i>Maggard v. State</i> , No. 25AC-CC09120 (Cole Cnty. Cir. Ct. Jan. 14, 2026)	938a
Stipulated Exhibit 27 – Brief of Respondent Denny Hoskins, <i>Luther v. Hoskins</i> , No. SC101412 (Mo. Feb. 9, 2026)	960a
Stipulated Exhibit 28 – Affidavit of Tammy Brown (Aug. 13, 2026).....	1023a
Stipulated Exhibit 29 – Brief of Amicus Curiae Brianna Lennon, County Clerk & Election Authority of Boone County in Support of Appellants, <i>Maggard v. State</i> , No. SC101581 (Mo. April 10, 2026)	1029a
Stipulated Exhibit 30 – Brief of <i>Amici Curiae</i> St. Charles County Director of Elections Kurt Bahr, in his personal capacity, the American Redistricting Project, and Restoring Integrity and Trust in Elections in Support of Defendants-Respondents, <i>Maggard v. State</i> , No. SC101581 (Mo. April 28, 2026)	1050a

Volume IV

Stipulated Exhibit 31 – Transcript Excerpts, <i>Wise v. State</i> , No. 2516-CV29597 (Jackson Cnty. Cir. Ct. Feb. 19, 2026).....	1082a
Stipulated Exhibit 32 – Mathew Pilger, <i>Missouri’s New Congressional Map Could Complicate Midterm Voting Clerks Warn</i> , MissouriNet (Sept. 15, 2025).....	1228a
Stipulated Exhibit 33 – Jen Rice & Yunion Rivas, <i>Missouri Block’s anti-gerrymander referendum from November ballot in attempt to silence voters</i> , Democracy Docket (Aug. 4, 2026).....	1235a
Stipulated Exhibit 34 – Jen Rice, GOP derails bid to stop Missouri gerrymander for 2026, Democracy Docket (Mar. 27, 2026).....	1242a

Stipulated Exhibit 35 – Affidavit of Republican National Committee (Aug. 13, 2026)	1248a
Stipulated Exhibit 36 – Affidavit of Executive Director of Missouri Republican State Committee (Aug. 11, 2029)	1253a
Stipulated Exhibit 37 – Affidavit of Deputy General Counsel of National Republican Congressional Committee (Aug. 17, 2026)	1259a
Trial Transcript (August 19, 2026)	1264a

Volume V

Appellant’s Brief in the Missouri Supreme Court (August 25, 2026)	1335a
Respondent’s Brief in the Missouri Supreme Court (August 27, 2026)	1442a
Intervenors-Respondents’ Brief in the Missouri Supreme Court (August 27, 2026)	1519a
Appellant’s Reply Brief in the Missouri Supreme Court (August 30, 2026)	1605a
Motion for a Stay of Injunction Pending Emergency Appeal and Application for Stay to the Supreme Court of the United States (September 4, 2026)	1639a
Declaration of Denny Hoskins in Support of Respondent’s Motion for a Stay Pending Appeal (September 3, 2026)	1664a
Declaration of Christopher Brundick in Support of Applicant’s Motion for a Stay Pending Appeal (September 4, 2026)	1669A

Stipulated Exhibit 20

SECOND REGULAR SESSION
[TRULY AGREED TO AND FINALLY PASSED]
HOUSE COMMITTEE SUBSTITUTE FOR
HOUSE BILL NO. 2909
101ST GENERAL ASSEMBLY

5799H.02T

2022

AN ACT

To repeal sections 128.345, 128.346, and 128.348, RSMo, and to enact in lieu thereof twelve new sections relating to the composition of congressional districts, with an emergency clause.

Be it enacted by the General Assembly of the state of Missouri, as follows:

Section A. Sections 128.345, 128.346, and 128.348, RSMo, are repealed and twelve
2 new sections enacted in lieu thereof, to be known as sections 128.345, 128.346, 128.348,
3 128.461, 128.462, 128.463, 128.464, 128.465, 128.466, 128.467, 128.468, and 128.469, to
4 read as follows:

128.345. **1.** All references in sections 128.451 to 128.458 to counties, voting districts
2 (VTD), and tract-blocks (Block) mean those counties, voting districts (VTD), and tract-blocks
3 (Block) as reported to the state by the United States Bureau of the Census for the 2010 census.

4 **2. All references in sections 128.461 to 128.468 to counties, voting districts**
5 **(VTD), and tract-blocks (Block) mean those counties, voting districts (VTD), and tract-**
6 **blocks (Block) as reported to the state by the United States Bureau of the Census for the**
7 **2020 census.**

128.346. **1.** The districts established by the provisions of sections 128.400 to 128.440
2 for the election of representatives to the Congress of the United States shall be effective
3 beginning with election to the 108th Congress and through the election of the 112th Congress.

4 **2.** The districts established by sections 128.451 to 128.458 for the election of
5 representatives to the Congress of the United States shall be effective beginning with the
6 election to the 113th Congress **and through the election of the 117th Congress.**

EXPLANATION — Matter enclosed in bold-faced brackets **[thus]** in the above bill is not enacted and is intended to be omitted from the law. Matter in **bold-face** type in the above bill is proposed language.

HCS HB 2909

2

7 **3. The districts established by sections 128.461 to 128.468 for the election of**
8 **representatives to the Congress of the United States shall be effective beginning with the**
9 **election to the 118th Congress.**

 128.348. ~~[The state of Missouri is hereby divided into nine congressional districts.]~~ 1.
2 Effective with the election for the 113th Congress **and through the election of the 117th**
3 **Congress**, the state of Missouri shall consist of eight congressional districts.

4 **2. Effective with the election of the 118th Congress, the state of Missouri shall**
5 **consist of eight congressional districts.**

6 **3. The legal voters of each district shall elect one member of Congress of the United**
7 **States.**

128.461. The first congressional district shall be composed of the following:

2 **County: St. Louis City MO**

3 **County: St. Louis MO**

4 **VTD: AP001**

5 **VTD: AP002**

6 **VTD: AP003**

7 **VTD: AP004**

8 **VTD: AP005**

9 **VTD: AP006**

10 **VTD: AP007**

11 **VTD: AP008**

12 **VTD: AP009**

13 **VTD: AP010**

14 **VTD: AP011**

15 **VTD: AP012**

16 **VTD: AP013**

17 **VTD: AP014**

18 **VTD: AP015**

19 **VTD: AP016**

20 **VTD: AP017**

21 **VTD: AP018**

22 **VTD: AP019**

23 **VTD: AP020**

24 **VTD: AP021**

25 **VTD: AP022**

26 **VTD: AP023**

27 **VTD: AP024**

HCS HB 2909

3

28 **VTD: AP025**
29 **VTD: AP026**
30 **VTD: AP027**
31 **VTD: AP028**
32 **VTD: AP029**
33 **VTD: AP030**
34 **VTD: AP031**
35 **VTD: AP032**
36 **VTD: AP033**
37 **VTD: AP034**
38 **VTD: AP035**
39 **VTD: AP036**
40 **VTD: AP037**
41 **VTD: AP038**
42 **VTD: AP039**
43 **VTD: AP040**
44 **VTD: AP041**
45 **VTD: AP042**
46 **VTD: AP043**
47 **VTD: AP044**
48 **VTD: AP045**
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50 **VTD: AP047**
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52 **VTD: AP049**
53 **VTD: AP050**
54 **VTD: AP051**
55 **VTD: AP200**
56 **VTD: AP201**
57 **VTD: AP202**
58 **VTD: AP203**
59 **VTD: AP206**
60 **VTD: AP207**
61 **VTD: AP208**
62 **VTD: AP211**
63 **VTD: AP214**
64 **VTD: AP215**

HCS HB 2909

4

65 **VTD: AP216**
66 **VTD: AP217**
67 **VTD: AP218**
68 **VTD: AP225**
69 **VTD: AP230**
70 **VTD: AP232**
71 **VTD: AP233**
72 **VTD: AP237**
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74 **VTD: CC003**
75 **VTD: CC004**
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83 **Block: 291892151022014**
84 **Block: 291892151023025**
85 **VTD: CC005**
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87 **VTD: CC007**
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89 **VTD: CC009**
90 **Block: 291892151021030**
91 **VTD: CC012**
92 **VTD: CC013**
93 **VTD: CC017**
94 **VTD: CC018**
95 **VTD: CC022**
96 **VTD: CC023**
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98 **Block: 291892153011002**
99 **Block: 291892153011003**
100 **Block: 291892153011004**
101 **Block: 291892153011005**

HCS HB 2909

5

102 **Block: 291892153011007**
103 **Block: 291892153011008**
104 **Block: 291892153011009**
105 **VTD: CC024**
106 **VTD: CC027**
107 **Block: 291892153022008**
108 **Block: 291892153022009**
109 **Block: 291892153022011**
110 **Block: 291892153023004**
111 **Block: 291892153023005**
112 **Block: 291892153023006**
113 **Block: 291892153023007**
114 **Block: 291892153023008**
115 **Block: 291892153023009**
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137 **Block: 291892153024010**
138 **VTD: CC030**

HCS HB 2909

6

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175	VTD: CLA008

HCS HB 2909

7

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HCS HB 2909

8

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HCS HB 2909

9

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HCS HB 2909

10

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HCS HB 2909

11

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HCS HB 2909

12

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HCS HB 2909

13

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427 **Block: 291892192002011**
428 **Block: 291892192002012**
429 **Block: 291892192002013**
430 **Block: 291892192002014**
431 **Block: 291892192002015**
432 **Block: 291892192002016**
433 **Block: 291892192002017**
434 **Block: 291892192002018**

HCS HB 2909

14

435 **Block: 291892192002019**
436 **Block: 291892192002020**
437 **Block: 291892192002021**
438 **Block: 291892192002022**
439 **Block: 291892192002023**
440 **Block: 291892195011001**
441 **Block: 291892195011002**
442 **Block: 291892195011003**
443 **VTD: JEF020**
444 **VTD: JEF022**
445 **VTD: JEF024**
446 **VTD: JEF025**
447 **VTD: JEF026**
448 **VTD: JEF027**
449 **VTD: JEF030**
450 **Block: 291892195011000**
451 **VTD: JEF033**
452 **VTD: JEF035**
453 **VTD: JEF036**
454 **VTD: LC001**
455 **VTD: LC002**
456 **VTD: LC003**
457 **VTD: LC004**
458 **VTD: LC005**
459 **VTD: LC006**
460 **VTD: LC007**
461 **VTD: LC008**
462 **VTD: LC009**
463 **VTD: LC010**
464 **VTD: LC011**
465 **VTD: LC012**
466 **VTD: LC013**
467 **VTD: LC014**
468 **VTD: LC015**
469 **VTD: LC016**
470 **VTD: LC017**
471 **VTD: LC018**

HCS HB 2909

15

472 **VTD: LC019**
473 **VTD: LC020**
474 **VTD: LC021**
475 **VTD: LC022**
476 **VTD: LC023**
477 **VTD: LC024**
478 **VTD: LC025**
479 **VTD: LC026**
480 **VTD: LC027**
481 **VTD: LC028**
482 **VTD: LC029**
483 **VTD: LC030**
484 **VTD: LC031**
485 **VTD: LC032**
486 **VTD: LC033**
487 **VTD: LC200**
488 **VTD: LC203**
489 **VTD: LC204**
490 **VTD: LC209**
491 **VTD: MHT008**
492 **VTD: MHT010**
493 **VTD: MHT011**
494 **Block: 291892151031002**
495 **Block: 291892151031032**
496 **Block: 291892151454006**
497 **Block: 291892151454008**
498 **Block: 291892151454009**
499 **Block: 291892151454010**
500 **Block: 291892151454011**
501 **Block: 291892151462005**
502 **VTD: MHT013**
503 **VTD: MHT014**
504 **VTD: MHT015**
505 **Block: 291892151441016**
506 **VTD: MHT017**
507 **VTD: MHT018**
508 **VTD: MHT021**

HCS HB 2909

16

509 **VTD: MHT025**
510 **VTD: MHT028**
511 **VTD: MHT033**
512 **VTD: MHT034**
513 **Block: 291892151413003**
514 **Block: 291892151413009**
515 **Block: 291892151413016**
516 **VTD: MHT040**
517 **Block: 291892151413000**
518 **Block: 291892151413006**
519 **Block: 291892151413007**
520 **Block: 291892151413008**
521 **VTD: MHT043**
522 **VTD: MHT046**
523 **VTD: MHT048**
524 **VTD: MHT052**
525 **Block: 291892151454005**
526 **VTD: MHT058**
527 **Block: 291892151453013**
528 **Block: 291892151454007**
529 **VTD: MHT200**
530 **VTD: MHT206**
531 **VTD: MID001**
532 **VTD: MID002**
533 **VTD: MID003**
534 **VTD: MID004**
535 **VTD: MID005**
536 **VTD: MID006**
537 **VTD: MID007**
538 **VTD: MID008**
539 **VTD: MID009**
540 **VTD: MID010**
541 **VTD: MID011**
542 **VTD: MID012**
543 **VTD: MID013**
544 **VTD: MID014**
545 **VTD: MID015**

HCS HB 2909

17

546	VTD: MID016
547	VTD: MID017
548	VTD: MID018
549	VTD: MID019
550	VTD: MID020
551	VTD: MID021
552	VTD: MID022
553	VTD: MID023
554	VTD: MID024
555	VTD: MID025
556	VTD: MID026
557	VTD: MID027
558	VTD: MID028
559	VTD: MID029
560	VTD: MID030
561	VTD: MID031
562	VTD: MID032
563	VTD: MID033
564	VTD: MID034
565	VTD: MID035
566	VTD: MID036
567	VTD: MID037
568	VTD: MID038
569	VTD: MID039
570	VTD: MID040
571	VTD: MID041
572	VTD: MID042
573	VTD: MID043
574	VTD: MID044
575	VTD: MID045
576	VTD: MID046
577	VTD: MID047
578	VTD: MID048
579	VTD: MID049
580	VTD: MID050
581	VTD: MID051
582	VTD: MID052

HCS HB 2909

18

583	VTD: MID053
584	VTD: MID054
585	VTD: MID055
586	VTD: MID056
587	VTD: MID057
588	VTD: MID058
589	VTD: MID059
590	VTD: MID060
591	VTD: MID061
592	VTD: MID200
593	VTD: MID201
594	VTD: MID202
595	VTD: MID204
596	VTD: NOR001
597	VTD: NOR002
598	VTD: NOR003
599	VTD: NOR004
600	VTD: NOR005
601	VTD: NOR006
602	VTD: NOR007
603	VTD: NOR008
604	VTD: NOR009
605	VTD: NOR010
606	VTD: NOR011
607	VTD: NOR012
608	VTD: NOR013
609	VTD: NOR014
610	VTD: NOR015
611	VTD: NOR016
612	VTD: NOR017
613	VTD: NOR018
614	VTD: NOR019
615	VTD: NOR020
616	VTD: NOR021
617	VTD: NOR022
618	VTD: NOR023
619	VTD: NOR024

HCS HB 2909

19

620	VTD: NOR025
621	VTD: NOR026
622	VTD: NOR027
623	VTD: NOR028
624	VTD: NOR029
625	VTD: NOR030
626	VTD: NOR031
627	VTD: NOR032
628	VTD: NOR033
629	VTD: NOR034
630	VTD: NOR035
631	VTD: NOR036
632	VTD: NOR037
633	VTD: NOR038
634	VTD: NOR039
635	VTD: NOR040
636	VTD: NOR041
637	VTD: NOR042
638	VTD: NOR043
639	VTD: NOR044
640	VTD: NOR045
641	VTD: NOR046
642	VTD: NOR047
643	VTD: NOR048
644	VTD: NOR049
645	VTD: NOR050
646	VTD: NOR051
647	VTD: NOR052
648	VTD: NOR053
649	VTD: NOR054
650	VTD: NOR055
651	VTD: NOR056
652	VTD: NOR200
653	VTD: NOR201
654	VTD: NOR202
655	VTD: NOR203
656	VTD: NOR204

HCS HB 2909

20

657	VTD: NOR208
658	VTD: NOR213
659	VTD: NOR218
660	VTD: NOR222
661	VTD: NRW001
662	VTD: NRW002
663	VTD: NRW003
664	VTD: NRW004
665	VTD: NRW005
666	VTD: NRW006
667	VTD: NRW007
668	VTD: NRW008
669	VTD: NRW009
670	VTD: NRW010
671	VTD: NRW011
672	VTD: NRW012
673	VTD: NRW013
674	VTD: NRW014
675	VTD: NRW015
676	VTD: NRW016
677	VTD: NRW017
678	VTD: NRW018
679	VTD: NRW019
680	VTD: NRW020
681	VTD: NRW021
682	VTD: NRW022
683	VTD: NRW023
684	VTD: NRW024
685	VTD: NRW025
686	VTD: NRW026
687	VTD: NRW027
688	VTD: NRW028
689	VTD: NRW029
690	VTD: NRW030
691	VTD: NRW031
692	VTD: NRW032
693	VTD: NRW033

HCS HB 2909

21

694	VTD: NRW034
695	VTD: NRW035
696	VTD: NRW036
697	VTD: NRW037
698	VTD: NRW038
699	VTD: NRW039
700	VTD: NRW040
701	VTD: NRW041
702	VTD: NRW042
703	VTD: NRW043
704	VTD: NRW044
705	VTD: NRW045
706	VTD: NRW046
707	VTD: NRW047
708	VTD: NRW048
709	VTD: NRW049
710	VTD: NRW050
711	VTD: NRW051
712	VTD: NRW200
713	VTD: NRW201
714	VTD: NRW202
715	VTD: NRW203
716	VTD: NRW204
717	VTD: NRW205
718	VTD: NW001
719	VTD: NW002
720	VTD: NW003
721	VTD: NW004
722	VTD: NW005
723	VTD: NW006
724	VTD: NW007
725	VTD: NW008
726	VTD: NW009
727	VTD: NW010
728	VTD: NW011
729	VTD: NW012
730	VTD: NW013

HCS HB 2909

22

731 **Block: 291892151431003**
732 **Block: 291892151431005**
733 **Block: 291892151431007**
734 **Block: 291892151431019**
735 **Block: 291892151431020**
736 **Block: 291892151431021**
737 **Block: 291892151431029**
738 **Block: 291892151431030**
739 **Block: 291892151431044**
740 **Block: 291892151431045**
741 **Block: 291892151431046**
742 **Block: 291892151431047**
743 **Block: 291892151431048**
744 **Block: 291892151431049**
745 **Block: 291892151431050**
746 **Block: 291892151431051**
747 **Block: 291892151431052**
748 **Block: 291892151431053**
749 **Block: 291892151431054**
750 **Block: 291892151431055**
751 **Block: 291892151431056**
752 **Block: 291892151431057**
753 **Block: 291892151431063**
754 **VTD: NW014**
755 **VTD: NW015**
756 **VTD: NW016**
757 **VTD: NW017**
758 **VTD: NW018**
759 **VTD: NW019**
760 **VTD: NW020**
761 **VTD: NW021**
762 **VTD: NW022**
763 **VTD: NW023**
764 **VTD: NW024**
765 **VTD: NW025**
766 **VTD: NW026**
767 **VTD: NW027**

HCS HB 2909

23

768	VTD: NW028
769	VTD: NW029
770	VTD: NW030
771	VTD: NW031
772	VTD: NW032
773	VTD: NW033
774	VTD: NW034
775	VTD: NW035
776	VTD: NW036
777	VTD: NW037
778	VTD: NW039
779	VTD: NW040
780	VTD: NW041
781	VTD: NW042
782	VTD: NW043
783	VTD: NW044
784	VTD: NW045
785	VTD: NW046
786	VTD: NW047
787	VTD: NW048
788	VTD: NW049
789	VTD: NW050
790	VTD: NW051
791	VTD: NW052
792	VTD: NW200
793	VTD: NW201
794	VTD: NW202
795	VTD: NW203
796	VTD: NW204
797	VTD: NW205
798	VTD: NW206
799	VTD: NW207
800	VTD: NW208
801	VTD: NW209
802	VTD: NW210
803	VTD: NW211
804	VTD: NW212

HCS HB 2909

24

805	VTD: NW213
806	VTD: NW214
807	VTD: NW215
808	VTD: NW216
809	VTD: NW217
810	VTD: NW219
811	VTD: NW220
812	VTD: NW224
813	VTD: NW225
814	VTD: NW226
815	VTD: NW227
816	VTD: NW229
817	VTD: SF001
818	VTD: SF002
819	VTD: SF003
820	VTD: SF004
821	VTD: SF005
822	VTD: SF006
823	VTD: SF007
824	VTD: SF008
825	VTD: SF009
826	VTD: SF010
827	VTD: SF011
828	VTD: SF012
829	VTD: SF013
830	VTD: SF014
831	VTD: SF015
832	VTD: SF016
833	VTD: SF017
834	VTD: SF018
835	VTD: SF019
836	VTD: SF020
837	VTD: SF021
838	VTD: SF022
839	VTD: SF023
840	VTD: SF024
841	VTD: SF025

HCS HB 2909

25

842	VTD: SF026
843	VTD: SF027
844	VTD: SF028
845	VTD: SF029
846	VTD: SF030
847	VTD: SF031
848	VTD: SF032
849	VTD: SF033
850	VTD: SF034
851	VTD: SF035
852	VTD: SF200
853	VTD: SPL001
854	VTD: SPL002
855	VTD: SPL003
856	VTD: SPL004
857	VTD: SPL005
858	VTD: SPL006
859	VTD: SPL007
860	VTD: SPL008
861	VTD: SPL009
862	VTD: SPL010
863	VTD: SPL011
864	VTD: SPL012
865	VTD: SPL013
866	VTD: SPL014
867	VTD: SPL015
868	VTD: SPL016
869	VTD: SPL017
870	VTD: SPL018
871	VTD: SPL019
872	VTD: SPL020
873	VTD: SPL021
874	VTD: SPL022
875	VTD: SPL023
876	VTD: SPL024
877	VTD: SPL025
878	VTD: SPL026

HCS HB 2909

26

879	VTD: SPL027
880	VTD: SPL028
881	VTD: SPL201
882	VTD: SPL202
883	VTD: SPL207
884	VTD: SPL208
885	VTD: UNV001
886	VTD: UNV002
887	VTD: UNV003
888	VTD: UNV004
889	VTD: UNV005
890	VTD: UNV006
891	VTD: UNV007
892	VTD: UNV008
893	VTD: UNV009
894	VTD: UNV010
895	VTD: UNV011
896	VTD: UNV012
897	VTD: UNV013
898	VTD: UNV014
899	VTD: UNV015
900	VTD: UNV016
901	VTD: UNV017
902	VTD: UNV018
903	VTD: UNV019
904	VTD: UNV020
905	VTD: UNV021
906	VTD: UNV022
907	VTD: UNV023
908	VTD: UNV024
909	VTD: UNV025
910	VTD: UNV026
911	VTD: UNV027
912	VTD: UNV028
913	VTD: UNV029
914	VTD: UNV030
915	VTD: UNV031

HCS HB 2909

27

916 **VTD: UNV032**
 917 **VTD: UNV033**
 918 **VTD: UNV034**
 919 **VTD: UNV035**
 920 **VTD: UNV036**
 921 **VTD: UNV037**
 922 **VTD: UNV038**
 923 **VTD: UNV039**
 924 **VTD: UNV040**
 925 **VTD: UNV041**
 926 **VTD: UNV042**
 927 **VTD: UNV043**
 928 **VTD: UNV045**
 929 **VTD: UNV201**
 930 **VTD: UNV202**
 931 **VTD: UNV205**
 932 **VTD: UNV206**
 933 **VTD: UNV208**

128.462. The second congressional district shall be composed of the following:

2 **County: Franklin MO**
 3 **County: St. Charles MO**
 4 **VTD: All Saints**
 5 **Block: 291833117352018**
 6 **Block: 291833117353000**
 7 **Block: 291833117353001**
 8 **Block: 291833117354000**
 9 **Block: 291833117354001**
 10 **Block: 291833117354002**
 11 **Block: 291833117354003**
 12 **Block: 291833117391000**
 13 **Block: 291833117391001**
 14 **Block: 291833117391002**
 15 **Block: 291833117391003**
 16 **Block: 291833117391004**
 17 **Block: 291833117391005**
 18 **Block: 291833117391006**
 19 **Block: 291833117391007**

HCS HB 2909

28

20 **Block: 291833117391009**
21 **Block: 291833117391015**
22 **VTD: Amber Meadows**
23 **VTD: Augusta**
24 **VTD: Bayfield**
25 **VTD: Callaway**
26 **VTD: Canvas Cove**
27 **VTD: Carriage Hills**
28 **VTD: Community**
29 **Block: 291833120032069**
30 **Block: 291833120032070**
31 **Block: 291833120032071**
32 **Block: 291833120032076**
33 **Block: 291833120032091**
34 **Block: 291833121921000**
35 **Block: 291833121921003**
36 **Block: 291833121921004**
37 **Block: 291833121921009**
38 **Block: 291833121921010**
39 **Block: 291833121921011**
40 **Block: 291833121921012**
41 **Block: 291833121921013**
42 **Block: 291833121921014**
43 **Block: 291833121921015**
44 **Block: 291833121921016**
45 **Block: 291833121921019**
46 **Block: 291833121921020**
47 **Block: 291833121921021**
48 **Block: 291833121921022**
49 **Block: 291833121921023**
50 **Block: 291833121921024**
51 **Block: 291833121921025**
52 **Block: 291833121921026**
53 **Block: 291833121921027**
54 **Block: 291833121921028**
55 **Block: 291833121921029**
56 **Block: 291833121921030**

HCS HB 2909

29

57 **Block: 291833121921031**
58 **Block: 291833121921033**
59 **Block: 291833121921050**
60 **Block: 291833121921051**
61 **Block: 291833121922000**
62 **Block: 291833121922001**
63 **Block: 291833121922002**
64 **Block: 291833121922003**
65 **Block: 291833121922004**
66 **Block: 291833121922005**
67 **Block: 291833121922006**
68 **Block: 291833121922007**
69 **Block: 291833121922008**
70 **Block: 291833121922009**
71 **Block: 291833121922010**
72 **Block: 291833121922011**
73 **Block: 291833121922012**
74 **Block: 291833121922014**
75 **Block: 291833121922015**
76 **Block: 291833121922016**
77 **Block: 291833121922017**
78 **Block: 291833121922018**
79 **Block: 291833121922019**
80 **Block: 291833121922020**
81 **Block: 291833121922021**
82 **Block: 291833121922022**
83 **Block: 291833121922023**
84 **Block: 291833121922024**
85 **Block: 291833121922031**
86 **Block: 291833121922032**
87 **Block: 291833121922035**
88 **Block: 291833121922036**
89 **Block: 291833121922037**
90 **Block: 291833121922038**
91 **Block: 291833121922040**
92 **Block: 291833121922043**
93 **Block: 291833121922044**

HCS HB 2909

30

94 **Block: 291833121922045**
95 **Block: 291833121922046**
96 **Block: 291833121922048**
97 **Block: 291833121922049**
98 **Block: 291833121933000**
99 **Block: 291833121933001**
100 **Block: 291833121933002**
101 **Block: 291833121933003**
102 **Block: 291833121933007**
103 **Block: 291833121933008**
104 **Block: 291833121933009**
105 **Block: 291833121933010**
106 **Block: 291833121933011**
107 **Block: 291833121933012**
108 **Block: 291833121933013**
109 **Block: 291833121933014**
110 **Block: 291833121933015**
111 **Block: 291833121933016**
112 **Block: 291833121933017**
113 **Block: 291833121933018**
114 **Block: 291833121933019**
115 **Block: 291833121933020**
116 **Block: 291833121933021**
117 **Block: 291833121933022**
118 **Block: 291833121933023**
119 **Block: 291833121933024**
120 **Block: 291833121933025**
121 **Block: 291833121933026**
122 **Block: 291833121933027**
123 **Block: 291833121933028**
124 **Block: 291833121933029**
125 **Block: 291833121933030**
126 **Block: 291833121933037**
127 **Block: 291833121933038**
128 **Block: 291833121933048**
129 **Block: 291833121933049**
130 **VTD: Delmar**

HCS HB 2909

31

131 **VTD: Discovery**
132 **Block: 291833117352016**
133 **VTD: DuVall**
134 **VTD: Feise**
135 **VTD: Fieldcrest**
136 **VTD: Foristell**
137 **Block: 291833120032054**
138 **Block: 291833120032055**
139 **Block: 291833120032056**
140 **Block: 291833120032058**
141 **Block: 291833120032059**
142 **Block: 291833120032060**
143 **Block: 291833120032061**
144 **Block: 291833120032062**
145 **Block: 291833120032063**
146 **Block: 291833120032064**
147 **Block: 291833120032065**
148 **Block: 291833120032077**
149 **Block: 291833120032079**
150 **Block: 291833120032080**
151 **Block: 291833120032081**
152 **Block: 291833120032084**
153 **Block: 291833120032085**
154 **Block: 291833120032086**
155 **Block: 291833120032087**
156 **Block: 291833120032088**
157 **Block: 291833120032089**
158 **Block: 291833120032090**
159 **VTD: Freymuth**
160 **VTD: Glengate**
161 **Block: 291833117381000**
162 **Block: 291833117381001**
163 **Block: 291833117381002**
164 **Block: 291833117381003**
165 **Block: 291833117381004**
166 **Block: 291833117381005**
167 **Block: 291833117381006**

HCS HB 2909

32

168 **Block: 291833117381007**
169 **Block: 291833117381008**
170 **Block: 291833117381009**
171 **Block: 291833117381010**
172 **Block: 291833117381011**
173 **Block: 291833117381012**
174 **Block: 291833117381023**
175 **Block: 291833117381024**
176 **Block: 291833117381025**
177 **Block: 291833117382000**
178 **Block: 291833117382001**
179 **Block: 291833117382002**
180 **Block: 291833117382003**
181 **Block: 291833117382004**
182 **Block: 291833117382005**
183 **Block: 291833117382006**
184 **Block: 291833117382007**
185 **Block: 291833117382008**
186 **Block: 291833117382009**
187 **Block: 291833117382010**
188 **Block: 291833117382011**
189 **Block: 291833117382012**
190 **Block: 291833117382013**
191 **Block: 291833117382014**
192 **Block: 291833117382015**
193 **Block: 291833117382016**
194 **Block: 291833117382017**
195 **Block: 291833117382018**
196 **Block: 291833117382019**
197 **Block: 291833117382020**
198 **Block: 291833117382021**
199 **Block: 291833117382022**
200 **Block: 291833117382023**
201 **VTD: Hawk Ridge**
202 **VTD: Hillcrest**
203 **Block: 291833117323001**
204 **Block: 291833117323002**

HCS HB 2909

33

205 **Block: 291833117323004**
206 **Block: 291833117324017**
207 **Block: 291833117354004**
208 **Block: 291833117354006**
209 **Block: 291833117382024**
210 **VTD: Hopewell**
211 **VTD: Keystone**
212 **VTD: Monticello**
213 **VTD: New Melle**
214 **VTD: Patriot**
215 **VTD: Phoenix**
216 **VTD: Pioneer**
217 **VTD: Regatta Bay**
218 **Block: 291833119042022**
219 **Block: 291833119092034**
220 **Block: 291833119092035**
221 **VTD: Ridgepoint**
222 **VTD: Starbuck**
223 **VTD: Summerset**
224 **VTD: Turtle Creek**
225 **VTD: Twin Chimneys**
226 **VTD: Twin Oaks**
227 **VTD: Weldon Spring**
228 **VTD: Westfield**
229 **County: St. Louis MO**
230 **VTD: BON001**
231 **VTD: BON002**
232 **VTD: BON003**
233 **VTD: BON004**
234 **VTD: BON005**
235 **VTD: BON006**
236 **VTD: BON007**
237 **VTD: BON008**
238 **VTD: BON009**
239 **VTD: BON010**
240 **VTD: BON011**
241 **VTD: BON012**

HCS HB 2909

34

242	VTD: BON013
243	VTD: BON014
244	VTD: BON015
245	VTD: BON016
246	VTD: BON017
247	VTD: BON018
248	VTD: BON019
249	VTD: BON020
250	VTD: BON021
251	VTD: BON022
252	VTD: BON023
253	VTD: BON024
254	VTD: BON025
255	VTD: BON026
256	VTD: BON027
257	VTD: BON028
258	VTD: BON029
259	VTD: BON030
260	VTD: BON031
261	VTD: BON032
262	VTD: BON033
263	VTD: BON034
264	VTD: BON035
265	VTD: BON036
266	VTD: BON037
267	VTD: BON038
268	VTD: BON039
269	VTD: BON040
270	VTD: BON200
271	VTD: BON202
272	VTD: BON203
273	VTD: BON205
274	VTD: BON206
275	VTD: BON207
276	VTD: BON208
277	VTD: BON210
278	VTD: BON211

HCS HB 2909

35

279 **VTD: CC001**
280 **VTD: CC004**
281 **Block: 291892151021036**
282 **Block: 291892151021041**
283 **VTD: CC009**
284 **Block: 291892151021039**
285 **VTD: CC010**
286 **VTD: CC011**
287 **VTD: CC014**
288 **VTD: CC015**
289 **VTD: CC016**
290 **VTD: CC019**
291 **VTD: CC020**
292 **VTD: CC021**
293 **VTD: CC023**
294 **Block: 291892153011006**
295 **VTD: CC025**
296 **VTD: CC026**
297 **VTD: CC027**
298 **Block: 291892153021013**
299 **Block: 291892153021014**
300 **Block: 291892153021015**
301 **Block: 291892153021016**
302 **Block: 291892153021017**
303 **Block: 291892153021024**
304 **Block: 291892153021025**
305 **Block: 291892153021026**
306 **Block: 291892153021027**
307 **Block: 291892153024001**
308 **VTD: CC028**
309 **VTD: CC029**
310 **VTD: CC032**
311 **VTD: CC034**
312 **VTD: CC036**
313 **VTD: CC039**
314 **VTD: CC040**
315 **VTD: CC049**

HCS HB 2909

36

316 **VTD: CC052**
317 **VTD: CC055**
318 **VTD: CC059**
319 **VTD: CC060**
320 **VTD: CC214**
321 **VTD: CHE001**
322 **VTD: CHE002**
323 **VTD: CHE003**
324 **VTD: CHE004**
325 **VTD: CHE005**
326 **VTD: CHE006**
327 **VTD: CHE007**
328 **VTD: CHE008**
329 **VTD: CHE009**
330 **VTD: CHE010**
331 **VTD: CHE011**
332 **VTD: CHE012**
333 **VTD: CHE013**
334 **VTD: CHE014**
335 **VTD: CHE015**
336 **VTD: CHE016**
337 **VTD: CHE017**
338 **VTD: CHE018**
339 **VTD: CHE019**
340 **VTD: CHE020**
341 **VTD: CHE021**
342 **VTD: CHE022**
343 **VTD: CHE023**
344 **VTD: CHE024**
345 **VTD: CHE025**
346 **VTD: CHE026**
347 **VTD: CHE027**
348 **VTD: CHE028**
349 **VTD: CHE029**
350 **VTD: CHE030**
351 **VTD: CHE031**
352 **VTD: CHE032**

HCS HB 2909

37

353 **VTD: CHE033**
354 **VTD: CHE034**
355 **VTD: CHE035**
356 **VTD: CHE036**
357 **VTD: CHE037**
358 **VTD: CHE038**
359 **VTD: CHE039**
360 **VTD: CHE040**
361 **VTD: CHE041**
362 **VTD: CHE042**
363 **VTD: CHE043**
364 **VTD: CHE044**
365 **VTD: CHE045**
366 **VTD: CHE046**
367 **VTD: CHE047**
368 **VTD: CHE048**
369 **VTD: CHE049**
370 **VTD: CHE050**
371 **VTD: CHE051**
372 **VTD: CHE052**
373 **VTD: CHE053**
374 **VTD: CHE054**
375 **VTD: CHE055**
376 **VTD: CHE057**
377 **VTD: CHE200**
378 **VTD: CHE203**
379 **VTD: CHE212**
380 **VTD: CHE214**
381 **VTD: CHE215**
382 **VTD: CLA006**
383 **VTD: CLA007**
384 **Block: 291892154004009**
385 **Block: 291892154004010**
386 **Block: 291892154004011**
387 **VTD: CLA012**
388 **VTD: CLA013**
389 **Block: 291892154004004**

HCS HB 2909

38

390 **Block: 291892154004012**
391 **Block: 291892154005001**
392 **Block: 291892154005002**
393 **Block: 291892154005003**
394 **VTD: CLA015**
395 **VTD: CLA016**
396 **VTD: CLA022**
397 **Block: 291892189021015**
398 **Block: 291892189021016**
399 **Block: 291892189021017**
400 **VTD: CLA024**
401 **VTD: CLA025**
402 **VTD: CLA026**
403 **VTD: CLA030**
404 **VTD: CLA031**
405 **VTD: CLA032**
406 **VTD: CLA033**
407 **VTD: CLA034**
408 **VTD: CLA035**
409 **Block: 291892174004000**
410 **Block: 291892174004005**
411 **VTD: CLA036**
412 **VTD: CLA037**
413 **VTD: CLA040**
414 **VTD: CLA042**
415 **VTD: CLA045**
416 **VTD: CLA049**
417 **VTD: CLA201**
418 **VTD: CLA202**
419 **VTD: CLA203**
420 **VTD: CLA205**
421 **VTD: CON001**
422 **VTD: CON002**
423 **VTD: CON003**
424 **VTD: CON004**
425 **VTD: CON005**
426 **VTD: CON006**

HCS HB 2909

39

427 **VTD: CON007**
428 **VTD: CON008**
429 **VTD: CON009**
430 **VTD: CON010**
431 **VTD: CON011**
432 **VTD: CON012**
433 **VTD: CON013**
434 **VTD: CON014**
435 **VTD: CON015**
436 **VTD: CON016**
437 **VTD: CON017**
438 **VTD: CON018**
439 **VTD: CON019**
440 **VTD: CON020**
441 **VTD: CON021**
442 **VTD: CON022**
443 **VTD: CON023**
444 **VTD: CON024**
445 **VTD: CON025**
446 **VTD: CON026**
447 **VTD: CON027**
448 **VTD: CON028**
449 **VTD: CON029**
450 **VTD: CON030**
451 **VTD: CON031**
452 **VTD: CON032**
453 **VTD: CON033**
454 **VTD: CON034**
455 **VTD: CON035**
456 **VTD: CON036**
457 **VTD: CON037**
458 **VTD: CON038**
459 **VTD: CON039**
460 **VTD: CON040**
461 **VTD: CON041**
462 **VTD: CON042**
463 **VTD: CON043**

HCS HB 2909

40

464	VTD: CON044
465	VTD: CON045
466	VTD: CON046
467	VTD: CON047
468	VTD: CON048
469	VTD: CON049
470	VTD: CON050
471	VTD: CON051
472	VTD: CON052
473	VTD: CON053
474	VTD: CON200
475	VTD: CON202
476	VTD: CON204
477	VTD: CON205
478	VTD: CON206
479	VTD: CON212
480	VTD: CON213
481	VTD: GRA001
482	VTD: GRA002
483	VTD: GRA003
484	VTD: GRA004
485	VTD: GRA005
486	VTD: GRA006
487	VTD: GRA007
488	VTD: GRA008
489	VTD: GRA009
490	VTD: GRA010
491	VTD: GRA011
492	VTD: GRA012
493	VTD: GRA013
494	VTD: GRA014
495	VTD: GRA015
496	VTD: GRA016
497	VTD: GRA017
498	VTD: GRA018
499	VTD: GRA019
500	VTD: GRA020

HCS HB 2909

41

501	VTD: GRA021
502	VTD: GRA022
503	VTD: GRA023
504	VTD: GRA024
505	VTD: GRA025
506	VTD: GRA026
507	VTD: GRA027
508	VTD: GRA028
509	VTD: GRA029
510	VTD: GRA030
511	VTD: GRA031
512	VTD: GRA032
513	VTD: GRA033
514	VTD: GRA034
515	VTD: GRA035
516	VTD: GRA036
517	VTD: GRA037
518	VTD: GRA038
519	VTD: GRA039
520	VTD: GRA040
521	VTD: GRA041
522	VTD: GRA042
523	VTD: GRA043
524	VTD: GRA044
525	VTD: GRA045
526	VTD: GRA046
527	VTD: GRA047
528	VTD: GRA048
529	VTD: GRA201
530	VTD: GRA202
531	VTD: GRA206
532	VTD: GRA209
533	VTD: GRA210
534	VTD: HAD002
535	VTD: HAD003
536	VTD: HAD006
537	VTD: HAD007

HCS HB 2909

42

538 **VTD: HAD013**
539 **VTD: HAD019**
540 **VTD: HAD020**
541 **VTD: HAD021**
542 **Block: 291892167004000**
543 **Block: 291892167004001**
544 **VTD: HAD022**
545 **VTD: HAD023**
546 **VTD: HAD024**
547 **VTD: HAD025**
548 **VTD: HAD026**
549 **Block: 291892167004002**
550 **VTD: HAD027**
551 **VTD: HAD028**
552 **VTD: HAD029**
553 **VTD: HAD030**
554 **VTD: HAD031**
555 **VTD: HAD032**
556 **VTD: HAD033**
557 **VTD: HAD200**
558 **VTD: JEF001**
559 **VTD: JEF002**
560 **VTD: JEF003**
561 **VTD: JEF004**
562 **VTD: JEF005**
563 **VTD: JEF006**
564 **VTD: JEF008**
565 **VTD: JEF009**
566 **VTD: JEF010**
567 **Block: 291892194003018**
568 **Block: 291892194004000**
569 **Block: 291892194004001**
570 **Block: 291892194004002**
571 **Block: 291892194004003**
572 **Block: 291892194004004**
573 **Block: 291892194004005**
574 **Block: 291892194004006**

HCS HB 2909

43

575 **Block: 291892194004007**
576 **Block: 291892194004008**
577 **Block: 291892194004010**
578 **Block: 291892194004011**
579 **Block: 291892194004012**
580 **Block: 291892194004013**
581 **Block: 291892194004014**
582 **Block: 291892194004015**
583 **Block: 291892194005001**
584 **Block: 291892194005002**
585 **Block: 291892194005005**
586 **Block: 291892194005006**
587 **Block: 291892194005007**
588 **Block: 291892194005015**
589 **Block: 291892194005016**
590 **Block: 291892194005017**
591 **Block: 291892194005018**
592 **Block: 291892194005019**
593 **Block: 291892194005020**
594 **Block: 291892194005021**
595 **Block: 291892194005022**
596 **Block: 291892219001008**
597 **VTD: JEF011**
598 **VTD: JEF014**
599 **Block: 291892170004019**
600 **Block: 291892170004020**
601 **Block: 291892196021002**
602 **Block: 291892196021003**
603 **Block: 291892196021004**
604 **Block: 291892196021005**
605 **Block: 291892196021007**
606 **VTD: JEF015**
607 **VTD: JEF018**
608 **Block: 291892191004013**
609 **Block: 291892191004014**
610 **Block: 291892191004015**
611 **Block: 291892191004016**

HCS HB 2909

44

612 **Block: 291892195021000**
613 **Block: 291892196023005**
614 **Block: 291892196023006**
615 **Block: 291892196023008**
616 **Block: 291892196023009**
617 **VTD: JEF019**
618 **VTD: JEF021**
619 **VTD: JEF023**
620 **VTD: JEF028**
621 **VTD: JEF029**
622 **VTD: JEF030**
623 **Block: 291892195021001**
624 **Block: 291892195021002**
625 **Block: 291892195021003**
626 **Block: 291892195021004**
627 **Block: 291892195021005**
628 **Block: 291892195021006**
629 **Block: 291892195021007**
630 **Block: 291892195021008**
631 **Block: 291892195021009**
632 **Block: 291892195021010**
633 **Block: 291892195021011**
634 **Block: 291892195021012**
635 **Block: 291892195021013**
636 **Block: 291892195021014**
637 **Block: 291892195021015**
638 **Block: 291892195021016**
639 **Block: 291892195022000**
640 **Block: 291892195022002**
641 **Block: 291892195022003**
642 **VTD: JEF031**
643 **VTD: JEF032**
644 **VTD: JEF034**
645 **VTD: JEF037**
646 **VTD: JEF200**
647 **VTD: JEF202**
648 **VTD: LAF001**

HCS HB 2909

45

649	VTD: LAF002
650	VTD: LAF003
651	VTD: LAF004
652	VTD: LAF005
653	VTD: LAF006
654	VTD: LAF007
655	VTD: LAF008
656	VTD: LAF009
657	VTD: LAF010
658	VTD: LAF011
659	VTD: LAF012
660	VTD: LAF013
661	VTD: LAF014
662	VTD: LAF015
663	VTD: LAF016
664	VTD: LAF017
665	VTD: LAF018
666	VTD: LAF019
667	VTD: LAF020
668	VTD: LAF022
669	VTD: LAF023
670	VTD: LAF024
671	VTD: LAF025
672	VTD: LAF026
673	VTD: LAF027
674	VTD: LAF028
675	VTD: LAF029
676	VTD: LAF030
677	VTD: LAF031
678	VTD: LAF032
679	VTD: LAF033
680	VTD: LAF034
681	VTD: LAF035
682	VTD: LAF036
683	VTD: LAF037
684	VTD: LAF038
685	VTD: LAF039

HCS HB 2909

46

686	VTD: LAF040
687	VTD: LAF041
688	VTD: LAF042
689	VTD: LAF043
690	VTD: LAF044
691	VTD: LAF045
692	VTD: LAF046
693	VTD: LAF200
694	VTD: LAF205
695	VTD: LAF207
696	VTD: LEM001
697	VTD: LEM002
698	VTD: LEM003
699	VTD: LEM004
700	VTD: LEM005
701	VTD: LEM006
702	VTD: LEM007
703	VTD: LEM008
704	VTD: LEM009
705	VTD: LEM010
706	VTD: LEM011
707	VTD: LEM012
708	VTD: LEM013
709	VTD: LEM014
710	VTD: LEM015
711	VTD: LEM016
712	VTD: LEM017
713	VTD: LEM018
714	VTD: LEM019
715	VTD: LEM020
716	VTD: LEM021
717	VTD: LEM022
718	VTD: LEM023
719	VTD: LEM024
720	VTD: LEM025
721	VTD: LEM026
722	VTD: LEM027

HCS HB 2909

47

723	VTD: LEM028
724	VTD: LEM029
725	VTD: LEM030
726	VTD: LEM031
727	VTD: LEM032
728	VTD: LEM033
729	VTD: LEM200
730	VTD: LEM201
731	VTD: LEM202
732	VTD: LEM204
733	VTD: LEM205
734	VTD: LEM208
735	VTD: MER001
736	VTD: MER002
737	VTD: MER003
738	VTD: MER004
739	VTD: MER005
740	VTD: MER006
741	VTD: MER007
742	VTD: MER008
743	VTD: MER009
744	VTD: MER010
745	VTD: MER011
746	VTD: MER012
747	VTD: MER013
748	VTD: MER014
749	VTD: MER015
750	VTD: MER016
751	VTD: MER017
752	VTD: MER018
753	VTD: MER019
754	VTD: MER020
755	VTD: MER021
756	VTD: MER022
757	VTD: MER023
758	VTD: MER024
759	VTD: MER025

HCS HB 2909

48

760	VTD: MER026
761	VTD: MER027
762	VTD: MER028
763	VTD: MER029
764	VTD: MER030
765	VTD: MER031
766	VTD: MER032
767	VTD: MER033
768	VTD: MER034
769	VTD: MER035
770	VTD: MER036
771	VTD: MER037
772	VTD: MER038
773	VTD: MER039
774	VTD: MER040
775	VTD: MER041
776	VTD: MER042
777	VTD: MER043
778	VTD: MER044
779	VTD: MER045
780	VTD: MER046
781	VTD: MER047
782	VTD: MER048
783	VTD: MER200
784	VTD: MER202
785	VTD: MER204
786	VTD: MER207
787	VTD: MER209
788	VTD: MER210
789	VTD: MER213
790	VTD: MER214
791	VTD: MER215
792	VTD: MER219
793	VTD: MHT001
794	VTD: MHT002
795	VTD: MHT003
796	VTD: MHT004

HCS HB 2909

49

797 **VTD: MHT005**
798 **VTD: MHT006**
799 **VTD: MHT007**
800 **VTD: MHT009**
801 **VTD: MHT011**
802 **Block: 291892151454012**
803 **VTD: MHT012**
804 **VTD: MHT015**
805 **Block: 291892151441005**
806 **Block: 291892151441008**
807 **Block: 291892151441009**
808 **Block: 291892151441010**
809 **Block: 291892151441015**
810 **Block: 291892151442000**
811 **Block: 291892151442001**
812 **Block: 291892151442002**
813 **Block: 291892151442003**
814 **VTD: MHT016**
815 **VTD: MHT019**
816 **VTD: MHT020**
817 **VTD: MHT022**
818 **VTD: MHT023**
819 **VTD: MHT024**
820 **VTD: MHT026**
821 **VTD: MHT027**
822 **VTD: MHT029**
823 **VTD: MHT030**
824 **VTD: MHT031**
825 **VTD: MHT032**
826 **VTD: MHT034**
827 **Block: 291892151411039**
828 **Block: 291892151411040**
829 **Block: 291892151411041**
830 **Block: 291892151411042**
831 **Block: 291892151411045**
832 **Block: 291892151411046**
833 **Block: 291892151412003**

HCS HB 2909

50

834 **Block: 291892151412004**
835 **Block: 291892151412005**
836 **Block: 291892151412006**
837 **Block: 291892151412007**
838 **Block: 291892151412008**
839 **Block: 291892151413002**
840 **Block: 291892151413010**
841 **Block: 291892151413011**
842 **VTD: MHT035**
843 **VTD: MHT036**
844 **VTD: MHT037**
845 **VTD: MHT038**
846 **VTD: MHT039**
847 **VTD: MHT040**
848 **Block: 291892151412000**
849 **Block: 291892151412002**
850 **VTD: MHT041**
851 **VTD: MHT042**
852 **VTD: MHT044**
853 **VTD: MHT045**
854 **VTD: MHT047**
855 **VTD: MHT049**
856 **VTD: MHT050**
857 **VTD: MHT051**
858 **VTD: MHT052**
859 **Block: 291892151453008**
860 **Block: 291892151453014**
861 **Block: 291892151453015**
862 **VTD: MHT053**
863 **VTD: MHT054**
864 **VTD: MHT055**
865 **VTD: MHT056**
866 **VTD: MHT057**
867 **VTD: MHT058**
868 **Block: 291892151453010**
869 **VTD: MHT059**
870 **VTD: MHT203**

HCS HB 2909

51

871	VTD: MHT207
872	VTD: MHT208
873	VTD: MHT211
874	VTD: MHT212
875	VTD: MHT213
876	VTD: MHT214
877	VTD: MHT216
878	VTD: MHT219
879	VTD: MHT220
880	VTD: MHT222
881	VTD: MHT223
882	VTD: MR001
883	VTD: MR002
884	VTD: MR003
885	VTD: MR004
886	VTD: MR005
887	VTD: MR006
888	VTD: MR007
889	VTD: MR008
890	VTD: MR009
891	VTD: MR010
892	VTD: MR011
893	VTD: MR012
894	VTD: MR013
895	VTD: MR014
896	VTD: MR015
897	VTD: MR016
898	VTD: MR017
899	VTD: MR018
900	VTD: MR019
901	VTD: MR020
902	VTD: MR021
903	VTD: MR022
904	VTD: MR023
905	VTD: MR024
906	VTD: MR025
907	VTD: MR026

HCS HB 2909

52

908	VTD: MR027
909	VTD: MR028
910	VTD: MR029
911	VTD: MR030
912	VTD: MR031
913	VTD: MR032
914	VTD: MR033
915	VTD: MR034
916	VTD: MR035
917	VTD: MR036
918	VTD: MR037
919	VTD: MR038
920	VTD: MR039
921	VTD: MR040
922	VTD: MR041
923	VTD: MR042
924	VTD: MR043
925	VTD: MR044
926	VTD: MR045
927	VTD: MR046
928	VTD: MR047
929	VTD: MR048
930	VTD: MR049
931	VTD: MR050
932	VTD: MR051
933	VTD: MR052
934	VTD: MR053
935	VTD: MR054
936	VTD: MR055
937	VTD: MR056
938	VTD: MR057
939	VTD: MR058
940	VTD: MR059
941	VTD: MR200
942	VTD: MR202
943	VTD: MR203
944	VTD: MR204

HCS HB 2909

53

945 **VTD: MR205**
946 **VTD: MR209**
947 **VTD: MR210**
948 **VTD: MR212**
949 **VTD: MR213**
950 **VTD: NW013**
951 **Block: 291892151431006**
952 **Block: 291892151431008**
953 **Block: 291892151431009**
954 **Block: 291892151431010**
955 **Block: 291892151431011**
956 **Block: 291892151431012**
957 **Block: 291892151431013**
958 **Block: 291892151431014**
959 **Block: 291892151431015**
960 **Block: 291892151431016**
961 **Block: 291892151431024**
962 **Block: 291892151431025**
963 **Block: 291892151431026**
964 **Block: 291892151431027**
965 **Block: 291892151431031**
966 **Block: 291892151431033**
967 **Block: 291892151431064**
968 **VTD: NW038**
969 **VTD: OAK001**
970 **VTD: OAK002**
971 **VTD: OAK003**
972 **VTD: OAK004**
973 **VTD: OAK005**
974 **VTD: OAK006**
975 **VTD: OAK007**
976 **VTD: OAK008**
977 **VTD: OAK009**
978 **VTD: OAK010**
979 **VTD: OAK011**
980 **VTD: OAK012**
981 **VTD: OAK013**

HCS HB 2909

54

982	VTD: OAK014
983	VTD: OAK015
984	VTD: OAK016
985	VTD: OAK017
986	VTD: OAK018
987	VTD: OAK019
988	VTD: OAK020
989	VTD: OAK021
990	VTD: OAK022
991	VTD: OAK023
992	VTD: OAK024
993	VTD: OAK025
994	VTD: OAK026
995	VTD: OAK027
996	VTD: OAK028
997	VTD: OAK029
998	VTD: QUE001
999	VTD: QUE002
1000	VTD: QUE003
1001	VTD: QUE004
1002	VTD: QUE005
1003	VTD: QUE006
1004	VTD: QUE007
1005	VTD: QUE008
1006	VTD: QUE009
1007	VTD: QUE010
1008	VTD: QUE011
1009	VTD: QUE012
1010	VTD: QUE013
1011	VTD: QUE014
1012	VTD: QUE015
1013	VTD: QUE016
1014	VTD: QUE017
1015	VTD: QUE018
1016	VTD: QUE019
1017	VTD: QUE020
1018	VTD: QUE021

HCS HB 2909

55

1019	VTD: QUE022
1020	VTD: QUE023
1021	VTD: QUE024
1022	VTD: QUE025
1023	VTD: QUE026
1024	VTD: QUE027
1025	VTD: QUE028
1026	VTD: QUE029
1027	VTD: QUE030
1028	VTD: QUE031
1029	VTD: QUE032
1030	VTD: QUE033
1031	VTD: QUE034
1032	VTD: QUE035
1033	VTD: QUE036
1034	VTD: QUE037
1035	VTD: QUE038
1036	VTD: QUE039
1037	VTD: QUE040
1038	VTD: QUE041
1039	VTD: QUE042
1040	VTD: QUE043
1041	VTD: QUE044
1042	VTD: QUE045
1043	VTD: QUE046
1044	VTD: QUE047
1045	VTD: QUE048
1046	VTD: QUE049
1047	VTD: QUE200
1048	VTD: QUE201
1049	VTD: QUE202
1050	VTD: QUE203
1051	VTD: QUE204
1052	VTD: QUE205
1053	VTD: QUE207
1054	VTD: QUE208
1055	VTD: QUE209

HCS HB 2909

56

1056	VTD: QUE210
1057	VTD: QUE211
1058	VTD: QUE213
1059	VTD: TSF001
1060	VTD: TSF002
1061	VTD: TSF003
1062	VTD: TSF004
1063	VTD: TSF005
1064	VTD: TSF006
1065	VTD: TSF007
1066	VTD: TSF008
1067	VTD: TSF009
1068	VTD: TSF010
1069	VTD: TSF011
1070	VTD: TSF012
1071	VTD: TSF013
1072	VTD: TSF014
1073	VTD: TSF015
1074	VTD: TSF016
1075	VTD: TSF017
1076	VTD: TSF018
1077	VTD: TSF019
1078	VTD: TSF020
1079	VTD: TSF021
1080	VTD: TSF022
1081	VTD: TSF023
1082	VTD: TSF024
1083	VTD: TSF025
1084	VTD: TSF026
1085	VTD: TSF027
1086	VTD: TSF201
1087	VTD: WH001
1088	VTD: WH002
1089	VTD: WH003
1090	VTD: WH004
1091	VTD: WH005
1092	VTD: WH006

HCS HB 2909

57

1093	VTD: WH007
1094	VTD: WH008
1095	VTD: WH009
1096	VTD: WH010
1097	VTD: WH011
1098	VTD: WH012
1099	VTD: WH013
1100	VTD: WH014
1101	VTD: WH015
1102	VTD: WH016
1103	VTD: WH017
1104	VTD: WH018
1105	VTD: WH019
1106	VTD: WH020
1107	VTD: WH021
1108	VTD: WH022
1109	VTD: WH023
1110	VTD: WH024
1111	VTD: WH025
1112	VTD: WH026
1113	VTD: WH027
1114	VTD: WH028
1115	VTD: WH029
1116	VTD: WH030
1117	VTD: WH031
1118	VTD: WH032
1119	VTD: WH033
1120	VTD: WH034
1121	VTD: WH035
1122	VTD: WH036
1123	VTD: WH037
1124	VTD: WH038
1125	VTD: WH039
1126	VTD: WH040
1127	VTD: WH041
1128	VTD: WH042
1129	VTD: WH043

HCS HB 2909

58

1130 **VTD: WH044**
1131 **VTD: WH045**
1132 **VTD: WH046**
1133 **VTD: WH047**
1134 **VTD: WH200**
1135 **VTD: WH201**
1136 **VTD: WH202**
1137 **VTD: WH203**
1138 **VTD: WH208**
1139 **County: Warren MO**
1140 **VTD: Concord Hill**
1141 **VTD: Dutzow**
1142 **VTD: Elkhorn South**
1143 **VTD: Gore - Case**
1144 **VTD: Holstein**
1145 **VTD: Hopewell**
1146 **VTD: Innsbrook**
1147 **VTD: Lake Sherwood**
1148 **VTD: Macedonia**
1149 **VTD: Marthasville**
1150 **VTD: North Hickory Grove**
1151 **Block: 292198201091007**
1152 **Block: 292198201091030**
1153 **Block: 292198201091038**
1154 **Block: 292198201091039**
1155 **Block: 292198201091043**
1156 **Block: 292198201091044**
1157 **Block: 292198201092005**
1158 **Block: 292198201092006**
1159 **Block: 292198201092007**
1160 **Block: 292198201092011**
1161 **Block: 292198201092012**
1162 **Block: 292198201092013**
1163 **Block: 292198201092014**
1164 **Block: 292198201092015**
1165 **Block: 292198201092017**
1166 **Block: 292198201092019**

HCS HB 2909

59

1167 **Block: 292198201092022**
1168 **Block: 292198201092023**
1169 **Block: 292198201092024**
1170 **Block: 292198201092025**
1171 **Block: 292198201092026**
1172 **Block: 292198201092027**
1173 **Block: 292198201092028**
1174 **Block: 292198201092029**
1175 **Block: 292198201092030**
1176 **Block: 292198201092032**
1177 **Block: 292198201092033**
1178 **Block: 292198201092035**
1179 **Block: 292198201092036**
1180 **Block: 292198201092037**
1181 **Block: 292198201092038**
1182 **Block: 292198201092039**
1183 **Block: 292198201092040**
1184 **Block: 292198201092042**
1185 **Block: 292198201092044**
1186 **Block: 292198201092045**
1187 **Block: 292198201092046**
1188 **Block: 292198201092047**
1189 **Block: 292198201092048**
1190 **Block: 292198201092049**
1191 **Block: 292198201092050**
1192 **Block: 292198201092051**
1193 **Block: 292198201092052**
1194 **Block: 292198201092053**
1195 **Block: 292198201092054**
1196 **Block: 292198201092055**
1197 **Block: 292198201092056**
1198 **Block: 292198201092057**
1199 **Block: 292198201092058**
1200 **Block: 292198201092059**
1201 **Block: 292198201092060**
1202 **Block: 292198201092061**
1203 **Block: 292198201092062**

HCS HB 2909

60

1204 **Block: 292198201092063**
1205 **Block: 292198201092064**
1206 **Block: 292198201092065**
1207 **Block: 292198201092066**
1208 **Block: 292198201092067**
1209 **Block: 292198201092068**
1210 **Block: 292198201092069**
1211 **Block: 292198201092070**
1212 **Block: 292198201092071**
1213 **Block: 292198201092072**
1214 **Block: 292198201092073**
1215 **Block: 292198201092074**
1216 **Block: 292198201092075**
1217 **Block: 292198201092076**
1218 **Block: 292198201092077**
1219 **Block: 292198201092078**
1220 **Block: 292198201092079**
1221 **Block: 292198201092080**
1222 **Block: 292198201092081**
1223 **Block: 292198201092082**
1224 **Block: 292198201092083**
1225 **Block: 292198201092084**
1226 **Block: 292198201092085**
1227 **VTD: Pendleton**
1228 **Block: 292198201041099**
1229 **Block: 292198201041125**
1230 **Block: 292198201042000**
1231 **Block: 292198201042001**
1232 **Block: 292198201042002**
1233 **Block: 292198201042003**
1234 **Block: 292198201042004**
1235 **Block: 292198201042005**
1236 **Block: 292198201042006**
1237 **Block: 292198201042007**
1238 **Block: 292198201042008**
1239 **Block: 292198201042009**
1240 **Block: 292198201042010**

HCS HB 2909

61

1241 **Block: 292198201042011**
1242 **Block: 292198201042012**
1243 **Block: 292198201042013**
1244 **Block: 292198201042014**
1245 **Block: 292198201042015**
1246 **Block: 292198201042016**
1247 **Block: 292198201042017**
1248 **Block: 292198201042018**
1249 **Block: 292198201042019**
1250 **Block: 292198201042020**
1251 **Block: 292198201042021**
1252 **Block: 292198201042022**
1253 **Block: 292198201042023**
1254 **Block: 292198201042024**
1255 **Block: 292198201042025**
1256 **Block: 292198201042026**
1257 **Block: 292198201042027**
1258 **Block: 292198201042028**
1259 **Block: 292198201042029**
1260 **Block: 292198201042030**
1261 **Block: 292198201042031**
1262 **Block: 292198201042032**
1263 **Block: 292198201042033**
1264 **Block: 292198201042034**
1265 **Block: 292198201042035**
1266 **Block: 292198201042036**
1267 **Block: 292198201042037**
1268 **Block: 292198201042038**
1269 **Block: 292198201042039**
1270 **Block: 292198201042040**
1271 **Block: 292198201042041**
1272 **Block: 292198201042042**
1273 **Block: 292198201042043**
1274 **Block: 292198201042044**
1275 **Block: 292198201042045**
1276 **Block: 292198201042046**
1277 **Block: 292198201042047**

HCS HB 2909

62

1278 **Block: 292198201042048**
1279 **Block: 292198201042049**
1280 **Block: 292198201042050**
1281 **Block: 292198201042051**
1282 **Block: 292198201042052**
1283 **Block: 292198201042053**
1284 **Block: 292198201042054**
1285 **Block: 292198201042055**
1286 **Block: 292198201042056**
1287 **Block: 292198201042057**
1288 **Block: 292198201042058**
1289 **Block: 292198201042059**
1290 **Block: 292198201042060**
1291 **Block: 292198201042061**
1292 **Block: 292198201042062**
1293 **Block: 292198201042063**
1294 **Block: 292198201042064**
1295 **Block: 292198201042065**
1296 **Block: 292198201042066**
1297 **Block: 292198201042067**
1298 **Block: 292198201042068**
1299 **Block: 292198201042069**
1300 **Block: 292198201042070**
1301 **Block: 292198201042071**
1302 **Block: 292198201042072**
1303 **Block: 292198201042073**
1304 **Block: 292198201042074**
1305 **Block: 292198201042075**
1306 **Block: 292198201042076**
1307 **Block: 292198201042077**
1308 **Block: 292198201042078**
1309 **Block: 292198201042079**
1310 **Block: 292198201042080**
1311 **Block: 292198201042081**
1312 **Block: 292198201061001**
1313 **Block: 292198201061002**
1314 **Block: 292198201061003**

HCS HB 2909

63

1315 **Block: 292198201061004**
1316 **Block: 292198201061005**
1317 **Block: 292198201061006**
1318 **Block: 292198201061007**
1319 **Block: 292198201061008**
1320 **Block: 292198201061010**
1321 **Block: 292198201061016**
1322 **Block: 292198201061017**
1323 **Block: 292198201061018**
1324 **Block: 292198201061019**
1325 **Block: 292198201061020**
1326 **Block: 292198201061025**
1327 **Block: 292198201061026**
1328 **Block: 292198201061027**
1329 **Block: 292198201061028**
1330 **Block: 292198201061029**
1331 **Block: 292198201061030**
1332 **Block: 292198201061035**
1333 **Block: 292198201061036**
1334 **Block: 292198201061037**
1335 **Block: 292198201061041**
1336 **Block: 292198201061045**
1337 **Block: 292198201061056**
1338 **Block: 292198201061057**
1339 **VTD: Smith Creek**
1340 **VTD: South Hickory Grove**
1341 **VTD: Truesdale**
1342 **VTD: Walnut Grove**
1343 **VTD: Warrenton Ward 1**
1344 **VTD: Warrenton Ward 2**
1345 **Block: 292198201061009**
1346 **Block: 292198201061011**
1347 **Block: 292198201061012**
1348 **Block: 292198201061013**
1349 **Block: 292198201061014**
1350 **Block: 292198201061015**
1351 **Block: 292198201061021**

HCS HB 2909

64

1352 **Block: 292198201061022**
1353 **Block: 292198201061023**
1354 **Block: 292198201061024**
1355 **Block: 292198201061031**
1356 **Block: 292198201061032**
1357 **Block: 292198201061033**
1358 **Block: 292198201061034**
1359 **Block: 292198201061046**
1360 **Block: 292198201061047**
1361 **Block: 292198201061048**
1362 **Block: 292198201061049**
1363 **Block: 292198201061050**
1364 **Block: 292198201061051**
1365 **Block: 292198201061052**
1366 **Block: 292198201061053**
1367 **Block: 292198201061054**
1368 **Block: 292198201061055**
1369 **VTD: Warrenton Ward 3**
1370 **Block: 292198201071012**
1371 **Block: 292198201071013**
1372 **Block: 292198201071015**
1373 **Block: 292198201071016**
1374 **Block: 292198201071017**
1375 **Block: 292198201071018**
1376 **Block: 292198201071019**
1377 **Block: 292198201071020**
1378 **Block: 292198201071022**
1379 **Block: 292198201071023**
1380 **Block: 292198201071024**
1381 **Block: 292198201071025**
1382 **Block: 292198201071026**
1383 **Block: 292198201071027**
1384 **Block: 292198201071028**
1385 **Block: 292198201071029**
1386 **Block: 292198201071030**
1387 **Block: 292198201071048**
1388 **Block: 292198201071049**

HCS HB 2909

65

1389 **Block: 292198201071050**
 1390 **Block: 292198201071055**
 1391 **VTD: Wright City Ward 1**
 1392 **Block: 292198201091000**
 1393 **Block: 292198201091002**
 1394 **Block: 292198201091003**
 1395 **Block: 292198201091004**
 1396 **Block: 292198201091005**
 1397 **Block: 292198201091006**
 1398 **Block: 292198201091008**
 1399 **Block: 292198201091009**
 1400 **Block: 292198201091010**
 1401 **Block: 292198201091011**
 1402 **Block: 292198201091012**
 1403 **Block: 292198201091013**
 1404 **Block: 292198201091014**
 1405 **Block: 292198201091015**
 1406 **Block: 292198201091016**
 1407 **Block: 292198201091017**
 1408 **Block: 292198201091018**
 1409 **Block: 292198201091019**
 1410 **Block: 292198201091020**
 1411 **Block: 292198201091021**
 1412 **Block: 292198201091022**
 1413 **Block: 292198201091023**
 1414 **Block: 292198201091040**
 1415 **Block: 292198201091041**
 1416 **Block: 292198201091042**
 1417 **Block: 292198201091045**
 1418 **Block: 292198201091046**
 1419 **Block: 292198201092001**
 1420 **Block: 292198201092002**
 1421 **Block: 292198201092003**
 1422 **Block: 292198201092004**
 1423 **Block: 292198201092041**
 1424 **VTD: Wright City Ward 2**

128.463. The third congressional district shall be composed of the following:

HCS HB 2909

66

2 **County: Boone MO**
3 **VTD: 18**
4 **Block: 290190018033008**
5 **Block: 290190018033009**
6 **Block: 290190018033010**
7 **Block: 290190018033011**
8 **Block: 290190018033012**
9 **Block: 290190018033013**
10 **Block: 290190018033014**
11 **Block: 290190018033015**
12 **Block: 290190018033016**
13 **Block: 290190018033017**
14 **Block: 290190018033018**
15 **Block: 290190018033019**
16 **Block: 290190018033020**
17 **Block: 290190018033021**
18 **Block: 290190018033022**
19 **Block: 290190018033023**
20 **Block: 290190018033024**
21 **Block: 290190018033025**
22 **Block: 290190018033026**
23 **Block: 290190018033027**
24 **Block: 290190018033028**
25 **Block: 290190018033029**
26 **Block: 290190018033030**
27 **Block: 290190018033031**
28 **Block: 290190018033032**
29 **Block: 290190018033033**
30 **Block: 290190018033034**
31 **Block: 290190018033035**
32 **Block: 290190018033036**
33 **Block: 290190018033037**
34 **Block: 290190018033038**
35 **Block: 290190018033039**
36 **Block: 290190018033040**
37 **Block: 290190018033041**
38 **Block: 290190018033044**

HCS HB 2909

67

39 **Block: 290190018033045**
40 **Block: 290190018033046**
41 **Block: 290190018033047**
42 **Block: 290190018033048**
43 **Block: 290190018033049**
44 **Block: 290190018062008**
45 **Block: 290190018062009**
46 **Block: 290190018062010**
47 **Block: 290190018062011**
48 **Block: 290190018062013**
49 **Block: 290190018062014**
50 **Block: 290190018062046**
51 **Block: 290190018062047**
52 **VTD: 1B**
53 **VTD: 1E**
54 **VTD: 1I**
55 **VTD: 1M**
56 **Block: 290190005001000**
57 **Block: 290190005001001**
58 **Block: 290190005001002**
59 **Block: 290190005001003**
60 **Block: 290190005001004**
61 **Block: 290190005001005**
62 **Block: 290190005001006**
63 **Block: 290190005001007**
64 **Block: 290190005001008**
65 **Block: 290190005001009**
66 **Block: 290190005002000**
67 **Block: 290190005002001**
68 **Block: 290190005002002**
69 **Block: 290190005002003**
70 **Block: 290190005002004**
71 **Block: 290190005002005**
72 **Block: 290190005002006**
73 **Block: 290190005002007**
74 **Block: 290190005002008**
75 **Block: 290190005002009**

HCS HB 2909

68

76 **Block: 290190005002010**
77 **Block: 290190005002011**
78 **Block: 290190005002012**
79 **Block: 290190005002013**
80 **Block: 290190005002014**
81 **Block: 290190005002016**
82 **Block: 290190005002017**
83 **Block: 290190005002018**
84 **Block: 290190005002019**
85 **Block: 290190005002020**
86 **Block: 290190005002023**
87 **Block: 290190005002028**
88 **Block: 290190005003000**
89 **Block: 290190005003001**
90 **Block: 290190005003002**
91 **VTD: 21**
92 **Block: 290190018061001**
93 **Block: 290190018061002**
94 **Block: 290190018061003**
95 **Block: 290190018061004**
96 **Block: 290190018061007**
97 **Block: 290190018061008**
98 **Block: 290190018061009**
99 **Block: 290190018061010**
100 **Block: 290190018061011**
101 **Block: 290190018061012**
102 **Block: 290190018061016**
103 **Block: 290190018061017**
104 **Block: 290190018071011**
105 **Block: 290190018071012**
106 **Block: 290190018071013**
107 **Block: 290190018071014**
108 **Block: 290190018071015**
109 **Block: 290190018071016**
110 **Block: 290190018071022**
111 **Block: 290190018071023**
112 **Block: 290190018071024**

HCS HB 2909

69

113 **Block: 290190018071025**
114 **Block: 290190018071026**
115 **Block: 290190018071027**
116 **Block: 290190018071028**
117 **Block: 290190018072012**
118 **Block: 290190018072014**
119 **Block: 290190018072017**
120 **Block: 290190018072018**
121 **Block: 290190018072022**
122 **Block: 290190018072023**
123 **VTD: 25**
124 **Block: 290190016021018**
125 **Block: 290190016021019**
126 **Block: 290190016021020**
127 **Block: 290190016021021**
128 **Block: 290190016021022**
129 **Block: 290190016021023**
130 **Block: 290190016021024**
131 **Block: 290190016021025**
132 **Block: 290190016021026**
133 **Block: 290190016021027**
134 **Block: 290190016021028**
135 **Block: 290190016021029**
136 **Block: 290190016021030**
137 **Block: 290190016021031**
138 **Block: 290190016021032**
139 **Block: 290190016021033**
140 **Block: 290190016021036**
141 **Block: 290190016021037**
142 **Block: 290190016022000**
143 **Block: 290190016022023**
144 **Block: 290190016022024**
145 **Block: 290190016023031**
146 **Block: 290190016023032**
147 **Block: 290190016023033**
148 **Block: 290190016023035**
149 **Block: 290190016023036**

HCS HB 2909

70

150 **VTD: 26**
151 **VTD: 27**
152 **VTD: 28**
153 **VTD: 29**
154 **VTD: 2K**
155 **Block: 290190018072001**
156 **Block: 290190018072002**
157 **Block: 290190018072003**
158 **Block: 290190018072004**
159 **Block: 290190018072005**
160 **Block: 290190018072006**
161 **Block: 290190018072007**
162 **Block: 290190018072008**
163 **Block: 290190018072010**
164 **VTD: 30**
165 **VTD: 31**
166 **VTD: 32**
167 **VTD: 33**
168 **VTD: 34**
169 **VTD: 35**
170 **VTD: 36**
171 **VTD: 37**
172 **VTD: 38**
173 **Block: 290190018033000**
174 **Block: 290190018033001**
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184 **Block: 290190018033051**
185 **Block: 290190018062000**
186 **Block: 290190018062001**

HCS HB 2909

71

187 **Block: 290190018062002**
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189 **Block: 290190018062004**
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215 **Block: 290190018062038**
216 **Block: 290190018062054**
217 **VTD: 3E**
218 **VTD: 3M**
219 **VTD: 41**
220 **Block: 290190010031006**
221 **Block: 290190010031008**
222 **Block: 290190010031009**
223 **Block: 290190010031014**

HCS HB 2909

72

224 **Block: 290190010031016**
225 **Block: 290190010031018**
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236 **Block: 290190010031046**
237 **Block: 290190010031052**
238 **VTD: 42**
239 **VTD: 43**
240 **VTD: 44**
241 **VTD: 4A**
242 **VTD: 4B**
243 **VTD: 4C**
244 **VTD: 4D**
245 **VTD: 4E**
246 **VTD: 4F**
247 **VTD: 4G**
248 **VTD: 4H**
249 **VTD: 4I**
250 **VTD: 4J**
251 **VTD: 4K**
252 **VTD: 4L**
253 **VTD: 4M**
254 **VTD: 5A**
255 **VTD: 5B**
256 **VTD: 5C**
257 **VTD: 5D**
258 **VTD: 5E**
259 **VTD: 5F**
260 **VTD: 5G**

HCS HB 2909

73

261 **VTD: 5H**
262 **VTD: 5I**
263 **VTD: 5J**
264 **VTD: 5K**
265 **VTD: 5L**
266 **VTD: 5M**
267 **VTD: 5N**
268 **VTD: 5P**
269 **VTD: 6A**
270 **VTD: 6B**
271 **VTD: 6C**
272 **VTD: 6D**
273 **VTD: 6E**
274 **VTD: 6F**
275 **VTD: 6G**
276 **VTD: 6H**
277 **VTD: 6I**
278 **VTD: 6J**
279 **VTD: 6K**
280 **VTD: 6L**
281 **VTD: 6M**
282 **County: Callaway MO**
283 **County: Camden MO**
284 **VTD: Horseshoe Bend**
285 **VTD: Osage Beach 1**
286 **VTD: Osage Beach 2**
287 **VTD: Osage Beach 3**
288 **Block: 290299502011034**
289 **Block: 290299502011056**
290 **Block: 290299502011057**
291 **Block: 290299502011058**
292 **Block: 290299502011059**
293 **Block: 290299502011061**
294 **Block: 290299502011062**
295 **Block: 290299502011064**
296 **Block: 290299502011065**
297 **Block: 290299502012000**

HCS HB 2909

74

298 **Block: 290299502012003**
299 **Block: 290299502012005**
300 **Block: 290299502012012**
301 **Block: 290299502012013**
302 **Block: 290299502012014**
303 **Block: 290299502012015**
304 **Block: 290299502012016**
305 **Block: 290299502012018**
306 **Block: 290299502012019**
307 **Block: 290299502012020**
308 **Block: 290299502012021**
309 **Block: 290299502012024**
310 **Block: 290299502012025**
311 **Block: 290299502012026**
312 **Block: 290299502012048**
313 **Block: 290299502013019**
314 **Block: 290299502023033**
315 **VTD: Sunrise Beach 1**
316 **VTD: Sunrise Beach 3**
317 **Block: 290299511011055**
318 **Block: 290299511021005**
319 **Block: 290299511021017**
320 **Block: 290299511021018**
321 **Block: 290299511021019**
322 **Block: 290299511021020**
323 **Block: 290299511022000**
324 **Block: 290299511022001**
325 **Block: 290299512021002**
326 **Block: 290299512021003**
327 **Block: 290299512021004**
328 **Block: 290299512021005**
329 **Block: 290299512021044**
330 **Block: 290299512021045**
331 **Block: 290299512021046**
332 **Block: 290299512021065**
333 **Block: 290299512021066**
334 **Block: 290299512021072**

HCS HB 2909

75

335 **Block: 290299512021096**
336 **County: Cole MO**
337 **County: Cooper MO**
338 **County: Crawford MO**
339 **County: Gasconade MO**
340 **County: Jefferson MO**
341 **VTD: Brennan**
342 **Block: 290997002111020**
343 **Block: 290997002111021**
344 **Block: 290997003032017**
345 **Block: 290997003051001**
346 **Block: 290997003051003**
347 **Block: 290997003052001**
348 **Block: 290997003052002**
349 **Block: 290997003052003**
350 **Block: 290997003052004**
351 **Block: 290997003052005**
352 **Block: 290997003052025**
353 **VTD: Byrnes Mill W-1**
354 **VTD: Byrnes Mill W-2**
355 **VTD: Byrnes Mill W-3**
356 **VTD: Byrnesville**
357 **VTD: Cedar Hill**
358 **VTD: Cedar Hill Lakes**
359 **VTD: De Soto W-1**
360 **VTD: De Soto W-2**
361 **VTD: De Soto W-3**
362 **VTD: De Soto W-4**
363 **VTD: Dulin Creek**
364 **VTD: Goldman**
365 **VTD: Grubville**
366 **VTD: Grubville 2**
367 **VTD: High Ridge**
368 **VTD: Hillsboro W-1**
369 **VTD: Hillsboro W-2**
370 **VTD: Hillsboro W-3**
371 **VTD: Hillsboro W-4**

HCS HB 2909

76

372 **VTD: Hoene Springs**
373 **VTD: House Springs**
374 **VTD: Lake Tekawitha**
375 **VTD: Lake Tishomingo**
376 **VTD: Meramec Valley**
377 **VTD: North Jefferson**
378 **Block: 290997002062004**
379 **Block: 290997002062005**
380 **Block: 290997002072000**
381 **Block: 290997002072001**
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383 **Block: 290997002072003**
384 **Block: 290997002072004**
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390 **Block: 290997002072010**
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392 **Block: 290997002072012**
393 **Block: 290997002072013**
394 **Block: 290997002072014**
395 **Block: 290997002072017**
396 **Block: 290997002072018**
397 **Block: 290997002072019**
398 **Block: 290997002072020**
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403 **Block: 290997002072025**
404 **Block: 290997002111019**
405 **Block: 290997002113004**
406 **Block: 290997002113005**
407 **Block: 290997002113006**
408 **Block: 290997002113007**

HCS HB 2909

77

409 **Block: 290997002113008**
410 **Block: 290997002113009**
411 **Block: 290997002113012**
412 **Block: 290997002113013**
413 **Block: 290997002113014**
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415 **Block: 290997002113016**
416 **Block: 290997002113017**
417 **Block: 290997002113019**
418 **Block: 290997003022000**
419 **Block: 290997003022001**
420 **Block: 290997003022002**
421 **Block: 290997003022015**
422 **Block: 290997003023002**
423 **Block: 290997003063001**
424 **Block: 290997003063003**
425 **Block: 290997003063004**
426 **Block: 290997003063005**
427 **VTD: Northwest**
428 **VTD: Parkdale**
429 **VTD: Peaceful Village**
430 **VTD: Raintree**
431 **VTD: Rockwood**
432 **VTD: Scotsdale**
433 **VTD: Valle**
434 **Block: 290997010023040**
435 **Block: 290997010023041**
436 **Block: 290997012006047**
437 **Block: 290997012006053**
438 **Block: 290997012006056**
439 **Block: 290997012006061**
440 **Block: 290997012006062**
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442 **Block: 290997013001002**
443 **Block: 290997013001003**
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445 **Block: 290997013001055**

HCS HB 2909

78

446 **Block: 290997013001062**
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452 **Block: 290997013001070**
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454 **Block: 290997013001077**
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463 **Block: 290997013003022**
464 **Block: 290997014012008**
465 **Block: 290997014012009**
466 **Block: 290997014012017**
467 **Block: 290997014012021**
468 **Block: 290997014012022**
469 **Block: 290997014012023**
470 **Block: 290997014012064**
471 **Block: 290997014012065**
472 **Block: 290997014012066**
473 **Block: 290997014012067**
474 **VTD: Victoria**
475 **Block: 290997010011036**
476 **Block: 290997010013008**
477 **Block: 290997010013032**
478 **Block: 290997010013033**
479 **Block: 290997010021020**
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481 **Block: 290997010021023**
482 **Block: 290997010021024**

HCS HB 2909

79

483 **Block: 290997010022000**
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519 **Block: 290997010023026**

HCS HB 2909

80

520 **Block: 290997010023027**
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528 **Block: 290997012001028**
529 **Block: 290997012001029**
530 **Block: 290997012001030**
531 **VTD: Vineland**
532 **VTD: Ware**
533 **County: Maries MO**
534 **County: Miller MO**
535 **County: Moniteau MO**
536 **County: Montgomery MO**
537 **County: Osage MO**
538 **County: St. Charles MO**
539 **VTD: Adams**
540 **VTD: All Saints**
541 **Block: 291833117352019**
542 **Block: 291833117391011**
543 **Block: 291833117391012**
544 **VTD: Arlington**
545 **VTD: Aspen**
546 **VTD: Briarhill**
547 **VTD: Bryan**
548 **VTD: Canary**
549 **VTD: Cave Springs**
550 **VTD: Cedar**
551 **VTD: Cheshire**
552 **VTD: Civic**
553 **VTD: Claybrook**
554 **VTD: Coachman**
555 **VTD: Community**
556 **Block: 291833120031006**

HCS HB 2909

81

557 **Block: 291833120031007**
558 **Block: 291833120031008**
559 **Block: 291833120031009**
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587 **Block: 291833120032073**
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593 **Block: 291833121921008**

HCS HB 2909

82

594 **Block: 291833121921017**
595 **Block: 291833121921018**
596 **Block: 291833121921032**
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HCS HB 2909

83

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HCS HB 2909

84

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HCS HB 2909

85

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741 **Block: 291833121952055**

HCS HB 2909

86

742 **Block: 291833121952056**
743 **Block: 291833121952057**
744 **Block: 291833121952058**
745 **VTD: Cottleville**
746 **VTD: Country Hill**
747 **VTD: Coverdell**
748 **VTD: Covilli**
749 **VTD: Discovery**
750 **Block: 291833117351000**
751 **Block: 291833117351001**
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753 **Block: 291833117351003**
754 **Block: 291833117351004**
755 **Block: 291833117351005**
756 **Block: 291833117351006**
757 **Block: 291833117351007**
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763 **Block: 291833117351013**
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766 **Block: 291833117351016**
767 **Block: 291833117352000**
768 **Block: 291833117352017**
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770 **Block: 291833117352021**
771 **Block: 291833117352023**
772 **VTD: Edgewood**
773 **VTD: Elks**
774 **VTD: Evergreen**
775 **VTD: Fairmount**
776 **VTD: Fairview**
777 **VTD: Fairways**
778 **VTD: Flint Hill**

HCS HB 2909

87

779 **VTD: Foristell**
780 **Block: 291833120031000**
781 **Block: 291833120031001**
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783 **Block: 291833120031003**
784 **Block: 291833120031004**
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786 **Block: 291833120031019**
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807 **Block: 291833120032016**
808 **Block: 291833120032017**
809 **Block: 291833120032018**
810 **Block: 291833120032019**
811 **Block: 291833120032020**
812 **Block: 291833120032021**
813 **Block: 291833120032022**
814 **Block: 291833120032023**
815 **Block: 291833120032024**

HCS HB 2909

88

816 **Block: 291833120032025**
817 **Block: 291833120032026**
818 **Block: 291833120032027**
819 **Block: 291833120032028**
820 **Block: 291833120032029**
821 **Block: 291833120032030**
822 **Block: 291833120032031**
823 **Block: 291833120032032**
824 **Block: 291833120032033**
825 **Block: 291833120032034**
826 **Block: 291833120032035**
827 **Block: 291833120032036**
828 **Block: 291833120032037**
829 **Block: 291833120032038**
830 **Block: 291833120032039**
831 **Block: 291833120032040**
832 **Block: 291833120032041**
833 **Block: 291833120032042**
834 **Block: 291833120032043**
835 **Block: 291833120032044**
836 **Block: 291833120032045**
837 **Block: 291833120032046**
838 **Block: 291833120032047**
839 **Block: 291833120032048**
840 **Block: 291833120032049**
841 **Block: 291833120032050**
842 **Block: 291833120032051**
843 **Block: 291833120032052**
844 **Block: 291833120032053**
845 **Block: 291833120032057**
846 **Block: 291833120032066**
847 **Block: 291833120032067**
848 **Block: 291833120032068**
849 **Block: 291833120032092**
850 **VTD: Fox**
851 **VTD: Glengate**
852 **Block: 291833117382025**

HCS HB 2909

89

853 **VTD: Government**
854 **VTD: Graybridge**
855 **VTD: Green Forest**
856 **VTD: Hanover**
857 **VTD: Harmony**
858 **VTD: Harvester**
859 **VTD: Heritage**
860 **VTD: Hi Point**
861 **VTD: Highgrove**
862 **VTD: Hillcrest**
863 **Block: 291833117323000**
864 **Block: 291833117323005**
865 **Block: 291833117324000**
866 **Block: 291833117324001**
867 **Block: 291833117324002**
868 **Block: 291833117324003**
869 **Block: 291833117324004**
870 **Block: 291833117324005**
871 **Block: 291833117324006**
872 **Block: 291833117324007**
873 **Block: 291833117324008**
874 **Block: 291833117324009**
875 **Block: 291833117324010**
876 **Block: 291833117324011**
877 **Block: 291833117324012**
878 **Block: 291833117324013**
879 **Block: 291833117324016**
880 **Block: 291833117324021**
881 **Block: 291833117324022**
882 **Block: 291833117324023**
883 **Block: 291833117324024**
884 **Block: 291833117324025**
885 **Block: 291833117324026**
886 **Block: 291833117324027**
887 **Block: 291833117324028**
888 **Block: 291833117324029**
889 **Block: 291833117324030**

HCS HB 2909

90

890 **Block: 291833117324031**
891 **Block: 291833117324032**
892 **Block: 291833117352001**
893 **Block: 291833117352003**
894 **Block: 291833117352004**
895 **Block: 291833117352005**
896 **Block: 291833117352006**
897 **Block: 291833117352007**
898 **Block: 291833117352008**
899 **Block: 291833117352009**
900 **Block: 291833117352010**
901 **Block: 291833117352011**
902 **Block: 291833117352012**
903 **Block: 291833117352013**
904 **Block: 291833117352014**
905 **Block: 291833117352015**
906 **Block: 291833117352022**
907 **Block: 291833117352024**
908 **Block: 291833117354005**
909 **VTD: Josephville**
910 **VTD: Kampville**
911 **VTD: Katy Trail**
912 **VTD: Lakes**
913 **VTD: Laura Hill**
914 **VTD: Lincoln**
915 **VTD: Mamelle**
916 **VTD: Marina**
917 **VTD: McClay**
918 **VTD: McNair**
919 **VTD: Meadow Valley**
920 **VTD: Mid Rivers**
921 **VTD: Montbrook**
922 **VTD: Montclair**
923 **VTD: Morningside**
924 **VTD: Mount Hope**
925 **VTD: Normandy**
926 **VTD: Oak Creek**

HCS HB 2909

91

927 **VTD: Oaks**
928 **VTD: Orchard Farm**
929 **VTD: Parkwood**
930 **VTD: Peine**
931 **VTD: Pitman**
932 **VTD: Rabbit Run**
933 **VTD: Regatta Bay**
934 **Block: 291833119031001**
935 **Block: 291833119031003**
936 **Block: 291833119031021**
937 **Block: 291833119031022**
938 **Block: 291833119091006**
939 **Block: 291833119091008**
940 **Block: 291833119091009**
941 **Block: 291833119091010**
942 **Block: 291833119091011**
943 **Block: 291833119091012**
944 **Block: 291833119091013**
945 **Block: 291833119091014**
946 **Block: 291833119091015**
947 **Block: 291833119091016**
948 **Block: 291833119091017**
949 **Block: 291833119091018**
950 **Block: 291833119091019**
951 **Block: 291833119091020**
952 **Block: 291833119091021**
953 **Block: 291833119091022**
954 **Block: 291833119091023**
955 **Block: 291833119091024**
956 **Block: 291833119092001**
957 **Block: 291833119092003**
958 **Block: 291833119092004**
959 **Block: 291833119092005**
960 **Block: 291833119092006**
961 **Block: 291833119092007**
962 **Block: 291833119092008**
963 **Block: 291833119092009**

HCS HB 2909

92

964 **Block: 291833119092010**
965 **Block: 291833119092011**
966 **Block: 291833119092012**
967 **Block: 291833119092013**
968 **Block: 291833119092016**
969 **Block: 291833119092017**
970 **Block: 291833119092018**
971 **Block: 291833119092019**
972 **Block: 291833119092020**
973 **Block: 291833119092021**
974 **Block: 291833119092022**
975 **Block: 291833119092023**
976 **Block: 291833119092024**
977 **Block: 291833119092025**
978 **Block: 291833119092026**
979 **Block: 291833119092027**
980 **Block: 291833119092028**
981 **Block: 291833119092029**
982 **Block: 291833119092030**
983 **Block: 291833119092031**
984 **Block: 291833119092032**
985 **Block: 291833119092033**
986 **VTD: River Bend**
987 **VTD: Rivers**
988 **VTD: Salt Lick**
989 **VTD: Shadow Creek**
990 **VTD: Shirewood**
991 **VTD: Shoshone**
992 **VTD: Sibley**
993 **VTD: Spencer**
994 **VTD: St. Andrews**
995 **VTD: St. Cletus**
996 **VTD: St. Jude**
997 **VTD: St. Marys**
998 **VTD: St. Paul**
999 **VTD: Sun Lake**
1000 **VTD: Sunny Hill**

HCS HB 2909

93

1001 **VTD: Sycamore**
1002 **VTD: Tanglewood**
1003 **VTD: Timberwood**
1004 **VTD: Treetop**
1005 **VTD: Truman**
1006 **VTD: Washington**
1007 **VTD: Wheatfield**
1008 **VTD: Whitmoor**
1009 **VTD: Wilshire**
1010 **VTD: Windcastle**
1011 **VTD: Winds**
1012 **VTD: Wolfrum**
1013 **VTD: Woodcliff**
1014 **VTD: Woodglen**
1015 **VTD: Woodstream**
1016 **County: Warren MO**
1017 **VTD: Elkhorn North**
1018 **VTD: North Hickory Grove**
1019 **Block: 292198201081000**
1020 **Block: 292198201081001**
1021 **Block: 292198201081002**
1022 **Block: 292198201081003**
1023 **Block: 292198201081004**
1024 **Block: 292198201081005**
1025 **Block: 292198201081007**
1026 **Block: 292198201081008**
1027 **Block: 292198201081009**
1028 **Block: 292198201081010**
1029 **Block: 292198201081011**
1030 **Block: 292198201081012**
1031 **Block: 292198201081013**
1032 **Block: 292198201081014**
1033 **Block: 292198201081015**
1034 **Block: 292198201081016**
1035 **Block: 292198201081017**
1036 **Block: 292198201081018**
1037 **Block: 292198201082000**

HCS HB 2909

94

1038 **Block: 292198201082001**
1039 **Block: 292198201082002**
1040 **Block: 292198201082003**
1041 **Block: 292198201082004**
1042 **Block: 292198201082005**
1043 **Block: 292198201082006**
1044 **Block: 292198201082007**
1045 **Block: 292198201082008**
1046 **Block: 292198201082009**
1047 **Block: 292198201082010**
1048 **Block: 292198201082011**
1049 **Block: 292198201082012**
1050 **Block: 292198201082013**
1051 **Block: 292198201082014**
1052 **Block: 292198201082015**
1053 **Block: 292198201082016**
1054 **Block: 292198201082017**
1055 **Block: 292198201082018**
1056 **Block: 292198201082019**
1057 **Block: 292198201082020**
1058 **Block: 292198201082021**
1059 **Block: 292198201082022**
1060 **Block: 292198201082024**
1061 **Block: 292198201082025**
1062 **Block: 292198201082026**
1063 **Block: 292198201082027**
1064 **Block: 292198201082028**
1065 **Block: 292198201082032**
1066 **Block: 292198201082036**
1067 **Block: 292198201082037**
1068 **Block: 292198201082038**
1069 **Block: 292198201082039**
1070 **Block: 292198201082040**
1071 **Block: 292198201082041**
1072 **Block: 292198201082042**
1073 **Block: 292198201082043**
1074 **Block: 292198201082044**

HCS HB 2909

95

1075	Block: 292198201082045
1076	Block: 292198201082046
1077	Block: 292198201082047
1078	Block: 292198201082048
1079	Block: 292198201082049
1080	Block: 292198201082050
1081	Block: 292198201082051
1082	Block: 292198201082054
1083	Block: 292198201082058
1084	Block: 292198201084000
1085	Block: 292198201084001
1086	Block: 292198201084002
1087	Block: 292198201084003
1088	Block: 292198201084004
1089	Block: 292198201084005
1090	Block: 292198201084006
1091	Block: 292198201084007
1092	Block: 292198201084008
1093	Block: 292198201084009
1094	Block: 292198201084010
1095	Block: 292198201084011
1096	Block: 292198201084012
1097	Block: 292198201084013
1098	Block: 292198201084014
1099	Block: 292198201084015
1100	Block: 292198201084016
1101	Block: 292198201084017
1102	Block: 292198201084018
1103	Block: 292198201084019
1104	Block: 292198201084020
1105	Block: 292198201084021
1106	Block: 292198201084022
1107	Block: 292198201084023
1108	Block: 292198201084024
1109	Block: 292198201084025
1110	Block: 292198201084026
1111	Block: 292198201084027

HCS HB 2909

96

1112 **Block: 292198201084028**
1113 **Block: 292198201084029**
1114 **Block: 292198201084030**
1115 **Block: 292198201084032**
1116 **Block: 292198201084033**
1117 **Block: 292198201092000**
1118 **Block: 292198201092008**
1119 **Block: 292198201092009**
1120 **Block: 292198201092010**
1121 **VTD: Pendleton**
1122 **Block: 292198201041088**
1123 **Block: 292198201041089**
1124 **Block: 292198201041093**
1125 **Block: 292198201041094**
1126 **Block: 292198201041095**
1127 **Block: 292198201041096**
1128 **Block: 292198201041097**
1129 **Block: 292198201041098**
1130 **Block: 292198201041100**
1131 **Block: 292198201041104**
1132 **Block: 292198201041106**
1133 **Block: 292198201041107**
1134 **Block: 292198201041108**
1135 **Block: 292198201041109**
1136 **Block: 292198201041110**
1137 **Block: 292198201041111**
1138 **Block: 292198201041112**
1139 **Block: 292198201041113**
1140 **Block: 292198201041114**
1141 **Block: 292198201041115**
1142 **Block: 292198201041116**
1143 **Block: 292198201041117**
1144 **Block: 292198201041120**
1145 **Block: 292198201041121**
1146 **Block: 292198201041122**
1147 **Block: 292198201041123**
1148 **Block: 292198201041124**

HCS HB 2909

97

1149 **Block: 292198201041127**
1150 **VTD: Warrenton Ward 2**
1151 **Block: 292198201041118**
1152 **Block: 292198201041119**
1153 **Block: 292198201043052**
1154 **Block: 292198201043057**
1155 **Block: 292198201043058**
1156 **Block: 292198201043064**
1157 **Block: 292198201043065**
1158 **Block: 292198201043066**
1159 **Block: 292198201043067**
1160 **Block: 292198201043068**
1161 **Block: 292198201043069**
1162 **Block: 292198201043070**
1163 **Block: 292198201043071**
1164 **Block: 292198201051021**
1165 **Block: 292198201051022**
1166 **Block: 292198201051023**
1167 **Block: 292198201051025**
1168 **Block: 292198201061000**
1169 **VTD: Warrenton Ward 3**
1170 **Block: 292198201051008**
1171 **Block: 292198201051011**
1172 **Block: 292198201051012**
1173 **Block: 292198201051013**
1174 **Block: 292198201051014**
1175 **Block: 292198201051015**
1176 **Block: 292198201051016**
1177 **Block: 292198201051017**
1178 **Block: 292198201051018**
1179 **Block: 292198201051019**
1180 **Block: 292198201051020**
1181 **Block: 292198201051024**
1182 **Block: 292198201052009**
1183 **Block: 292198201052010**
1184 **Block: 292198201052012**
1185 **Block: 292198201052013**

HCS HB 2909

98

1186 **Block: 292198201052014**
1187 **Block: 292198201052015**
1188 **Block: 292198201052016**
1189 **Block: 292198201052017**
1190 **Block: 292198201052019**
1191 **Block: 292198201052020**
1192 **Block: 292198201052021**
1193 **Block: 292198201052022**
1194 **Block: 292198201052032**
1195 **Block: 292198201052033**
1196 **Block: 292198201052034**
1197 **Block: 292198201071014**
1198 **Block: 292198201071056**
1199 **VTD: Weeks**
1200 **VTD: Wright City Ward 1**
1201 **Block: 292198201081019**
1202 **Block: 292198201081020**
1203 **Block: 292198201082023**
1204 **Block: 292198201082029**
1205 **Block: 292198201082030**
1206 **Block: 292198201082031**
1207 **Block: 292198201082033**
1208 **Block: 292198201082034**
1209 **Block: 292198201082035**
1210 **Block: 292198201082052**
1211 **Block: 292198201082053**
1212 **Block: 292198201082055**
1213 **Block: 292198201082056**
1214 **Block: 292198201082057**
1215 **Block: 292198201083000**
1216 **Block: 292198201083001**
1217 **Block: 292198201083002**
1218 **Block: 292198201083003**
1219 **Block: 292198201083004**
1220 **Block: 292198201083005**
1221 **Block: 292198201084031**
1222 **Block: 292198201091001**

HCS HB 2909

99

1223 **Block: 292198201092043**1224 **County: Washington MO****128.464. The fourth congressional district shall be composed of the following:**2 **County: Barton MO**3 **County: Bates MO**4 **County: Benton MO**5 **County: Boone MO**6 **VTD: 07**7 **VTD: 08**8 **VTD: 09**9 **VTD: 10**10 **VTD: 11**11 **VTD: 12**12 **VTD: 15**13 **VTD: 16**14 **VTD: 17**15 **VTD: 18**16 **Block: 290190018032015**17 **Block: 290190018032016**18 **Block: 290190018032018**19 **Block: 290190018032033**20 **Block: 290190018032034**21 **Block: 290190018032035**22 **Block: 290190018032036**23 **Block: 290190018032040**24 **Block: 290190018032041**25 **Block: 290190018032042**26 **Block: 290190018032043**27 **Block: 290190018032044**28 **VTD: 19**29 **VTD: 1A**30 **VTD: 1C**31 **VTD: 1D**32 **VTD: 1F**33 **VTD: 1G**34 **VTD: 1J**35 **VTD: 1K**

HCS HB 2909

100

36 **VTD: 1L**
37 **VTD: 1M**
38 **Block: 290190021003001**
39 **Block: 290190021003019**
40 **Block: 290190021003020**
41 **Block: 290190021003021**
42 **Block: 290190021003031**
43 **Block: 290190021003032**
44 **Block: 290190021003033**
45 **Block: 290190021003039**
46 **Block: 290190021003040**
47 **VTD: 20**
48 **VTD: 21**
49 **Block: 290190013003003**
50 **Block: 290190013003004**
51 **Block: 290190013003006**
52 **Block: 290190013003008**
53 **Block: 290190013003009**
54 **Block: 290190013003023**
55 **Block: 290190018072000**
56 **VTD: 22**
57 **VTD: 23**
58 **VTD: 24**
59 **VTD: 25**
60 **Block: 290190016023003**
61 **VTD: 2A**
62 **VTD: 2B**
63 **VTD: 2C**
64 **VTD: 2D**
65 **VTD: 2F**
66 **VTD: 2G**
67 **VTD: 2H**
68 **VTD: 2I**
69 **VTD: 2J**
70 **VTD: 2K**
71 **Block: 290190013003002**
72 **Block: 290190013003005**

HCS HB 2909

101

73 **Block: 290190013003007**
74 **Block: 290190013003010**
75 **Block: 290190013003024**
76 **Block: 290190013003025**
77 **Block: 290190013003026**
78 **Block: 290190013003027**
79 **VTD: 2L**
80 **VTD: 38**
81 **Block: 290190018032038**
82 **Block: 290190018032039**
83 **VTD: 39**
84 **VTD: 3A**
85 **VTD: 3B**
86 **VTD: 3C**
87 **VTD: 3D**
88 **VTD: 3F**
89 **VTD: 3G**
90 **VTD: 3H**
91 **VTD: 3I**
92 **VTD: 3J**
93 **VTD: 3L**
94 **VTD: 3N**
95 **VTD: 40**
96 **VTD: 41**
97 **Block: 290190015062025**
98 **Block: 290190015062052**
99 **Block: 290190015062056**
100 **Block: 290190015062059**
101 **Block: 290190015062061**
102 **Block: 290190016031013**
103 **Block: 290190016031018**
104 **Block: 290190016031023**
105 **Block: 290190016031027**
106 **Block: 290190016031028**
107 **Block: 290190016031030**
108 **Block: 290190016031038**
109 **Block: 290190016031039**

HCS HB 2909

102

110 **Block: 290190016031040**
111 **Block: 290190016041000**
112 **Block: 290190016041001**
113 **Block: 290190016041002**
114 **Block: 290190016041003**
115 **Block: 290190016041004**
116 **Block: 290190016041006**
117 **Block: 290190016041007**
118 **Block: 290190016041008**
119 **Block: 290190016041009**
120 **Block: 290190016041016**
121 **Block: 290190016041019**
122 **Block: 290190016042000**
123 **Block: 290190016042018**
124 **VTD: 45**
125 **County: Camden MO**
126 **VTD: Barnumton**
127 **VTD: Camdenton 1**
128 **VTD: Camdenton 2**
129 **VTD: Camdenton 3**
130 **VTD: Climax Springs**
131 **VTD: Decaturville**
132 **VTD: Freedom**
133 **VTD: Greenview**
134 **VTD: Ha Ha Tonka**
135 **VTD: Hillhouse**
136 **VTD: Linn Creek**
137 **VTD: Macks Creek**
138 **VTD: Montreal**
139 **VTD: Osage Beach 3**
140 **Block: 290299502011032**
141 **Block: 290299502011033**
142 **Block: 290299502011060**
143 **Block: 290299502011063**
144 **Block: 290299502011066**
145 **Block: 290299502011067**
146 **Block: 290299502011068**

HCS HB 2909

103

147 **Block: 290299502011069**
148 **Block: 290299502011072**
149 **Block: 290299502011073**
150 **Block: 290299502011076**
151 **Block: 290299502012006**
152 **Block: 290299502012007**
153 **Block: 290299502012008**
154 **Block: 290299502012009**
155 **Block: 290299502012010**
156 **Block: 290299502012011**
157 **Block: 290299502012027**
158 **Block: 290299502012028**
159 **Block: 290299502012029**
160 **Block: 290299502012030**
161 **Block: 290299502012031**
162 **Block: 290299502012032**
163 **Block: 290299502012033**
164 **Block: 290299502012034**
165 **Block: 290299502012035**
166 **Block: 290299502012036**
167 **Block: 290299502012037**
168 **Block: 290299502012038**
169 **Block: 290299502012039**
170 **Block: 290299502012040**
171 **Block: 290299502012041**
172 **Block: 290299502012042**
173 **Block: 290299502012043**
174 **Block: 290299502012044**
175 **Block: 290299502012045**
176 **Block: 290299502012046**
177 **Block: 290299502012047**
178 **Block: 290299502012049**
179 **Block: 290299502013028**
180 **Block: 290299502013029**
181 **Block: 290299502013030**
182 **Block: 290299502013031**
183 **Block: 290299502013032**

HCS HB 2909

104

184 **Block: 290299502013033**
185 **Block: 290299502013034**
186 **Block: 290299502013035**
187 **Block: 290299502013036**
188 **Block: 290299502013037**
189 **Block: 290299502013038**
190 **Block: 290299502013039**
191 **Block: 290299502013040**
192 **Block: 290299502013041**
193 **Block: 290299502013042**
194 **Block: 290299502013044**
195 **Block: 290299502023000**
196 **Block: 290299502023001**
197 **Block: 290299502023005**
198 **Block: 290299502023006**
199 **Block: 290299502023007**
200 **Block: 290299502023008**
201 **Block: 290299502023009**
202 **Block: 290299502023010**
203 **Block: 290299502023011**
204 **Block: 290299502023013**
205 **Block: 290299502023014**
206 **Block: 290299502023015**
207 **Block: 290299502023016**
208 **Block: 290299502023017**
209 **Block: 290299502023018**
210 **Block: 290299502023019**
211 **Block: 290299502023020**
212 **Block: 290299502023034**
213 **Block: 290299506002000**
214 **Block: 290299506002001**
215 **Block: 290299506002002**
216 **Block: 290299506002003**
217 **Block: 290299506002004**
218 **Block: 290299506002005**
219 **Block: 290299506002006**
220 **Block: 290299506002007**

HCS HB 2909

105

221 **Block: 290299506002008**
222 **Block: 290299506002009**
223 **Block: 290299506002010**
224 **Block: 290299506002011**
225 **Block: 290299506002014**
226 **Block: 290299506002015**
227 **Block: 290299506002016**
228 **Block: 290299506002019**
229 **Block: 290299506002034**
230 **Block: 290299506002035**
231 **Block: 290299506002036**
232 **VTD: Roach**
233 **VTD: Stoutland**
234 **VTD: Sunny Slope**
235 **VTD: Sunrise Beach 2**
236 **VTD: Sunrise Beach 3**
237 **Block: 290299511021008**
238 **Block: 290299511021009**
239 **Block: 290299511021010**
240 **Block: 290299511021011**
241 **Block: 290299511021012**
242 **Block: 290299511021013**
243 **Block: 290299511021014**
244 **Block: 290299511021015**
245 **Block: 290299511021021**
246 **Block: 290299511021022**
247 **Block: 290299511021023**
248 **Block: 290299511021024**
249 **Block: 290299511021025**
250 **Block: 290299511021026**
251 **Block: 290299511021027**
252 **Block: 290299511021028**
253 **Block: 290299511021029**
254 **Block: 290299511021030**
255 **Block: 290299511021031**
256 **Block: 290299511021032**
257 **Block: 290299511021033**

HCS HB 2909

106

258 **Block: 290299511021034**
259 **Block: 290299511021035**
260 **Block: 290299511021036**
261 **Block: 290299511021037**
262 **Block: 290299511021038**
263 **Block: 290299511021039**
264 **Block: 290299511021040**
265 **Block: 290299511021041**
266 **Block: 290299511021042**
267 **Block: 290299511022003**
268 **Block: 290299511022004**
269 **Block: 290299511022005**
270 **Block: 290299511022006**
271 **Block: 290299511022007**
272 **Block: 290299511022008**
273 **Block: 290299511022009**
274 **Block: 290299511022010**
275 **Block: 290299511022011**
276 **Block: 290299511022012**
277 **Block: 290299511022013**
278 **Block: 290299511022014**
279 **Block: 290299511022015**
280 **Block: 290299511022016**
281 **Block: 290299511022017**
282 **Block: 290299511022018**
283 **Block: 290299511022019**
284 **Block: 290299511022020**
285 **Block: 290299511022021**
286 **Block: 290299511022022**
287 **Block: 290299511022023**
288 **Block: 290299511022024**
289 **Block: 290299511022025**
290 **Block: 290299511022026**
291 **Block: 290299511022027**
292 **Block: 290299511022028**
293 **Block: 290299511022029**
294 **Block: 290299511022030**

HCS HB 2909

107

295 **Block: 290299511022031**
296 **Block: 290299511022032**
297 **Block: 290299511022033**
298 **Block: 290299511022034**
299 **Block: 290299511022035**
300 **Block: 290299511022036**
301 **Block: 290299511022037**
302 **Block: 290299511022038**
303 **Block: 290299511022039**
304 **Block: 290299511022040**
305 **Block: 290299511022041**
306 **Block: 290299511022042**
307 **Block: 290299511022043**
308 **Block: 290299511022044**
309 **Block: 290299511022045**
310 **Block: 290299511022046**
311 **Block: 290299511022047**
312 **Block: 290299511022048**
313 **Block: 290299511022049**
314 **Block: 290299511022050**
315 **Block: 290299511022051**
316 **Block: 290299511022052**
317 **Block: 290299511022053**
318 **Block: 290299511022054**
319 **Block: 290299511022055**
320 **Block: 290299511022056**
321 **Block: 290299511022057**
322 **Block: 290299511022058**
323 **Block: 290299511022059**
324 **Block: 290299511022060**
325 **Block: 290299511022061**
326 **Block: 290299511022062**
327 **Block: 290299512021006**
328 **Block: 290299512021007**
329 **Block: 290299512021008**
330 **Block: 290299512021015**
331 **Block: 290299512021031**

HCS HB 2909

108

332 **Block: 290299512021032**
333 **Block: 290299512021033**
334 **Block: 290299512021034**
335 **Block: 290299512021036**
336 **Block: 290299512021037**
337 **Block: 290299512021038**
338 **Block: 290299512021042**
339 **Block: 290299512021043**
340 **Block: 290299512021067**
341 **Block: 290299512021068**
342 **Block: 290299512021069**
343 **Block: 290299512021070**
344 **Block: 290299512021071**
345 **Block: 290299512021083**
346 **Block: 290299512021084**
347 **Block: 290299512021085**
348 **Block: 290299512021086**
349 **Block: 290299512021087**
350 **Block: 290299512021088**
351 **Block: 290299512021089**
352 **Block: 290299512021090**
353 **Block: 290299512021091**
354 **Block: 290299512021092**
355 **Block: 290299512021093**
356 **Block: 290299512021094**
357 **Block: 290299512021097**
358 **VTD: Wilson Bend**
359 **County: Cass MO**
360 **County: Cedar MO**
361 **County: Dade MO**
362 **County: Dallas MO**
363 **County: Henry MO**
364 **County: Hickory MO**
365 **County: Howard MO**
366 **County: Jackson MO**
367 **VTD: Prairie 52**
368 **VTD: Prairie 56**

HCS HB 2909

109

369 **VTD: Prarie 58**
370 **VTD: Prarie 61**
371 **VTD: Prarie 63**
372 **VTD: Sni-A-Bar 05**
373 **VTD: Sni-A-Bar 07**
374 **VTD: Sni-A-Bar 08**
375 **Block: 290950148042027**
376 **Block: 290950148042028**
377 **Block: 290950148061015**
378 **Block: 290950148061016**
379 **Block: 290950148061017**
380 **Block: 290950148061018**
381 **Block: 290950148062000**
382 **Block: 290950148062001**
383 **Block: 290950148062002**
384 **Block: 290950148062003**
385 **Block: 290950148062004**
386 **Block: 290950148062005**
387 **Block: 290950148062006**
388 **Block: 290950148062007**
389 **Block: 290950148062008**
390 **Block: 290950148062009**
391 **Block: 290950148062010**
392 **Block: 290950148062011**
393 **Block: 290950148062012**
394 **Block: 290950148062013**
395 **Block: 290950148062014**
396 **Block: 290950148062015**
397 **Block: 290950148063000**
398 **Block: 290950148063001**
399 **Block: 290950148063002**
400 **Block: 290950148063003**
401 **Block: 290950148063004**
402 **Block: 290950148063005**
403 **Block: 290950148063006**
404 **Block: 290950148063007**
405 **Block: 290950148063008**

HCS HB 2909

110

406 **Block: 290950148063009**
407 **Block: 290959892001002**
408 **Block: 290959892001003**
409 **Block: 290959892001004**
410 **Block: 290959892001005**
411 **Block: 290959892001006**
412 **VTD: Sni-A-Bar 09**
413 **VTD: Sni-A-Bar 10**
414 **VTD: Sni-A-Bar 11**
415 **VTD: Sni-A-Bar 12**
416 **VTD: Sni-A-Bar 13**
417 **VTD: Sni-A-Bar 14**
418 **VTD: Sni-A-Bar 15**
419 **VTD: Sni-A-Bar 16**
420 **VTD: Sni-A-Bar 20**
421 **VTD: Sni-A-Bar 21**
422 **Block: 290950141272000**
423 **Block: 290950141272005**
424 **VTD: Sni-A-Bar 23**
425 **VTD: Sni-A-Bar 29**
426 **VTD: Sni-A-Bar 30**
427 **VTD: Sni-A-Bar 31**
428 **VTD: Sni-A-Bar 32**
429 **VTD: Sni-A-Bar 33**
430 **VTD: Sni-A-Bar 37**
431 **VTD: Sni-A-Bar 38**
432 **VTD: Sni-A-Bar 39**
433 **VTD: Sni-A-Bar 40**
434 **VTD: Sni-A-Bar 41**
435 **VTD: Sni-A-Bar 42**
436 **VTD: Sni-A-Bar 43**
437 **VTD: Sni-A-Bar 44**
438 **VTD: Sni-A-Bar 45**
439 **VTD: Sni-A-Bar 46**
440 **VTD: Sni-A-Bar 47**
441 **VTD: Sni-A-Bar 48**
442 **VTD: Sni-A-Bar 49**

HCS HB 2909

111

443 **VTD: Sni-A-Bar 50**
444 **Block: 290950149031031**
445 **Block: 290950149031032**
446 **Block: 290950149031064**
447 **VTD: Sni-A-Bar 51**
448 **VTD: Sni-A-Bar 52**
449 **VTD: Sni-A-Bar 83**
450 **VTD: Van Buren 01**
451 **VTD: Van Buren 02**
452 **VTD: Van Buren 03**
453 **VTD: Van Buren 04**
454 **Block: 290950139182011**
455 **Block: 290950139182016**
456 **VTD: Van Buren 07**
457 **VTD: Van Buren 08**
458 **VTD: Van Buren 09**
459 **VTD: Van Buren 10**
460 **VTD: Van Buren 11**
461 **VTD: Van Buren 12**
462 **VTD: Van Buren 13**
463 **VTD: Van Buren 14**
464 **VTD: Van Buren 15**
465 **VTD: Van Buren 16**
466 **VTD: Van Buren 17**
467 **VTD: Van Buren 18**
468 **VTD: Van Buren 19**
469 **County: Johnson MO**
470 **County: Laclede MO**
471 **County: Lafayette MO**
472 **County: Morgan MO**
473 **County: Pettis MO**
474 **County: Polk MO**
475 **County: Pulaski MO**
476 **County: Saline MO**
477 **County: St. Clair MO**
478 **County: Vernon MO**
479 **County: Webster MO**

HCS HB 2909

112

480 **VTD: East Ozark**
481 **VTD: Grant**
482 **Block: 292254701021041**
483 **Block: 292254701021042**
484 **Block: 292254701022000**
485 **Block: 292254701022001**
486 **Block: 292254701022002**
487 **Block: 292254701022003**
488 **Block: 292254701022004**
489 **Block: 292254701022005**
490 **Block: 292254701022006**
491 **Block: 292254701022007**
492 **Block: 292254701022008**
493 **Block: 292254701022009**
494 **Block: 292254701022010**
495 **Block: 292254701022011**
496 **Block: 292254701022012**
497 **Block: 292254701022013**
498 **Block: 292254701022014**
499 **Block: 292254701022015**
500 **Block: 292254701022019**
501 **Block: 292254701022020**
502 **Block: 292254701022021**
503 **Block: 292254701022022**
504 **Block: 292254701022023**
505 **Block: 292254701022024**
506 **Block: 292254701022025**
507 **Block: 292254701022026**
508 **Block: 292254701022027**
509 **Block: 292254701022028**
510 **Block: 292254701022029**
511 **Block: 292254701022030**
512 **Block: 292254701022031**
513 **Block: 292254701022032**
514 **Block: 292254701022033**
515 **Block: 292254701022034**
516 **Block: 292254701022035**

HCS HB 2909

113

517 **Block: 292254701022036**
518 **Block: 292254701022037**
519 **Block: 292254701022038**
520 **Block: 292254701022039**
521 **Block: 292254701022040**
522 **Block: 292254701022041**
523 **Block: 292254701022042**
524 **Block: 292254701022043**
525 **Block: 292254701022044**
526 **Block: 292254701022045**
527 **Block: 292254701022046**
528 **Block: 292254701022047**
529 **Block: 292254701022048**
530 **Block: 292254701022049**
531 **Block: 292254701022050**
532 **Block: 292254701022051**
533 **Block: 292254701022052**
534 **Block: 292254701022053**
535 **Block: 292254701022054**
536 **Block: 292254701022055**
537 **Block: 292254701022056**
538 **Block: 292254701022057**
539 **Block: 292254701022058**
540 **Block: 292254701022059**
541 **Block: 292254701022061**
542 **Block: 292254701023081**
543 **Block: 292254701023082**
544 **Block: 292254701023085**
545 **Block: 292254701023086**
546 **VTD: High Prairie**
547 **VTD: Jackson**
548 **VTD: Marshfield East**
549 **VTD: Marshfield West**
550 **VTD: Niangua**
551 **VTD: Northview A**
552 **VTD: Northview B**
553 **Block: 292254702022011**

HCS HB 2909

114

554 **Block: 292254702022012**
555 **Block: 292254702022013**
556 **Block: 292254702022016**
557 **Block: 292254702022019**
558 **Block: 292254702022020**
559 **Block: 292254702022021**
560 **Block: 292254702022022**
561 **Block: 292254702022023**
562 **Block: 292254702022024**
563 **Block: 292254702022025**
564 **Block: 292254702022037**
565 **Block: 292254702022038**
566 **Block: 292254702022039**
567 **Block: 292254702022040**
568 **Block: 292254703022009**
569 **Block: 292254703022011**
570 **Block: 292254703023000**
571 **Block: 292254703023001**
572 **Block: 292254703023002**
573 **Block: 292254703023003**
574 **Block: 292254703023004**
575 **Block: 292254703023005**
576 **Block: 292254703023006**
577 **Block: 292254703023014**
578 **Block: 292254703023015**
579 **Block: 292254703023016**
580 **Block: 292254703023017**
581 **Block: 292254703023018**
582 **Block: 292254703023019**
583 **Block: 292254703023020**
584 **Block: 292254703023021**
585 **Block: 292254703023022**
586 **Block: 292254703023023**
587 **Block: 292254703023024**
588 **Block: 292254703023025**
589 **Block: 292254703023026**
590 **Block: 292254703023027**

HCS HB 2909

115

591 **Block: 292254703023034**

592 **VTD: Union**

593 **VTD: Washington**

128.465. The fifth congressional district shall be composed of the following:

2 **County: Clay MO**

3 **VTD: Chou 8**

4 **Block: 290470206032000**

5 **Block: 290470206032001**

6 **Block: 290470206032002**

7 **Block: 290470206032003**

8 **Block: 290470206032004**

9 **Block: 290470206032007**

10 **Block: 290470206032008**

11 **Block: 290470206032014**

12 **Block: 290470206032015**

13 **Block: 290470206032016**

14 **Block: 290470206032017**

15 **Block: 290470206032018**

16 **Block: 290470206034000**

17 **Block: 290470206034001**

18 **Block: 290470206034002**

19 **Block: 290470206034003**

20 **Block: 290470206034004**

21 **Block: 290470206034005**

22 **Block: 290470206034006**

23 **Block: 290470206034007**

24 **Block: 290470206034008**

25 **Block: 290470206034018**

26 **Block: 290470206034019**

27 **Block: 290470206034020**

28 **Block: 290470208032005**

29 **Block: 290470208032006**

30 **Block: 290470208032007**

31 **Block: 290470208032008**

32 **Block: 290470208032009**

33 **Block: 290470208032010**

34 **Block: 290470208033012**

HCS HB 2909

116

35 **Block: 290470208033015**
36 **Block: 290470208033016**
37 **Block: 290470209021002**
38 **Block: 290470209021003**
39 **Block: 290470209021008**
40 **Block: 290470209021019**
41 **Block: 290470209021020**
42 **Block: 290470209021021**
43 **Block: 290470209021022**
44 **Block: 290470223023019**
45 **VTD: Gal 10**
46 **VTD: Gal 11**
47 **VTD: Gal 12**
48 **VTD: Gal 13**
49 **VTD: Gal 14**
50 **VTD: Gal 15**
51 **VTD: Gal 16**
52 **VTD: Gal 17**
53 **VTD: Gal 18**
54 **VTD: Gal 4**
55 **VTD: Gal 5**
56 **VTD: Gal 6**
57 **VTD: Gal 7**
58 **VTD: Gal 9**
59 **VTD: KC 21 Pl 1**
60 **Block: 290470213031000**
61 **Block: 290470213031001**
62 **Block: 290470213031002**
63 **Block: 290470213031003**
64 **Block: 290470213031004**
65 **Block: 290470213031005**
66 **Block: 290470213031006**
67 **Block: 290470213031007**
68 **Block: 290470213031008**
69 **Block: 290470213031009**
70 **Block: 290470213031010**
71 **Block: 290470213031011**

HCS HB 2909

117

72 **Block: 290470213031012**
73 **Block: 290470213031013**
74 **Block: 290470213031014**
75 **Block: 290470213031015**
76 **Block: 290470213031016**
77 **Block: 290470213031017**
78 **Block: 290470213031020**
79 **Block: 290470213031021**
80 **Block: 290470213111000**
81 **Block: 290470213111001**
82 **Block: 290470213111002**
83 **Block: 290470213111003**
84 **Block: 290470213111004**
85 **Block: 290470213111005**
86 **Block: 290470213111006**
87 **Block: 290470213111009**
88 **Block: 290470213141000**
89 **Block: 290470213141001**
90 **Block: 290470213141002**
91 **Block: 290470213141003**
92 **Block: 290470213141004**
93 **Block: 290470213141005**
94 **Block: 290470213141006**
95 **Block: 290470213141007**
96 **Block: 290470213141008**
97 **Block: 290470213141009**
98 **Block: 290470213141014**
99 **Block: 290470213141015**
100 **Block: 290470213141016**
101 **Block: 290470213141017**
102 **Block: 290470213141018**
103 **Block: 290470213141020**
104 **Block: 290470213141021**
105 **Block: 290470213141029**
106 **Block: 290470213142000**
107 **Block: 290470213142001**
108 **Block: 290470213142002**

HCS HB 2909

118

109 **Block: 290470213142003**
110 **Block: 290470213142004**
111 **Block: 290470213142005**
112 **Block: 290470213142006**
113 **Block: 290470213142007**
114 **Block: 290470213142008**
115 **Block: 290470213142009**
116 **Block: 290470213142010**
117 **Block: 290470213142011**
118 **Block: 290470213142012**
119 **Block: 290470213142013**
120 **Block: 290470213142017**
121 **Block: 290470213142018**
122 **Block: 290470213142019**
123 **Block: 290470213143000**
124 **Block: 290470213143001**
125 **Block: 290470213143002**
126 **Block: 290470213143003**
127 **Block: 290470213143004**
128 **Block: 290470213143005**
129 **Block: 290470213143006**
130 **Block: 290470213143007**
131 **Block: 290470213143008**
132 **Block: 290470213143009**
133 **Block: 290470213143010**
134 **Block: 290470213143011**
135 **Block: 290470213143012**
136 **Block: 290470213143013**
137 **Block: 290470213143014**
138 **Block: 290470213143015**
139 **Block: 290470213143016**
140 **Block: 290470213143017**
141 **Block: 290470213143018**
142 **Block: 290470213143019**
143 **Block: 290470213143020**
144 **Block: 290470213143021**
145 **Block: 290470213143022**

HCS HB 2909

119

146 **Block: 290470213143023**
147 **Block: 290470213143024**
148 **Block: 290470213143025**
149 **Block: 290470213143026**
150 **Block: 290470213143027**
151 **Block: 290470213143028**
152 **Block: 290470213143029**
153 **Block: 290470213143030**
154 **Block: 290470213143031**
155 **Block: 290470213143032**
156 **Block: 290470213143033**
157 **Block: 290470213143034**
158 **Block: 290470213143035**
159 **Block: 290470213143036**
160 **Block: 290470213143037**
161 **Block: 290470213144000**
162 **Block: 290470213144001**
163 **Block: 290470219003037**
164 **Block: 290470219003041**
165 **Block: 290470219003042**
166 **Block: 290470219003043**
167 **Block: 290470219003044**
168 **Block: 290470219003045**
169 **Block: 290470219003046**
170 **Block: 290470219003047**
171 **Block: 290470219003051**
172 **Block: 290470219003052**
173 **Block: 290470219003053**
174 **Block: 290470219003054**
175 **Block: 290470219003055**
176 **Block: 290470219003056**
177 **Block: 290470219003057**
178 **Block: 290470219003058**
179 **Block: 290470219003061**
180 **Block: 290470219003062**
181 **Block: 290470219004039**
182 **Block: 290470219004040**

HCS HB 2909

120

183 **Block: 290470219004042**
184 **Block: 290470219004043**
185 **Block: 290470219004044**
186 **Block: 290470219004048**
187 **Block: 290470219004049**
188 **Block: 290470219004050**
189 **Block: 290470219004051**
190 **Block: 290470219004052**
191 **Block: 290470219004053**
192 **Block: 290470219004054**
193 **Block: 290470219004055**
194 **Block: 290470219004059**
195 **Block: 290470219004064**
196 **Block: 290470219004065**
197 **VTD: KC 21-1**
198 **VTD: KC 21-10**
199 **VTD: KC 21-11**
200 **VTD: KC 21-12**
201 **VTD: KC 21-13**
202 **VTD: KC 21-14**
203 **VTD: KC 21-15**
204 **VTD: KC 21-16**
205 **VTD: KC 21-17**
206 **VTD: KC 21-18**
207 **VTD: KC 21-19**
208 **VTD: KC 21-2**
209 **VTD: KC 21-20**
210 **VTD: KC 21-21**
211 **VTD: KC 21-23**
212 **VTD: KC 21-24**
213 **VTD: KC 21-25**
214 **VTD: KC 21-26**
215 **VTD: KC 21-27**
216 **VTD: KC 21-3**
217 **VTD: KC 21-4**
218 **VTD: KC 21-5**
219 **VTD: KC 21-6**

HCS HB 2909

121

220 **VTD: KC 21-7**
221 **VTD: KC 21-8**
222 **VTD: KC 21-9**
223 **VTD: Lib 5**
224 **Block: 290470208031017**
225 **Block: 290470208032000**
226 **Block: 290470208032001**
227 **Block: 290470208032002**
228 **Block: 290470208032003**
229 **Block: 290470208032004**
230 **Block: 290470208033004**
231 **Block: 290470208033005**
232 **Block: 290470208033006**
233 **Block: 290470208033007**
234 **Block: 290470208033008**
235 **Block: 290470208033009**
236 **Block: 290470208033010**
237 **Block: 290470208033011**
238 **Block: 290470208033013**
239 **Block: 290470208033014**
240 **Block: 290470208033017**
241 **Block: 290470209021004**
242 **Block: 290470209021005**
243 **Block: 290470209021006**
244 **Block: 290470209021007**
245 **County: Jackson MO**
246 **VTD: 1603**
247 **VTD: 412**
248 **VTD: 413**
249 **VTD: 414**
250 **VTD: 415**
251 **VTD: 616**
252 **VTD: 617**
253 **VTD: 618**
254 **VTD: 619**
255 **VTD: Blue 01-01**
256 **VTD: Blue 01-02**

HCS HB 2909

122

257 **VTD: Blue 01-03**
258 **VTD: Blue 01-04**
259 **VTD: Blue 01-05**
260 **VTD: Blue 01-06**
261 **VTD: Blue 01-07**
262 **Block: 290950151001075**
263 **VTD: Blue 01-09**
264 **VTD: Blue 02-01**
265 **VTD: Blue 02-02**
266 **VTD: Blue 02-03**
267 **VTD: Blue 02-04**
268 **VTD: Blue 02-05**
269 **VTD: Blue 02-06**
270 **VTD: Blue 02-07**
271 **VTD: Blue 03-01**
272 **VTD: Blue 03-02**
273 **VTD: Blue 03-03**
274 **VTD: Blue 03-04**
275 **Block: 290950114064000**
276 **Block: 290950114064001**
277 **Block: 290950114064002**
278 **Block: 290950114064003**
279 **Block: 290950114064004**
280 **Block: 290950114064005**
281 **Block: 290950114064006**
282 **Block: 290950114064007**
283 **Block: 290950151002033**
284 **Block: 290950177002013**
285 **Block: 290950177004000**
286 **Block: 290950177004001**
287 **Block: 290950177004002**
288 **Block: 290950177004003**
289 **Block: 290950177004004**
290 **Block: 290950177004005**
291 **Block: 290950177004006**
292 **Block: 290950177004007**
293 **Block: 290950177004008**

HCS HB 2909

123

294 **Block: 290950177004009**
295 **Block: 290950177004010**
296 **Block: 290950177004011**
297 **Block: 290950177004012**
298 **Block: 290950177004013**
299 **Block: 290950177004014**
300 **Block: 290950177004015**
301 **Block: 290950177004016**
302 **VTD: Blue 03-05**
303 **VTD: Blue 04-01**
304 **VTD: Blue 04-02**
305 **VTD: Blue 04-03**
306 **VTD: Blue 04-04**
307 **VTD: Blue 04-05**
308 **VTD: Blue 04-06**
309 **VTD: Blue 04-07**
310 **VTD: Blue 04-08**
311 **VTD: Blue 04-09**
312 **VTD: Blue 04-10**
313 **VTD: Blue 05-01**
314 **VTD: Blue 05-02**
315 **VTD: Blue 05-03**
316 **VTD: Blue 05-04**
317 **VTD: Blue 05-05**
318 **VTD: Blue 05-06**
319 **VTD: Blue 05-07**
320 **VTD: Blue 05-08**
321 **VTD: Blue 05-09**
322 **VTD: Blue 06-01**
323 **VTD: Blue 06-02**
324 **VTD: Blue 06-03**
325 **VTD: Blue 06-04**
326 **VTD: Blue 06-05**
327 **VTD: Blue 06-06**
328 **VTD: Blue 06-07**
329 **VTD: Blue 07-01**
330 **VTD: Blue 07-02**

HCS HB 2909

124

331 **VTD: Blue 07-03**
332 **VTD: Blue 07-04**
333 **VTD: Blue 07-05**
334 **VTD: Blue 07-06**
335 **VTD: Blue 07-07**
336 **VTD: Blue 07-08**
337 **VTD: Blue 07-09**
338 **VTD: Blue 08-01**
339 **VTD: Blue 08-02**
340 **VTD: Blue 08-03**
341 **VTD: Blue 08-04**
342 **VTD: Blue 08-05**
343 **VTD: Blue 08-06**
344 **VTD: Blue 08-07**
345 **VTD: Blue 08-08**
346 **VTD: Brooking No. 1**
347 **VTD: Brooking No. 10**
348 **VTD: Brooking No. 11**
349 **VTD: Brooking No. 12**
350 **VTD: Brooking No. 13**
351 **VTD: Brooking No. 14**
352 **VTD: Brooking No. 15**
353 **VTD: Brooking No. 16**
354 **VTD: Brooking No. 17**
355 **VTD: Brooking No. 18**
356 **VTD: Brooking No. 19**
357 **VTD: Brooking No. 2**
358 **VTD: Brooking No. 20**
359 **VTD: Brooking No. 3**
360 **VTD: Brooking No. 4**
361 **VTD: Brooking No. 5**
362 **VTD: Brooking No. 6**
363 **VTD: Brooking No. 7**
364 **VTD: Brooking No. 8**
365 **VTD: Brooking No. 9**
366 **VTD: Fort Osage 01**
367 **Block: 290950177001027**

HCS HB 2909

125

368 **Block: 290950177001029**
369 **Block: 290950177001030**
370 **Block: 290950177001031**
371 **Block: 290950177001032**
372 **Block: 290950177001033**
373 **Block: 290950177001034**
374 **Block: 290950177001046**
375 **Block: 290950177001049**
376 **VTD: KC 1001**
377 **VTD: KC 1002**
378 **VTD: KC 1003**
379 **VTD: KC 1004**
380 **VTD: KC 1005**
381 **VTD: KC 1006**
382 **VTD: KC 1007**
383 **VTD: KC 1008**
384 **VTD: KC 1009**
385 **VTD: KC 101**
386 **VTD: KC 1010**
387 **VTD: KC 1011**
388 **VTD: KC 1012**
389 **VTD: KC 102**
390 **VTD: KC 103**
391 **VTD: KC 104**
392 **VTD: KC 105**
393 **VTD: KC 106**
394 **VTD: KC 107**
395 **VTD: KC 1101**
396 **VTD: KC 1102**
397 **VTD: KC 1103**
398 **VTD: KC 1104**
399 **VTD: KC 1105**
400 **VTD: KC 1106**
401 **VTD: KC 1107**
402 **VTD: KC 1108**
403 **VTD: KC 1109**
404 **VTD: KC 1110**

HCS HB 2909

126

405	VTD: KC 1111
406	VTD: KC 1112
407	VTD: KC 1113
408	VTD: KC 1114
409	VTD: KC 1201
410	VTD: KC 1202
411	VTD: KC 1203
412	VTD: KC 1204
413	VTD: KC 1205
414	VTD: KC 1206
415	VTD: KC 1207
416	VTD: KC 1208
417	VTD: KC 1209
418	VTD: KC 1210
419	VTD: KC 1211
420	VTD: KC 1212
421	VTD: KC 1301
422	VTD: KC 1303
423	VTD: KC 1304
424	VTD: KC 1305
425	VTD: KC 1306
426	VTD: KC 1307
427	VTD: KC 1308
428	VTD: KC 1309
429	VTD: KC 1310
430	VTD: KC 1311
431	VTD: KC 1312
432	VTD: KC 1313
433	VTD: KC 1401
434	VTD: KC 1402
435	VTD: KC 1403
436	VTD: KC 1404
437	VTD: KC 1405
438	VTD: KC 1406
439	VTD: KC 1407
440	VTD: KC 1408
441	VTD: KC 1409

HCS HB 2909

127

442 **VTD: KC 1410**
443 **VTD: KC 1411**
444 **VTD: KC 1412**
445 **VTD: KC 1413**
446 **VTD: KC 1414**
447 **VTD: KC 1415**
448 **VTD: KC 1501**
449 **VTD: KC 1502**
450 **VTD: KC 1503**
451 **VTD: KC 1504**
452 **VTD: KC 1505**
453 **VTD: KC 1506**
454 **VTD: KC 1507**
455 **VTD: KC 1508**
456 **VTD: KC 1509**
457 **VTD: KC 1510**
458 **VTD: KC 1511**
459 **VTD: KC 1512**
460 **VTD: KC 1513**
461 **VTD: KC 1514**
462 **VTD: KC 1515**
463 **VTD: KC 1516**
464 **VTD: KC 1517**
465 **VTD: KC 1518**
466 **VTD: KC 1519**
467 **VTD: KC 1520**
468 **VTD: KC 1521**
469 **VTD: KC 1522**
470 **VTD: KC 1523**
471 **VTD: KC 1524**
472 **VTD: KC 1601**
473 **VTD: KC 1602**
474 **VTD: KC 1604**
475 **VTD: KC 1605**
476 **VTD: KC 1606**
477 **VTD: KC 1607**
478 **VTD: KC 1608**

HCS HB 2909

128

479	VTD: KC 1609
480	VTD: KC 1610
481	VTD: KC 1611
482	VTD: KC 1612
483	VTD: KC 1613
484	VTD: KC 1614
485	VTD: KC 1615
486	VTD: KC 1701
487	VTD: KC 1702
488	VTD: KC 1703
489	VTD: KC 1704
490	VTD: KC 1705
491	VTD: KC 1706
492	VTD: KC 1707
493	VTD: KC 1708
494	VTD: KC 1709
495	VTD: KC 1710
496	VTD: KC 1711
497	VTD: KC 1712
498	VTD: KC 1713
499	VTD: KC 1714
500	VTD: KC 1801
501	VTD: KC 1802
502	VTD: KC 1803
503	VTD: KC 1804
504	VTD: KC 1805
505	VTD: KC 1806
506	VTD: KC 1807
507	VTD: KC 1808
508	VTD: KC 1809
509	VTD: KC 1810
510	VTD: KC 1811
511	VTD: KC 1812
512	VTD: KC 1813
513	VTD: KC 1814
514	VTD: KC 1815
515	VTD: KC 1816

HCS HB 2909

129

516 VTD: KC 1901
517 VTD: KC 1902
518 VTD: KC 1903
519 VTD: KC 1904
520 VTD: KC 1905
521 VTD: KC 1906
522 VTD: KC 1907
523 VTD: KC 1908
524 VTD: KC 1909
525 VTD: KC 1910
526 VTD: KC 1911
527 VTD: KC 1912
528 VTD: KC 1913
529 VTD: KC 1914
530 VTD: KC 1915
531 VTD: KC 1916
532 VTD: KC 1917
533 VTD: KC 1918
534 VTD: KC 1919
535 VTD: KC 1920
536 VTD: KC 1921
537 VTD: KC 1922
538 VTD: KC 1923
539 VTD: KC 2001
540 VTD: KC 2002
541 VTD: KC 2003
542 VTD: KC 2004
543 VTD: KC 2005
544 VTD: KC 2006
545 VTD: KC 2007
546 VTD: KC 2008
547 VTD: KC 2009
548 VTD: KC 201
549 VTD: KC 2010
550 VTD: KC 202
551 VTD: KC 203
552 VTD: KC 204

HCS HB 2909

130

553 **VTD: KC 207**
554 **VTD: KC 208**
555 **VTD: KC 209**
556 **VTD: KC 210**
557 **VTD: KC 212**
558 **VTD: KC 213**
559 **VTD: KC 214**
560 **VTD: KC 215**
561 **VTD: KC 216**
562 **VTD: KC 217**
563 **VTD: KC 218**
564 **VTD: KC 2201**
565 **VTD: KC 2202**
566 **VTD: KC 2203**
567 **VTD: KC 2204**
568 **VTD: KC 2205**
569 **VTD: KC 2206**
570 **VTD: KC 2207**
571 **VTD: KC 2208**
572 **VTD: KC 2209**
573 **VTD: KC 2210**
574 **VTD: KC 2211**
575 **VTD: KC 2212**
576 **VTD: KC 2213**
577 **VTD: KC 2301**
578 **VTD: KC 2302**
579 **VTD: KC 2303**
580 **VTD: KC 2304**
581 **VTD: KC 2305**
582 **VTD: KC 2306**
583 **VTD: KC 2307**
584 **VTD: KC 2308**
585 **VTD: KC 2309**
586 **VTD: KC 2310**
587 **VTD: KC 2311**
588 **VTD: KC 2312**
589 **VTD: KC 2313**

HCS HB 2909

131

590 **VTD: KC 2314**
591 **VTD: KC 2315**
592 **VTD: KC 2316**
593 **VTD: KC 2401**
594 **VTD: KC 2402**
595 **VTD: KC 2403**
596 **VTD: KC 2404**
597 **VTD: KC 2405**
598 **VTD: KC 2406**
599 **VTD: KC 2407**
600 **VTD: KC 2408**
601 **VTD: KC 2409**
602 **VTD: KC 2410**
603 **VTD: KC 2411**
604 **VTD: KC 2412**
605 **VTD: KC 2413**
606 **VTD: KC 2414**
607 **VTD: KC 2415**
608 **VTD: KC 2416**
609 **VTD: KC 2417**
610 **VTD: KC 2418**
611 **VTD: KC 2419**
612 **VTD: KC 2420**
613 **VTD: KC 2421**
614 **VTD: KC 2422**
615 **VTD: KC 2423**
616 **VTD: KC 2424**
617 **VTD: KC 2425**
618 **VTD: KC 2426**
619 **VTD: KC 2427**
620 **VTD: KC 2428**
621 **VTD: KC 2429**
622 **VTD: KC 2430**
623 **VTD: KC 2431**
624 **VTD: KC 2501**
625 **VTD: KC 2502**
626 **VTD: KC 2503**

HCS HB 2909

132

627 **VTD: KC 2504**
628 **VTD: KC 2505**
629 **VTD: KC 2506**
630 **VTD: KC 2507**
631 **VTD: KC 2508**
632 **VTD: KC 2509**
633 **VTD: KC 2510**
634 **VTD: KC 2511**
635 **VTD: KC 2512**
636 **VTD: KC 2513**
637 **VTD: KC 2514**
638 **VTD: KC 2601**
639 **VTD: KC 2602**
640 **VTD: KC 2603**
641 **VTD: KC 2604**
642 **VTD: KC 2605**
643 **VTD: KC 2606**
644 **VTD: KC 2607**
645 **VTD: KC 2608**
646 **VTD: KC 2609**
647 **VTD: KC 2610**
648 **VTD: KC 2611**
649 **VTD: KC 2612**
650 **VTD: KC 2613**
651 **VTD: KC 301**
652 **VTD: KC 302**
653 **VTD: KC 303**
654 **VTD: KC 304**
655 **VTD: KC 305**
656 **VTD: KC 306**
657 **VTD: KC 307**
658 **VTD: KC 308**
659 **VTD: KC 309**
660 **VTD: KC 310**
661 **VTD: KC 311**
662 **VTD: KC 312**
663 **VTD: KC 313**

HCS HB 2909

133

664	VTD: KC 314
665	VTD: KC 315
666	VTD: KC 316
667	VTD: KC 317
668	VTD: KC 318
669	VTD: KC 401
670	VTD: KC 402
671	VTD: KC 403
672	VTD: KC 404
673	VTD: KC 405
674	VTD: KC 406
675	VTD: KC 407
676	VTD: KC 408
677	VTD: KC 409
678	VTD: KC 410
679	VTD: KC 411
680	VTD: KC 501
681	VTD: KC 502
682	VTD: KC 503
683	VTD: KC 504
684	VTD: KC 505
685	VTD: KC 506
686	VTD: KC 507
687	VTD: KC 508
688	VTD: KC 509
689	VTD: KC 510
690	VTD: KC 511
691	VTD: KC 512
692	VTD: KC 513
693	VTD: KC 601
694	VTD: KC 602
695	VTD: KC 603
696	VTD: KC 604
697	VTD: KC 605
698	VTD: KC 606
699	VTD: KC 607
700	VTD: KC 608

HCS HB 2909

134

701 **VTD: KC 609**
702 **VTD: KC 610**
703 **VTD: KC 611**
704 **VTD: KC 612**
705 **VTD: KC 613**
706 **VTD: KC 614**
707 **VTD: KC 615**
708 **VTD: KC 701**
709 **VTD: KC 702**
710 **VTD: KC 703**
711 **VTD: KC 704**
712 **VTD: KC 705**
713 **VTD: KC 706**
714 **VTD: KC 707**
715 **VTD: KC 708**
716 **VTD: KC 709**
717 **VTD: KC 710**
718 **VTD: KC 711**
719 **VTD: KC 712**
720 **VTD: KC 713**
721 **VTD: KC 714**
722 **VTD: KC 715**
723 **VTD: KC 716**
724 **VTD: KC 717**
725 **VTD: KC 718**
726 **VTD: KC 801**
727 **VTD: KC 802**
728 **VTD: KC 803**
729 **VTD: KC 804**
730 **VTD: KC 805**
731 **VTD: KC 806**
732 **VTD: KC 807**
733 **VTD: KC 808**
734 **VTD: KC 809**
735 **VTD: KC 811**
736 **VTD: KC 812**
737 **VTD: KC 813**

HCS HB 2909

135

738 **VTD: KC 814**
739 **VTD: KC 815**
740 **VTD: KC 901**
741 **VTD: KC 902**
742 **VTD: KC 903**
743 **VTD: KC 904**
744 **VTD: KC 905**
745 **VTD: KC 906**
746 **VTD: KC 907**
747 **VTD: KC 908**
748 **VTD: KC 909**
749 **VTD: KC 910**
750 **VTD: KC 911**
751 **VTD: KC 913**
752 **VTD: KC WD13 PCT1302**
753 **VTD: KC WD2 PCT205**
754 **VTD: KC WD2 PCT206**
755 **VTD: KC WD2 PCT211**
756 **VTD: KC WD8 PCT810**
757 **VTD: KC1314**
758 **VTD: Prairie 03**
759 **VTD: Prairie 04**
760 **VTD: Prairie 05**
761 **VTD: Prairie 06**
762 **VTD: Prairie 07**
763 **VTD: Prairie 08**
764 **VTD: Prairie 09**
765 **VTD: Prairie 11**
766 **VTD: Prairie 12**
767 **VTD: Prairie 13**
768 **VTD: Prairie 14**
769 **VTD: Prairie 15**
770 **VTD: Prairie 16**
771 **VTD: Prairie 17**
772 **VTD: Prairie 18**
773 **VTD: Prairie 19**
774 **VTD: Prairie 20**

HCS HB 2909

136

775 **VTD: Prairie 21**
776 **VTD: Prairie 22**
777 **VTD: Prairie 23**
778 **VTD: Prairie 24**
779 **VTD: Prairie 26**
780 **VTD: Prairie 27**
781 **VTD: Prairie 28**
782 **VTD: Prairie 29**
783 **VTD: Prairie 30**
784 **VTD: Prairie 31**
785 **VTD: Prairie 32**
786 **VTD: Prairie 33**
787 **VTD: Prairie 34**
788 **VTD: Prairie 35**
789 **VTD: Prairie 36**
790 **VTD: Prairie 37**
791 **VTD: Prairie 38**
792 **VTD: Prairie 39**
793 **VTD: Prairie 40**
794 **VTD: Prairie 41**
795 **VTD: Prairie 42**
796 **VTD: Prairie 43**
797 **VTD: Prairie 44**
798 **VTD: Prairie 45**
799 **VTD: Prairie 46**
800 **VTD: Prairie 47**
801 **VTD: Prairie 48**
802 **VTD: Prairie 49**
803 **VTD: Prairie 50**
804 **VTD: Prairie 51**
805 **VTD: Prairie 59**
806 **VTD: Prairie 60**
807 **VTD: Prairie 62**
808 **VTD: Prairie 01**
809 **VTD: Prairie 02**
810 **VTD: Prairie 10**
811 **VTD: Prairie 25**

HCS HB 2909

137

812 **VTD: Prarie 53**
813 **VTD: Prarie 54**
814 **VTD: Prarie 55**
815 **VTD: Prarie 57**
816 **VTD: Sni-A-Bar 01**
817 **VTD: Sni-A-Bar 02**
818 **VTD: Sni-A-Bar 03**
819 **VTD: Sni-A-Bar 04**
820 **VTD: Sni-A-Bar 08**
821 **Block: 290950148063010**
822 **VTD: Sni-A-Bar 17**
823 **VTD: Sni-A-Bar 18**
824 **VTD: Sni-A-Bar 19**
825 **VTD: Sni-A-Bar 21**
826 **Block: 290950141231000**
827 **Block: 290950141231001**
828 **Block: 290950141231002**
829 **Block: 290950141231003**
830 **Block: 290950141231004**
831 **Block: 290950141231005**
832 **Block: 290950141231008**
833 **Block: 290950141231009**
834 **Block: 290950141241000**
835 **Block: 290950141241001**
836 **Block: 290950141241002**
837 **Block: 290950141241003**
838 **Block: 290950141241004**
839 **Block: 290950141241005**
840 **Block: 290950141241006**
841 **Block: 290950141241008**
842 **Block: 290950141241009**
843 **Block: 290950141241010**
844 **Block: 290950141241011**
845 **Block: 290950141241012**
846 **Block: 290950141241013**
847 **Block: 290950141241014**
848 **Block: 290950141241015**

HCS HB 2909

138

849 **Block: 290950141241026**
850 **Block: 290950141272001**
851 **Block: 290950141272002**
852 **Block: 290950141272003**
853 **Block: 290950141272004**
854 **Block: 290950141272006**
855 **Block: 290950141272007**
856 **Block: 290950141272008**
857 **Block: 290950141272009**
858 **Block: 290950141272010**
859 **Block: 290950141272023**
860 **Block: 290950141272024**
861 **Block: 290950193022052**
862 **Block: 290950193022053**
863 **VTD: Sni-A-Bar 22**
864 **VTD: Sni-A-Bar 24**
865 **VTD: Sni-A-Bar 25**
866 **VTD: Sni-A-Bar 26**
867 **VTD: Sni-A-Bar 27**
868 **VTD: Sni-A-Bar 28**
869 **VTD: Sni-A-Bar 34**
870 **VTD: Sni-A-Bar 35**
871 **VTD: Sni-A-Bar 36**
872 **VTD: Van Buren 04**
873 **Block: 290950139182015**
874 **VTD: Van Buren 06**
875 **VTD: Washington 01**
876 **VTD: Washington 02**
877 **VTD: Washington 03**
878 **VTD: Washington 04**
879 **VTD: Washington 05**
880 **VTD: Washington 06**
881 **VTD: Washington 07**
882 **VTD: Washington 08**
883 **VTD: Washington 09**
884 **VTD: Washington 10**
885 **VTD: Washington 11**

HCS HB 2909

139

886 **VTD: Washington 12**
 128.466. The sixth congressional district shall be composed of the following:

2 **County: Adair MO**
3 **County: Andrew MO**
4 **County: Atchison MO**
5 **County: Audrain MO**
6 **County: Buchanan MO**
7 **County: Caldwell MO**
8 **County: Carroll MO**
9 **County: Chariton MO**
10 **County: Clark MO**
11 **County: Clay MO**
12 **VTD: Chou 8**
13 **Block: 290470223023015**
14 **Block: 290470223023016**
15 **Block: 290470223023017**
16 **Block: 290470223023023**
17 **VTD: FR 1**
18 **VTD: FR 2**
19 **VTD: FR 3**
20 **VTD: FR 4**
21 **VTD: FR 5**
22 **VTD: KC 21 Lib 1**
23 **VTD: KC 21 Lib 2**
24 **VTD: KC 21 Lib 3**
25 **VTD: KC 21 Lib 4**
26 **VTD: KC 21 Lib 5**
27 **VTD: KC 21 Lib 6**
28 **VTD: KC 21 Pl 1**
29 **Block: 290470219003038**
30 **Block: 290470219003039**
31 **VTD: KC 21-22**
32 **VTD: Kry 1**
33 **VTD: Kry 2**
34 **VTD: Kry 3**
35 **VTD: Kry 4**
36 **VTD: Lib 1**

HCS HB 2909

140

37 **VTD: Lib 10**
38 **VTD: Lib 11**
39 **VTD: Lib 12**
40 **VTD: Lib 13**
41 **VTD: Lib 14**
42 **VTD: Lib 2**
43 **VTD: Lib 3**
44 **VTD: Lib 4**
45 **VTD: Lib 5**
46 **Block: 290470208021011**
47 **Block: 290470208021012**
48 **Block: 290470208021013**
49 **Block: 290470208021031**
50 **Block: 290470208021032**
51 **Block: 290470208021033**
52 **Block: 290470208021035**
53 **Block: 290470208021036**
54 **Block: 290470208021037**
55 **Block: 290470208021041**
56 **Block: 290470208021043**
57 **Block: 290470208021044**
58 **Block: 290470208021045**
59 **Block: 290470208021046**
60 **Block: 290470208021047**
61 **Block: 290470208021048**
62 **Block: 290470208021049**
63 **Block: 290470208021050**
64 **Block: 290470208021052**
65 **Block: 290470208021053**
66 **Block: 290470208021054**
67 **Block: 290470208031000**
68 **Block: 290470208031001**
69 **Block: 290470208031002**
70 **Block: 290470208031003**
71 **Block: 290470208031004**
72 **Block: 290470208031005**
73 **Block: 290470208031006**

HCS HB 2909

141

74 **Block: 290470208031007**
75 **Block: 290470208031008**
76 **Block: 290470208031009**
77 **Block: 290470208031010**
78 **Block: 290470208031011**
79 **Block: 290470208031012**
80 **Block: 290470208031013**
81 **Block: 290470208031014**
82 **Block: 290470208031015**
83 **Block: 290470208031016**
84 **Block: 290470208033000**
85 **Block: 290470208033001**
86 **Block: 290470208033002**
87 **Block: 290470208033003**
88 **Block: 290470223023010**
89 **Block: 290470223023011**
90 **Block: 290470223023018**
91 **VTD: Lib 6**
92 **VTD: Lib 7**
93 **VTD: Lib 8**
94 **VTD: Lib 9**
95 **VTD: Pl 1**
96 **VTD: Pl 2**
97 **VTD: Pl 3**
98 **VTD: Wash 1**
99 **VTD: Wash 2**
100 **VTD: Wash 3**
101 **County: Clinton MO**
102 **County: Daviess MO**
103 **County: DeKalb MO**
104 **County: Gentry MO**
105 **County: Grundy MO**
106 **County: Harrison MO**
107 **County: Holt MO**
108 **County: Jackson MO**
109 **VTD: Blue 01-07**
110 **Block: 290950151001008**

HCS HB 2909

142

111 **Block: 290950151001009**
112 **Block: 290950151001010**
113 **Block: 290950151001020**
114 **Block: 290950151001030**
115 **Block: 290950151001031**
116 **Block: 290950151001032**
117 **Block: 290950151001033**
118 **Block: 290950151001034**
119 **Block: 290950151001035**
120 **Block: 290950151001036**
121 **Block: 290950151001037**
122 **Block: 290950151001044**
123 **Block: 290950151001045**
124 **Block: 290950151001046**
125 **Block: 290950151001047**
126 **Block: 290950151001070**
127 **Block: 290950151001071**
128 **Block: 290950151001072**
129 **Block: 290950151001073**
130 **Block: 290950151001074**
131 **Block: 290950151001076**
132 **Block: 290950151001078**
133 **Block: 290950151001079**
134 **Block: 290950151001080**
135 **Block: 290950151001091**
136 **Block: 290950151001096**
137 **Block: 290950151001097**
138 **Block: 290950151001100**
139 **VTD: Blue 01-08**
140 **VTD: Blue 03-04**
141 **Block: 290950151002029**
142 **VTD: Blue 03-06**
143 **VTD: Blue 03-07**
144 **VTD: Blue 03-08**
145 **VTD: Blue 03-09**
146 **VTD: Fort Osage 01**
147 **Block: 290950177001028**

HCS HB 2909

143

148 **VTD: Fort Osage 02**
149 **VTD: Fort Osage 03**
150 **VTD: Fort Osage 04**
151 **VTD: Fort Osage 05**
152 **VTD: Fort Osage 06**
153 **VTD: Fort Osage 07**
154 **VTD: Fort Osage 08**
155 **VTD: Fort Osage 09**
156 **VTD: Fort Osage 10**
157 **VTD: Sni-A-Bar 06**
158 **VTD: Sni-A-Bar 50**
159 **Block: 290950149031030**
160 **Block: 290950149031063**
161 **Block: 290950149031065**
162 **Block: 290950149033000**
163 **Block: 290950149033021**
164 **County: Knox MO**
165 **County: Lewis MO**
166 **County: Lincoln MO**
167 **County: Linn MO**
168 **County: Livingston MO**
169 **County: Macon MO**
170 **County: Marion MO**
171 **County: Mercer MO**
172 **County: Monroe MO**
173 **County: Nodaway MO**
174 **County: Pike MO**
175 **County: Platte MO**
176 **County: Putnam MO**
177 **County: Ralls MO**
178 **County: Randolph MO**
179 **County: Ray MO**
180 **County: Schuyler MO**
181 **County: Scotland MO**
182 **County: Shelby MO**
183 **County: Sullivan MO**
184 **County: Worth MO**

HCS HB 2909

144

128.467. The seventh congressional district shall be composed of the following:

2 **County: Barry MO**
3 **County: Christian MO**
4 **County: Greene MO**
5 **County: Jasper MO**
6 **County: Lawrence MO**
7 **County: McDonald MO**
8 **County: Newton MO**
9 **County: Stone MO**
10 **County: Taney MO**
11 **County: Webster MO**
12 **VTD: Benton**
13 **VTD: Diggins**
14 **VTD: Finley**
15 **VTD: Fordland**
16 **VTD: Grant**
17 **Block: 292254701022060**
18 **Block: 292254701022062**
19 **VTD: Hazelwood**
20 **VTD: Northview B**
21 **Block: 292254703022008**
22 **Block: 292254703022012**
23 **Block: 292254703022013**
24 **Block: 292254703022014**
25 **Block: 292254703022030**
26 **Block: 292254703022031**
27 **Block: 292254703022032**
28 **Block: 292254703022033**
29 **Block: 292254703022034**
30 **Block: 292254703022035**
31 **Block: 292254703023007**
32 **Block: 292254703023008**
33 **Block: 292254703023009**
34 **Block: 292254703023010**
35 **Block: 292254703023011**
36 **Block: 292254703023012**
37 **Block: 292254703023013**

HCS HB 2909

145

38 **Block: 292254703023028**
39 **Block: 292254703023029**
40 **Block: 292254703023030**
41 **Block: 292254703023031**
42 **Block: 292254703023032**
43 **Block: 292254703023035**
44 **Block: 292254703023036**
45 **Block: 292254703023037**
46 **Block: 292254703023038**
47 **Block: 292254703023039**
48 **Block: 292254703023040**
49 **Block: 292254703023041**
50 **Block: 292254703023042**
51 **Block: 292254703023046**
52 **Block: 292254703023047**
53 **Block: 292254703023048**
54 **Block: 292254703023049**
55 **Block: 292254703023050**
56 **Block: 292254703023051**
57 **Block: 292254703023052**
58 **Block: 292254703023053**
59 **Block: 292254703023054**
60 **Block: 292254703023055**
61 **Block: 292254703023062**
62 **Block: 292254703023063**
63 **Block: 292254703023069**
64 **Block: 292254703023074**
65 **Block: 292254703023079**

128.468. The eighth congressional district shall be composed of the following:

2 **County: Bollinger MO**
3 **County: Butler MO**
4 **County: Cape Girardeau MO**
5 **County: Carter MO**
6 **County: Dent MO**
7 **County: Douglas MO**
8 **County: Dunklin MO**
9 **County: Howell MO**

HCS HB 2909

146

10 **County: Iron MO**
11 **County: Jefferson MO**
12 **VTD: Airport**
13 **VTD: American Legion**
14 **VTD: Antonia**
15 **VTD: Arnold W-1**
16 **VTD: Arnold W-2**
17 **VTD: Arnold W-3**
18 **VTD: Arnold W-4**
19 **VTD: Athena**
20 **VTD: Barnhart**
21 **VTD: Brennan**
22 **Block: 290997002101000**
23 **Block: 290997002101015**
24 **Block: 290997002111000**
25 **Block: 290997002111001**
26 **Block: 290997002111002**
27 **Block: 290997002111005**
28 **Block: 290997002111006**
29 **Block: 290997002111007**
30 **Block: 290997002111008**
31 **Block: 290997002111010**
32 **Block: 290997002111011**
33 **Block: 290997003031000**
34 **Block: 290997003031001**
35 **Block: 290997003031002**
36 **Block: 290997003031003**
37 **Block: 290997003031004**
38 **Block: 290997003031005**
39 **Block: 290997003031006**
40 **Block: 290997003031007**
41 **Block: 290997003031008**
42 **Block: 290997003031009**
43 **Block: 290997003031010**
44 **Block: 290997003031011**
45 **Block: 290997003031012**
46 **Block: 290997003031013**

HCS HB 2909

147

47 **Block: 290997003031014**
48 **Block: 290997003031015**
49 **Block: 290997003031016**
50 **Block: 290997003032000**
51 **Block: 290997003032001**
52 **Block: 290997003032002**
53 **Block: 290997003032003**
54 **Block: 290997003032004**
55 **Block: 290997003032005**
56 **Block: 290997003032006**
57 **Block: 290997003032007**
58 **Block: 290997003032008**
59 **Block: 290997003032009**
60 **Block: 290997003032010**
61 **Block: 290997003032011**
62 **Block: 290997003032012**
63 **Block: 290997003032013**
64 **Block: 290997003032014**
65 **Block: 290997003032015**
66 **Block: 290997003033000**
67 **Block: 290997003033001**
68 **Block: 290997003033002**
69 **Block: 290997003033003**
70 **Block: 290997003033004**
71 **Block: 290997003033005**
72 **Block: 290997003033006**
73 **Block: 290997003033007**
74 **Block: 290997003033008**
75 **Block: 290997003033009**
76 **Block: 290997003033010**
77 **Block: 290997003033011**
78 **Block: 290997003033012**
79 **Block: 290997003033013**
80 **Block: 290997003033014**
81 **Block: 290997003033015**
82 **Block: 290997003033016**
83 **Block: 290997003033017**

HCS HB 2909

148

84 **Block: 290997003033018**
85 **Block: 290997003033019**
86 **Block: 290997003051000**
87 **Block: 290997003052000**
88 **Block: 290997003052026**
89 **VTD: Crystal City W-1**
90 **VTD: Crystal City W-2**
91 **VTD: Crystal City W-3**
92 **VTD: Crystal City W-4**
93 **VTD: Festus Outside**
94 **VTD: Festus W-1**
95 **VTD: Festus W-2**
96 **VTD: Festus W-3**
97 **VTD: Festus W-4**
98 **VTD: Flamm City**
99 **VTD: Hematite**
100 **VTD: Herculaneum**
101 **VTD: Herculaneum W-2**
102 **VTD: Herculaneum W-3**
103 **VTD: Imperial**
104 **VTD: Imperial 2**
105 **VTD: Jefferson Heights**
106 **VTD: Jefferson R7**
107 **VTD: Kimmswick W-1**
108 **VTD: Lonedell**
109 **VTD: Mapaville**
110 **VTD: Marble Springs**
111 **VTD: Mastodon**
112 **VTD: Maxville**
113 **VTD: Meramec Heights**
114 **VTD: Miller**
115 **VTD: Murphy**
116 **VTD: North Jefferson**
117 **Block: 290997002112008**
118 **Block: 290997002112009**
119 **Block: 290997002112010**
120 **Block: 290997002112011**

HCS HB 2909

149

121 **Block: 290997002112012**
122 **Block: 290997002112013**
123 **Block: 290997002112014**
124 **Block: 290997002112015**
125 **Block: 290997002112016**
126 **VTD: Oakvale**
127 **VTD: Olympian Village**
128 **VTD: Otto**
129 **VTD: Pevely W-1**
130 **VTD: Pevely W-2**
131 **VTD: Pevely W-3**
132 **VTD: Pevely W-4**
133 **VTD: Plattin**
134 **VTD: Riverview**
135 **VTD: Rock Creek**
136 **VTD: Rock Creek 1**
137 **VTD: Romaine Creek**
138 **VTD: Saline**
139 **VTD: Springdale**
140 **VTD: Sunrise**
141 **VTD: Valle**
142 **Block: 290997013002004**
143 **Block: 290997013002005**
144 **Block: 290997013002006**
145 **Block: 290997013003000**
146 **Block: 290997013003001**
147 **Block: 290997013003002**
148 **Block: 290997013003012**
149 **Block: 290997013003026**
150 **Block: 290997014012007**
151 **Block: 290997014012012**
152 **VTD: Victoria**
153 **Block: 290997010021006**
154 **Block: 290997010021008**
155 **Block: 290997010021019**
156 **Block: 290997010021021**
157 **Block: 290997010023004**

HCS HB 2909

150

158 **Block: 290997010023005**
 159 **Block: 290997010023006**
 160 **Block: 290997010023012**
 161 **Block: 290997010023013**
 162 **Block: 290997010023029**
 163 **Block: 290997010023030**
 164 **Block: 290997010023035**
 165 **VTD: Windsor**
 166 **County: Madison MO**
 167 **County: Mississippi MO**
 168 **County: New Madrid MO**
 169 **County: Oregon MO**
 170 **County: Ozark MO**
 171 **County: Pemiscot MO**
 172 **County: Perry MO**
 173 **County: Phelps MO**
 174 **County: Reynolds MO**
 175 **County: Ripley MO**
 176 **County: Scott MO**
 177 **County: Shannon MO**
 178 **County: St. Francois MO**
 179 **County: Ste. Genevieve MO**
 180 **County: Stoddard MO**
 181 **County: Texas MO**
 182 **County: Wayne MO**
 183 **County: Wright MO**

2 **128.469. Upon passage and enactment of sections 128.461 to 128.468 and as**
 3 **provided to the Revisor of Statutes, the revisor of statutes shall publish the graphical**
 4 **map representation of the official congressional district boundaries as an appendix of**
 5 **the Revised Statutes of Missouri.**

2 Section B. Because immediate action is necessary to comply with the constitutional
 3 requirement, under Article III, Section 45 of the Constitution of Missouri, to draw
 4 congressional districts for the election of representatives to the 118th Congress of the United
 5 States to which the state of Missouri is entitled, the repeal and reenactment of sections
 6 128.345, 128.346, and 128.348 and the enactment of sections 128.461, 128.462, 128.463,
 7 128.464, 128.465, 128.466, 128.467, 128.468, and 128.469 of Section A of this act is deemed
 8 necessary for the immediate preservation of the public health, welfare, peace, and safety, and

SC101805 Appeal Document Number 42 Page 152

HCS HB 2909

151

8 is hereby declared to be an emergency act within the meaning of the constitution, and the
9 repeal and reenactment of sections 128.345, 128.346, and 128.348 and the enactment of
10 sections 128.461, 128.462, 128.463, 128.464, 128.465, 128.466, 128.467, 128.468, and
11 128.469 of Section A of this act shall be in full force and effect upon its passage and approval.

✓

Stipulated Exhibit 21

AFFIDAVIT OF BRIANNA LENNON

Affiant first being duly sworn on her oath attests:

1. My name is Brianna Lennon, and I am the County Clerk and Election Authority for Boone County, Missouri, having been sworn into office on January 1, 2019.

2. Prior to my position in the Boone County Clerk's Office, I served as elections counsel and coordinator of the Election Integrity Unit in the Missouri Secretary of State's Office from January 2013 through December 2015.

3. During my seven years as the election authority for Boone County, I have personally implemented new congressional district boundaries in the statewide voter registration database (MCVR) twice: once in 2022 during the decennial census redistricting and again in 2026 after passage of House Bill 1 (2025).

4. The process for implementing congressional districts in MCVR is accomplished by manually assigning congressional districts to each precinct in a county. Each precinct is comprised of address ranges so that when a voter registers to vote at a particular address, they are tied to the appropriate precinct, which in turn ties them to the appropriate congressional district.

5. On August 27, 2025, I, and the Missouri Association of County Clerks and Election Authorities, communicated our concerns about redistricting timing to the Missouri Secretary of State's Office, explaining that redistricting is a lengthy manual process in MCVR and that, because MCVR "locks" district boundaries during any active election, new districts cannot be created (and voters subsequently cannot be assigned to new districts) while a county administers an election.

6. For all state and federal districts in Missouri, it is the responsibility of the Missouri Secretary of State's Office to create a new district in MCVR. The district does not have any precincts or addresses tied to it when it is created by the state because it is the responsibility of the

local election authorities to tie the appropriate precincts to the new districts.

7. After House Bill 1 was signed into law in September 2025, I expected that the Missouri Secretary of State's Office would create a district for the new Congressional map shortly after passage. However, only the 2022 districts existed in MCVR until May 15, 2026.

8. On January 9, 2026, I received raw data of the new Congressional district boundaries from the Missouri Secretary of State that could only be read by specific geographic information system (GIS) software.

9. I provided the data to Boone County's GIS department so that I could begin the preliminary manual work of assigning addresses and precincts to the new Congressional districts. This work was performed in Microsoft Excel because MCVR did not have 2025 Congressional districts at that time.

10. On May 15, 2026, I received an email from the Missouri Secretary of State notifying the counties that his office had created the 2025 Congressional districts in MCVR and that counties could begin tying precincts to the new districts.

11. I completed the process of tying voters to their 2025 Congressional districts during the week of May 18, 2026.

12. Once a district exists in MCVR and voters are tied to it, counties can simply select which districts are included in an election to administratively set up the election and create ballots with the appropriate districts.

13. Because the new districts were created by the Missouri Secretary of State's Office in May, which was early enough to comply with statutory election deadlines, Boone County and all other counties in the state were able to select the 2025 Congressional district in MCVR and administer the August 4, 2026 Primary Election using the new maps.

14. Now, every voter in Boone County – and statewide – is tied to both their 2022 Congressional district and their 2025 Congressional district. This is confirmed in both MCVR and the state's voter registration lookup tool, which displays both 2022 and 2025 district assignments.

15. The 2022 Congressional districts were used successfully in the November 2024 General Election and have not been overwritten in MCVR.

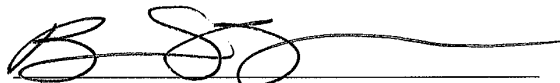
16. The 2022 Congressional districts are still active in MCVR, so no additional work needs to be done by local election authorities to select those districts to use for the November 3, 2026 General Election.

17. If the 2025 Congressional districts were suspended before the statutory deadline of September 8, 2026, local election officials would be able to utilize the 2022 Congressional district in MCVR and set up the election and create ballots with those districts.

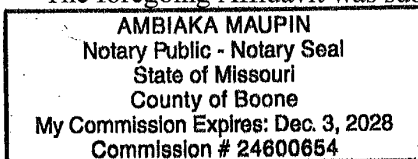
18. From a technological standpoint, I do not have concerns about local election officials holding an election in November 2026 using the 2022 Congressional districts.

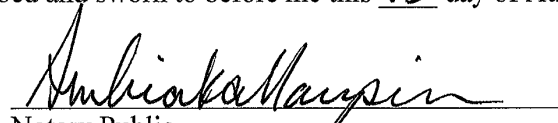
STATE OF MISSOURI)
) ss.
COUNTY OF BOONE)

I, Brianna Lennon, being duly sworn on oath state that the above and foregoing Affidavit is true and correct to the best of my knowledge, information, and belief.


BRIANNA LENNON

The foregoing Affidavit was subscribed and sworn to before me this 13th day of August, 2026.




Notary Public

My commission expires: 12-3-2028

SC101805 Appeal Document Number 44 Page 1

Stipulated Exhibit 22

**IN THE MISSOURI COURT OF APPEALS
WESTERN DISTRICT**

<i>State of Missouri ex rel. PEOPLE NOT</i>	)	
POLITICIANS, <i>et al.</i> ,	)	
	)	
Relators,	)	
	)	
v.	)	No. _____
	)	
HON. CHRISTOPHER K. LIMBAUGH,	)	
Judge of the Circuit Court	)	
of Cole County, Missouri,	)	
	)	
Respondent.	)	

MOTION TO EXPEDITE CONSIDERATION OF WRIT OF PROHIBITION

Pursuant to Rule 84.01, Relators respectfully move this Court for an order expediting consideration of this writ of prohibition. In support of this Motion, Relators state:

1. The core issue in the underlying case is whether the Secretary of State can deem nearly 100,000 signatures gathered in support of a referendum petition invalid—and refuse to send them to local election authorities for further processing—based on the date those signatures were gathered.

2. As explained in the Petition and Suggestions in Support, local election authorities’ signature validation efforts are currently underway, but the Secretary has refused to transmit nearly a third of the signatures gathered in support of a referendum to the local election authorities for processing.

3. As also explained in the Petition and Suggestions in Support, this is a time-sensitive election case that will impact the 2026 election. If Respondent does not rule

promptly, there is significant risk of chaos in August, when the Secretary has indicated he plans to make a decision on the sufficiency or insufficiency of the referendum petition.

There is significant risk of this case running into the statutory deadline for altering ballots and creating the problems the Supreme Court warned against in *Coleman v. Ashcroft*, 696 S.W.3d 347 (Mo. banc 2024).

4. This case was tried to Respondent on December 8, 2025. The record is closed and all facts necessary to resolve this case and ensure local election authorities have time to perform their work are before Respondent.

5. Relators asked Respondent at status conferences in January, February, and March to render a final, appealable judgment so that—if necessary—Relators can seek appellate review and obtain meaningful relief.

6. To date, Respondent still has not issued a judgment or ruled on Relators' March 6, 2026 Motion to End Abeyance and Render Judgment.

7. Relators respectfully request the Court to expedite consideration of this writ to protect the rights that have been placed at risk by Respondent's failure to fully and finally adjudicate this case.

For the reasons set forth above, Relators request this Court expedite consideration of Relators' Petition.

Respectfully Submitted,

STINSON LLP

/s/ Charles W. Hatfield

Charles W. Hatfield, #40363

Jeremy A. Root, #59451

Alexander C. Barrett, #68695

Alixandra S. Cossette, #68114

Greta M. Bax, #73354

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alixandra.cossette@stinson.com

greta.bax@stinson.com

Attorneys for Relators

Stipulated Exhibit 23

IN THE MISSOURI COURT OF APPEALS
WESTERN DISTRICT

State of Missouri ex rel. PEOPLE NOT	)	
POLITICIANS, et al.,	)	
	)	
Relators,	)	
	)	
v.	)	No. _____
	)	
HON. CHRISTOPHER K. LIMBAUGH,	)	
Judge of the Circuit Court	)	
of Cole County, Missouri,	)	
	)	
Respondent.	)	

**SUGGESTIONS IN SUPPORT OF
PETITION FOR A WRIT OF PROHIBITION**

The Missouri Constitution commands its courts to be open and to administer justice without delay. Mo. Const. Art. I § 14. The Constitution also “guarantees the right of referendum to *all* Missouri citizens.” *No Bans on Choice v. Ashcroft*, 638 S.W.3d 484, 491 (Mo. banc 2022). This case arises from the intersection of these constitutional provisions, as Respondent’s unreasonable, *sua sponte* decision to hold this case in abeyance after trial is enabling and protecting the Secretary’s decision to withhold validation of roughly 100,000 signatures in support of the referendum.

The law is clear that when the Secretary chooses to have local election authorities review referendum signatures, he has a duty to send “all” submitted signatures for review, not just the ones he chooses to send. § 116.130.1(1), RSMo (“Copies of all pages from not less than one petition shall be received in the office of the election authority”) The facts are clear that the Secretary has failed in this duty. Relators have

repeatedly urged Respondent to issue a final, appealable decision, but he has not done so. Given the looming election deadlines, the vital significance of the legal and constitutional issues, and the irreparable harm that flows to Relators from continued delay, a Writ of Prohibition is warranted.

This Court should issue its writ of prohibition ordering Respondent to take no action other than to vacate his December 12, 2025 order holding the underlying case “in abeyance” and enter a final, appealable judgment forthwith.

I. A Writ of Prohibition Should Issue Requiring Respondent to Vacate the Abeyance Order.

“A writ of prohibition is appropriate if it is necessary to preserve ‘the orderly and economical administration of justice’” *State ex rel. Delmar Gardens N. Operating, LLC v. Gaertner*, 239 S.W.3d 608, 610 (Mo. banc 2007) (citation omitted). The Court can also issue a writ to correct an abuse of discretion or prevent irreparable harm. *See State ex rel. Sasnett v. Moorhouse*, 267 S.W.3d 717, 720 (Mo. App. 2008). Here, all three grounds merit a writ.

Respondent’s *sua sponte* decision to hold the case in abeyance, after the Secretary and Attorney General have announced their preference for delay, “is so unreasonable and arbitrary that it shocks the sense of justice and indicates a lack of careful, deliberate consideration.” *Hanshaw v. Crown Equip. Corp.*, 2026 WL 512824, at *2 n.2 (Mo. banc Feb. 24, 2026). And when the interplay between the statutory requirements and deadlines for verification, certification, and changes to the ballot are included in the consideration, his ongoing refusal to render a decision is “clearly against the logic of the

circumstances.” *Id.* The abeyance order threatens irreparable harm to Relators (and the public interest), and a writ of prohibition is therefore “necessary to preserve the orderly and economical administration of justice.” *Delmar Gardens N. Operating, LLC*, 239 S.W.3d at 610.

A. Election Cases Should Be Decided Without Delay

Respondent’s *sua sponte* decision to hold the case in abeyance runs counter to decades of Missouri jurisprudence requiring election cases to be resolved without delay. “There are compelling reasons for [courts] to promptly hear and rule on cases having effect on elections in view of the short timetables involved.” *State ex rel. Teichman v. Carnahan*, 357 S.W.3d 601, 603 (Mo. banc 2012). Missouri Courts regularly expedite election cases. *See, e.g.*, Order, *Coleman v. Ashcroft*, No. SC100742 (Mo. banc Sept. 10, 2024) (resolving election challenge two business days after trial court ruling and on eve of deadline to modify ballots); Order, *Toder v. Uccello*, No. WD88582 (Mo. App. Jan. 1, 2026) (setting briefing and oral argument to be completed less than one month after appeal in ballot title challenge); Order, *People Not Politicians v. Hoskins*, No. WD88795 (Mo. App. Mar. 27, 2026) (same).

The statutory schemes related to elections also provide strict deadlines, requiring cases to be placed at the top of the docket and decided without delay. §§ 115.535 and 115.551, RSMo. Ballot title cases must be filed within ten days and placed at the top of the docket. § 116.190, RSMo. Cases concerning the validity of the Secretary’s sufficiency determinations on referenda must also be filed within ten days of the Secretary’s decision. § 116.200, RSMo.

Respondent's order holding the case in abeyance will steer this case directly into the statutory deadlines governing challenges to the Secretary's certification decision on the Referendum and the statutory deadline for making changes to the ballot. § 115.125.3, RSMo ("No court shall have the authority to order an individual or issue be placed on the ballot less than eight weeks before the date of the election."). This is the exact scenario the Supreme Court of Missouri warned against in 2024. Litigants "who fear getting trapped between the Scylla and Charybdis of sections 116.200.1 and 115.125.3, or who wish to challenge the constitutional validity of either statute, should give thought to at least attempting to assert their form-related claims at the beginning of the process." *Coleman v. Ashcroft*, 696 S.W.3d 347, 354 (Mo. banc 2024).

Relators took this admonition to heart and asserted their form-related claims at the very "beginning of the process," before signature gathering was complete and the case was tried before the Referendum was submitted. Yet, Respondent's unreasonable abeyance order places them directly into the Supreme Court's well-described trap. As the Supreme Court expressly held, there is "no . . . justification for delaying to the very end of the process claims regarding the form of the petition." *Id.*

This Court should issue its writ of prohibition requiring Respondent to vacate his abeyance order and enter a prompt decision resolving the parties' dispute regarding the Secretary's decisions to reject the referendum as to form and to withhold verification from signatures collected prior to the Secretary's approval as to form.

B. The Abeyance Here is an Abuse of Discretion

Respondent's *sua sponte* decision to hold this case in abeyance and his ongoing refusal to render a decision is "clearly against the logic of the circumstances." *Hanshaw*, 2026 WL 512824 at *2 n.2. As detailed above, time-sensitive election cases generally require expedited consideration by the courts. The specific action involved in this case is the verification of roughly 100,000 signatures to determine whether the signers are registered voters in Missouri. As it stands, Respondent's order enables the Secretary's lawless course of action – withholding roughly 100,000 signatures from being verified – to persist until a certification decision without a judicial determination of whether the Secretary's decision is lawful.

How Missouri law requires the Secretary to handle those signatures is the precise issue presented in the case. As Relators feared when they filed suit, the Secretary has refused to deliver roughly 100,000 signatures to local election authorities for validation, as he must. *See* §116.130, RSMo. Respondent's abeyance order authorizes the Secretary's inaction to continue without judicial review until August 2026, with a September statutory deadline for changes to the ballot looming. This unreasonable decision functionally deprives the parties of a meaningful opportunity to obtain appellate review. As the Supreme Court has held, this writ should issue "to preserve 'the orderly and economical administration of justice'. . . ." *Delmar Gardens N. Operating, LLC*, 239 S.W.3d at 610 (citation omitted).

The Secretary has specifically indicated to Respondent he does not plan to make a certification decision until August 2026. Ex. 33 at 808-809, 814-815. Should the

Secretary reject the Referendum as insufficient for containing an inadequate number of signatures at that time, Relators will have until September 8, 2026 to (a) complete an entire appeal; (b) obtain review and validation of 100,000 signatures; and (c) place the qualified Referendum on the ballot for the general election. Given the time required for each of those steps, Respondent's decision "is so unreasonable and arbitrary that it shocks the sense of justice and indicates a lack of careful, deliberate consideration." *Hanshaw*, 2026 WL 512824, at *2 n.2. The Missouri Constitution does not permit Respondent to sit on the case in the hopes that it becomes moot. There is presently a live controversy and Respondent should be commanded to decide it without further delay. Mo. Const. art. I, § 14.

C. No Authority Authorizes Respondent to Refuse to Decide This Case

This Court can also issue its writ of prohibition because Respondent lacks authority to hold the case in abeyance. *See State ex rel. Bailey v. Sengheiser*, 692 S.W.3d 20, 25 (Mo. banc 2024) (issuing writ of prohibition where trial court lacked authority to enter order). There is no Supreme Court Rule authorizing Respondent to hold the case in abeyance post-trial. Nor is there any case law approving this practice. The Missouri Constitution requires courts to be open and to resolve disputes "without delay." Mo. Const. art. I, § 14. In extreme cases, a trial court's unwillingness to resolve cases can amount to judicial misconduct. *See In re McGaugh*, 705 S.W.3d 535, 543 (Mo. banc 2025) (suspending judge for one year because "parties could not obtain finality in critically important, time-sensitive cases").

What little authority there is in Missouri for courts holding a case in abeyance provides no support for Respondent's action here. "When a matter is held in abeyance it is in a condition of being undetermined. It is not finally settled." *Savannah Place, Ltd. v. Heidelberg*, 164 S.W.3d 64, 66 n.4 (Mo. App. 2005) (quotations omitted). This case is fully tried and submitted. While the related question of whether the referendum is sufficient will be determined by the Secretary pursuant to Missouri law is still pending, the process questions in this case are fully developed. This is not a case with a limited-purpose remand. *See, e.g. State v. Thomas*, 801 S.W.2d 504 (Mo. App. 1991) (holding appeal in abeyance during such remand); *State v. Wakefield*, 689 S.W.2d 809 (Mo. App. 1985) (same); *G & S Masonry, Inc. v. MJC Constructors, Inc.*, 164 S.W.3d 530, 533 (Mo. App. 2005) (same); *State v. Anderson*, 580 S.W.2d 553, 554 (Mo. App. 1979) (same). Nor is it a case holding a verdict in abeyance while liability is determined. *See Brickner v. Normandy Osteopathic Hosp., Inc.*, 687 S.W.2d 910, 913-14 (Mo. App. 1985).

The two cases Intervenor cited below to support an abeyance are irrelevant and distinguishable. Ex. 35 at 965-966. In *Knapp v. Missouri Local Government Employees Retirement System*, 738 S.W.2d 903 (Mo. App. 1987), a plaintiff prematurely filed an action for judicial review of an agency decision and the parties *stipulated* to holding the case in abeyance. *Id.* at 907. *Knapp* is simply irrelevant. In *Logan v. Sho-Me Power Elec. Co-op.*, 122 S.W.3d 670 (Mo. App. 2003), the case involved parallel wrongful death proceedings in the trial court and the Labor and Industrial Relations Commission. The Court of Appeals concluded the trial court should have held the wrongful death case in

abeyance during the pendency of the workers' compensation review to avoid the risk of prejudice to the wrongful death Plaintiff from the running of the statute of limitations. While in *Logan*, the abeyance protected the Plaintiffs' right to sue, in this case, Respondent's unreasonable decision to forbear issuing judgment threatens the very rights that Relator seeks to protect. Neither case supports Respondent's abeyance.¹

D. No More Factual Development Is Needed

This case presents two straightforward legal questions: (1) whether the lack of the Governor's signature on a bill is a "matter of form" that allows the Secretary to reject a referendum petition and (2) whether signatures on a referendum petition can be deemed invalid solely on the basis that they were gathered before the Secretary's approval as to form. The parties stipulated to all relevant facts. The Secretary *agrees* "all facts have been stipulated (or elicited in cross examination) and legal issues briefed." Writ Ex. 37 at 983. These are not difficult questions –controlling case law conclusively answers both.

As to the first question, "the secretary of state's authority to review a referendum petition sample sheet for sufficiency as to form does not extend to substantive matters including, without limitation, determining compliance with the Missouri Constitution." *ACLU v. Ashcroft*, 577 S.W.3d 881, 892 (Mo App. 2019). The Secretary's conclusion (in September 2025) that Relators were not permitted to initiate a referendum on a bill that

¹As there is no authority for Respondent to hold this case in abeyance, this Court could issue its writ of prohibition requiring Respondent to lift the abeyance without concluding that doing so would be an abuse of discretion. "A writ of prohibition is appropriate to remedy an excess of authority" *State ex rel. Monsanto Co. v. Mullen*, 672 S.W.3d 235, 239 (Mo. banc 2023).

had not been signed by the Governor is a matter of substance, not form. Ex. 10 at 368). Indeed, the rejected form is completely identical to the approved form, differing only in the dates of its submission and the Secretary's approval. *See* Ex. 20 at 618-619. The record is closed and a decision should be made.

As to the second question, nothing in the Constitution or statutes requires approval as to form to predate a registered voter signing a referendum petition. Section 116.332.1 merely requires that a referendum sample sheet be *submitted* to the Secretary before circulation. It does not require approval as to form before signatures may be gathered. The Supreme Court has invalidated any such requirement as an unconstitutional impediment to the people's right to the referendum. *No Bans on Choice v. Ashcroft*, 638 S.W.3d 484, 492 (Mo. banc 2022).

E. This Case Is Not Moot and Hypothetical Future Events Are Irrelevant Because an Exception to Mootness Will Apply

The issue here is *not* whether this case is *currently* moot. The mootness concept that animated Respondent's abeyance order is whether the case will become moot if the Secretary concludes there are sufficient signatures without the 100,000. *See* Ex. 24 at 732. It will not. The Supreme Court addressed a remarkably similar issue a few years ago in *No Bans on Choice*. The underlying issue there – as here – involved the Secretary of State using procedural processes related to a referendum to shorten the available time to collect signatures. Even when no signatures were submitted to the Secretary, the Supreme Court concluded the rights at stake in the referendum process brought the case “squarely within the mootness exception of ‘capable of repetition, yet evading review.’” 638 SW.3d

at 490 n.9. Here, the signatures have been submitted and the controversy is live.

Respondent's improper abeyance order is the only thing preventing it from being resolved.

F. This Case Is Ripe and Even If It Were Not, Dismissal Would be the Proper Course of Action

The Secretary has alternatively argued Respondent is correct to hold this case in abeyance because the case is not ripe. The ripeness issues have been fully briefed to Respondent, and he is simply refusing to rule. As explained to Respondent, this case is unquestionably ripe in light of the Secretary's refusal to even review *one-third* of the signatures submitted. Ex. 29 at 768-776. At present, this is *not* a case "wherein adequate relief can be afforded through an appeal." *State ex rel. Henderson v. Asel*, 566 S.W.3d 596, 598 (Mo. banc 2019). Relators are entitled to relief because Respondent will not decide this case *so that* a timely appeal can follow.

Even if Respondent were to agree this case is not ripe, the proper thing to do is to dismiss the case, not hold it in abeyance. Dismissing the case for want of a justiciable controversy will permit an appeal. *Id.* at 600 n.6 (dismissals in these circumstances are "final and appealable"). In either event, withholding judgment is causing significant prejudice to Relators, is inconsistent with the Constitution's Open Courts provision, and risks creating a need for emergency pre-election appeals that would not exist but for Respondent's improper abeyance order.

WHEREFORE, for the reasons set forth above and in the Petition contemporaneously filed herewith, Relators request the Court:

1. Issue its preliminary writ of prohibition directing Respondent to show cause why the December 12, 2025 abeyance order should not be vacated and he should not be directed to promptly enter a judgment;
2. Upon submission, make the writ permanent and direct Respondent to vacate the December 12, 2025 abeyance order and direct Respondent to enter judgment forthwith;
3. Grant such other and further relief as just and proper.

Respectfully Submitted,

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Attorneys for Relators

Stipulated Exhibit 24

IN THE SUPREME COURT OF MISSOURI

MERRIE SUZANNE LUTHER,	)	
<i>et al.</i>	)	
	)	
Appellants,	)	
	)	
v.	)	No. SC101412
	)	
DENNY HOSKINS,	)	
	)	
Respondent,	)	
	)	
and	)	
	)	
MISSOURI REPUBLICAN STATE	)	
COMMITTEE	)	
	)	
Intervenor-Respondent.	)	

MOTION TO EXPEDITE APPELLATE PROCEEDINGS

Appellants Merrie Suzanne Luther, Kim Randolph Davis, Rebeca Amezuca-Hogan, and Kenneth Lawrence Chumbley move this Court for an Order expediting all proceedings in this appeal, including resolution of the merits. In support, Movants state:

1. This matter involves Appellants' challenge to the constitutionality of House Bill 1 (2025) purporting to put in place a new congressional map for the 2026 election.
2. After a bench trial, the Trial Court entered its Judgment on December 9, 2025, finding in favor of Respondents. Thereafter, on December 15, 2025, Appellants filed their notice of appeal.

3. On December 19, 2025, pursuant to Rule 81.045, Appellants filed a Motion to Shorten Time for the judgment to be made final.
4. On December 30, 2025, the trial court, on its own motion, deemed the judgment to be final under Rule 81.045.
5. This case involves legislation adopted by the General Assembly on September 12, 2025 governing which districts will be in place for the 2026 congressional election.
6. Candidate filing for 2026 general election opens on February 24, 2026. A quick resolution to this matter prior to opening of candidate filing will provide certainty to all parties involved in this matter, as well as the general voting public, election officials, and candidates intending to file for Congress.
7. There are currently at least 3 lawsuits pending in the lower courts regarding HB 1.¹ The outcome of this appeal could moot those lawsuits.
8. There are currently 3 lawsuits² pending in the lower courts regarding a proposed referendum on HB 1. The outcome of this appeal could moot those lawsuits.

¹ *Healey et al., v. State*, No. 2516-CV31273 (Jackson Cnty. 2025); *Wise et al., v. State*, No. 2516-CV29597 (Jackson Cnty. 2025); *NAACP, et al., v. Kehoe, et al.*, No. 25AC-CC06724 (Cole Cnty. 2025).

² *People Not Politicians v. Hoskins*, No. 25AC-CC07128 (Cole Cnty. 2025); *People Not Politicians v. Hoskins*, No. 25AC-CC08724 (Cole Cnty. 2025); *Maggard et al., v. State*, No. 25AC-CC09120 (Cole Cnty. 2025). There is also a writ proceeding related to Case No. 25AC-CC07128. See *State ex rel. People Not Politicians v. Limbaugh*, No. WD88522 (Mo. App. W.D. 2025).

9. The outcome of a federal lawsuit may be affected by resolution of this appeal. *Missouri General Assembly, et al., v. von Glahn, et al.*, No. 4:25-cv-01535 (E.D. Mo. Dec. 8, 2025).
10. No party will be prejudiced by an expedited schedule and resolution. The issues here are purely legal and the record below was created on stipulated facts and exhibits. The parties have already and recently briefed and argued the very issues involved in this appeal and are, therefore, well-suited to submit briefing and argument before this Court on an expedited basis.
11. Movants respectfully request that the Court adopt a briefing and submission schedule reflecting the need to resolve this matter prior to candidate filing opening on February 25, 2026. To that end Movants suggest that Appellants file their brief on January 12, 2026; Respondents file their briefs on February 9, 2026 and Appellants file their reply brief on February 16, 2026.

WHEREFORE, Movants respectfully request this Court enter its order expediting appellate proceedings in this matter, adopting an expedited briefing and final resolution timeline, and for such other relief as the Court deems proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of December, 2025, I electronically filed the foregoing with the Clerk of the Court via the Court's electronic filing system which sent notification to all counsel of record.

/s/ Alixandra S. Cossette

Stipulated Exhibit 25

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

TERRENCE WISE, et al., Plaintiffs, v. STATE OF MISSOURI, et al., Defendants.	Case No. 2516-CV29597 Division 15
ELIZABETH HEALEY, et al., Plaintiffs, v. STATE OF MISSOURI, et al., Defendants.	Case No. 2516-CV31273 Division 15

**PLAINTIFFS’ SUGGESTIONS IN OPPOSITION TO STATE DEFENDANTS’ MOTION
TO CONTINUE TRIAL SETTING**

The *Wise* and *Healey* Plaintiffs oppose the motion to continue trial setting filed by the State of Missouri and Secretary of State Denny Hoskins (“State Defendants”), filed nearly two weeks after this Court ordered the January 26, 2026 trial date for a four-day trial, and nearly three weeks after State Defendants were provided notice of the January 26 trial date.

In opposition to State Defendants’ motion, Plaintiffs state as follows:

1. Time is of the essence in this case. Missouri’s candidate filing period for the 2026 primary elections opens on Tuesday, February 24, 2026. *See* § 115.349, RSMo. Trial in this matter is scheduled to begin less than one month before that deadline. State Defendants now seek a continuance of more than three weeks—one that would push the conclusion of trial to February

20, just four days before candidate filings begin. Granting that request would seriously endanger the opportunity for meaningful relief before the midterm elections.

2. Plaintiffs challenge the constitutionality of House Bill 1 (“HB 1”), a new mid-decade congressional map intended to govern the 2026 general election.

3. The General Assembly adopted HB 1 during a special session in September 2025, in contravention of Article III, Section 45’s prohibition on mid-decade redistricting and the General Assembly’s consistent practice under that provision. Because the legislation was adopted just months before election-related deadlines for the 2026 congressional election, Plaintiffs filed suit immediately and sought expedited relief.

4. The *Wise* Plaintiffs filed their suit on September 12, 2025, the day the General Assembly passed HB 1.

5. The *Wise* Plaintiffs filed a Motion for Scheduling Conference, Preliminary Injunction Hearing, and Order Consolidating Separate Trial on Count I with Preliminary Injunction Hearing and Suggestions in Support on September 19, 2025.

6. The *Healey* Plaintiffs filed their suit on September 28, the day the Governor signed HB 1.

7. The *Wise* and *Healey* Plaintiffs both sought a preliminary injunction and consolidated trial on the merits of their purely legal claim that HB 1 violates the Missouri Constitution’s prohibition on mid-decennial congressional redistricting (Count I).

8. The *Wise* and *Healey* Plaintiffs also brought claims alleging that HB 1 violates the Missouri Constitution’s compactness requirement for congressional maps (Count II). The *Wise* Plaintiffs further allege that HB 1 violates the Missouri Constitution’s equal population requirement (Count III) and contiguity requirement (Count IV) for congressional maps.

9. State Defendants subsequently filed motions to dismiss both sets of Plaintiffs’

claims and refused to file responses to the Plaintiffs' motions for a preliminary injunction in the time required by the local rules. State Defendants filed the Motion to Dismiss in the *Wise* case on September 19, 2025, and in the *Healey* case shortly thereafter.

10. On November 24, 2025, this Court held a hearing on those motions. During the hearing, the Court discussed potential trial dates with the parties at length.

11. The Court indicated it would set trial on Count I for December 16, 2025.

12. The Court also indicated it would set a four-day trial on the remaining counts for January 26 through January 29, 2026. The Court instructed the parties to work together to propose a joint scheduling order as soon as possible.

13. During the hearing, counsel for the Jackson County Board of Election Commissioners and the Kansas City Election Board noted that the filing period for congressional candidates begins on February 24, 2026, and that implementing the congressional map ahead of that deadline could take about four weeks.

14. Because of this discussion, all parties present at the hearing were on notice about the time-sensitive nature of the trial setting.

15. State Defendants indicated at the November 24, 2025 hearing that they would check on their preferred expert witness's availability. However, in the nearly two weeks that followed, State Defendants did not alert the other parties or the Court of any specific conflicts their expert would have with the January 26, 2026 trial date.

16. On December 1, 2025, the Court entered an order setting a bench trial on Count I for December 16, 2025, and on the remaining counts for January 26, 2026.

17. On December 4, 2026, Plaintiffs sent Defendants a proposed pretrial schedule for the January 26, 2026 trial and requested the opportunity to meet and confer on the schedule. On December 9, 2026, State Defendants informed Plaintiffs that their preferred expert *might* have a

conflict with the January 26, 2026 trial date because of a two-to-three-week trial in another matter that will also begin on January 26, 2026. State Defendants indicated that their preferred expert is not expected to testify in that matter during the week of January 26, but instead would be observing other witnesses testify on yet-to-be-determined dates. Based on State Defendants' representation, it is not at all clear that their preferred expert has a definite conflict. State Defendants do not yet know which dates their witness plans to observe testimony in Mississippi, and it may well be possible for their witness to participate in both trials.

18. Indeed, an obvious solution for this purported conflict is that the State Defendants' preferred expert could simply read the rough trial transcripts for the days of testimony in the Mississippi case that he would miss by being present for the trial in this case. That is commonly how experts digest trial testimony in advance of their own testimony.

19. Plaintiffs made clear they are willing to work with State Defendants to accommodate their preferred expert's schedule within the trial dates set by the Court, but they do not believe the availability of a single preferred expert should dictate the timing of trial. Plaintiffs also raised the possibility of other, less disruptive alternatives, such as having State Defendants' preferred expert observe the Mississippi trial remotely or testify remotely in this case, to which State Defendants offered no clear answer. Even if State Defendants' preferred expert is ultimately unavailable, it would not be unreasonable under the circumstances for State Defendants to retain an alternative expert who is available. State Defendants have made no showing that their preferred expert is uniquely essential or that no other qualified expert is reasonably available.

20. On December 10, 2025, the Court entered an order denying State Defendants' Motion to Dismiss. The Court stayed proceedings on Count I, canceled the December 16, 2025 trial on Count I, and specifically noted that "[t]he bench trial on the other counts remain set."

21. On the evening of December 12, 2025, State Defendants informed Plaintiffs via

email that they intended to file a motion to continue the trial to February 17, 2026, or a later date.

22. By taking nearly three weeks to confirm their preferred experts' availability and to communicate the issue to Plaintiffs and the Court, State Defendants have caused unnecessary delay that prejudices Plaintiffs and jeopardizes the likelihood that a lawful map will be implemented in the 2026 general election, regardless of the merits of Plaintiffs' claims.

23. Had State Defendants diligently confirmed their preferred expert's availability and identified the conflict to Plaintiffs and the Court promptly, the parties could have considered whether an earlier trial date might be amenable to the parties and their witnesses.

24. State Defendants' failure to timely confirm their preferred experts' availability should not determine whether Plaintiffs can obtain effective relief in this case.

25. Plaintiffs will suffer irreparable harm if they are forced to vote under HB 1's unlawful map in the upcoming 2026 congressional elections.

26. Once an election occurs under an unlawful map, "there can be no do over and no redress" for voters. *League of Women Voters of U.S. v. Newby*, 838 F.3d 1, 9 (D.C. Cir. 2016) (quoting *League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4th Cir. 2014)).

27. If trial on Counts II-IV does not occur in January 2026, it is highly likely that a court would need to alter Missouri's election deadlines in order to provide relief on those claims ahead of the 2026 general election.

28. State Defendants have therefore failed to show good cause to continue the January 26, 2026 trial. *See* Rule 65.01 (permitting a continuance only "[f]or good cause shown").

29. The Court should maintain the January 26, 2026 trial date. State Defendants are free to retain an alternate expert witness. Or, if State Defendants intend to use the expert witness appearing in *Harris v. DeSoto County*, No. 3:24-CV-289-GHD-RP (N.D. Miss. filed Sep. 12, 2024), Plaintiffs stand ready to coordinate with State Defendants to schedule that expert's

testimony within the January 26–29, 2026 trial during a time window that is least disruptive. Alternately, Plaintiffs are willing to agree to the State Defendants’ preferred expert appearing remotely during the trial, or stand ready to work with State Defendants to designate the expert’s testimony via a videotaped trial deposition in lieu of live trial testimony. *See* Rule 57.07(a) (“Depositions may be used in court for any purpose.”).

30. In the alternative, Plaintiffs request that the Court reset trial on Counts II-IV to commence on an earlier date, such as January 20, 2026.

31. To the extent the Court is inclined to grant State Defendants’ request to reset trial to a later date, State Defendants should be precluded from arguing that it is too late to effectuate injunctive relief on Plaintiffs’ claims, and should be precluded from opposing this Court modifying or postponing deadlines on the State’s election calendar to effectuate relief in the event that Plaintiffs prevail on the merits of this case.

WHEREFORE, Plaintiffs request this Court deny State Defendants’ motion to continue and maintain the January 26, 2026 trial or set trial for an earlier date.

Dated: December 15, 2025

Respectfully submitted,

/s/ Gillian R. Wilcox

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Certificate of Service

I certify that, on December 15, 2025, the foregoing was filed on the Missouri CaseNet e-filing system, which will send notice to all counsel of record.

/s/ Gillian R. Wilcox

Stipulated Exhibit 26

**IN THE CIRCUIT COURT OF
COLE COUNTY, MISSOURI**

JAKE MAGGARD et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 25AC-CC09120
	)	
STATE OF MISSOURI et al.,	)	
	)	
Defendants.	)	

**PLAINTIFFS’ SUGGESTIONS IN SUPPORT OF
MOTION FOR PRELIMINARY INJUNCTION AND
CONSOLIDATION WITH HEARING ON MERITS**

Pursuant to Rule 92.02(c), Mo. S. Ct. R., Plaintiffs Jake Maggard and Gregg Lombardi move for a preliminary injunction. Additionally, pursuant to Rule 92.02(c)(3), Plaintiffs request that the Court order that trial on the merits be advanced and consolidated with the preliminary-injunction hearing.

INTRODUCTION

“The voters of Missouri first adopted a constitutional amendment establishing the right of referendum more than 100 years ago,” “reserv[ing] a share of the legislative power for themselves” and “ensur[ing] that ‘those who have no access to or influence with elected representatives may take their cause directly to the people.’” *No Bans on Choice v. Ashcroft*, 638 S.W.3d 484, 486, 489 (Mo. banc 2022) (quoting *Missourians to Protect Initiative Process v. Blunt*, 799 S.W.2d 824, 827 (Mo. banc 1990)). Because the People’s referendum power is meant “to serve as a check on the legislature,” *id.* at 489, referred legislation is necessarily suspended until a referendum vote occurs. This *must* be the rule; otherwise,

referred legislation could take effect before the People have their say, vitiating the referendum process and rendering these constitutional provisions decidedly hollow.

Logic and precedent notwithstanding, Defendants have taken the position that House Bill 1 (“HB1”)—an act creating new congressional districts in Missouri that has been referred to the People for approval or rejection—is currently in effect, and they intend to use its new map in the upcoming midterm elections. Defendants are wrong: Upon the submission of 691 boxes of signed referendum petitions to the Secretary of State’s office on December 9, 2025, HB1 was suspended as an operation of law, and it remains so until either the referendum vote occurs or the referendum is deemed insufficient or otherwise invalid. In the meantime, HB1’s new congressional map cannot be used without violating the referendum provisions of the Missouri Constitution. Immediate relief is therefore required to vindicate the People’s referendum rights and prevent the imposition of irreparable injury on Plaintiffs and all Missouri voters.

This case ultimately presents a narrow legal question and rests on only a few undisputed, judicially noticeable facts. The issue is *not* how, whether, or when Secretary of State Denny Hoskins verifies the 300,000-plus submitted signatures under the referendum statutes; those decisions are up to him. Instead, the dispositive question before the Court is straightforward: What is the status of HB1 in the meantime, while the signatures are being verified? Longstanding Missouri

Supreme Court precedent and logic compel the same result. HB1 *must* be suspended to preserve Missourians' constitutional referendum powers.

BACKGROUND

On September 12, 2025, the General Assembly truly agreed to and finally passed HB1, an act “to enact . . . twelve new sections relating to the composition of congressional districts.” Ex. 3 (HB1, 103d Gen. Assemb., 1st Reg. Sess., 2d Extraordinary Sess. (Mo. 2025)). HB1 redrew Missouri's congressional map, with the new districts to be “[e]ffective with the election of the 120th Congress.” *Id.* HB1 did *not* include an emergency clause affecting the People's referendum rights. *See id.*

Secretary Hoskins received a petition for referendum asking to refer HB1 to voters for approval or rejection, which he denominated 2026-R004. Ex. 3 (*Referendum for House Bill 1, 2026-R004*, Mo. Sec'y of State, <https://bit.ly/49pbtD6> (last visited Jan. 13, 2025)).¹ Secretary Hoskins certified the official ballot title on November 13, 2025. *Id.* Because the special session that enacted HB1 adjourned on September 12, *see* Ex. 5 (*Journal of the House*, Mo. House of Reps. (Sept. 12, 2025), <https://bit.ly/45yvYek>); Ex. 6 (*Journal of the Senate*, Mo. Sen. (Sept. 12, 2025), <https://bit.ly/4qKzBG2>), supporters of 2026-R004 had 90 days—

¹ Missouri courts can take judicial notice of government documents. *See, e.g., Schweich v. Nixon*, 408 S.W.3d 769, 778 & n.11 (Mo. banc 2013) (per curiam); *Gershman Inv. Corp. v. Danforth*, 475 S.W.2d 36, 37–38 & n.2 (Mo. banc 1971); *Brown v. Morris*, 290 S.W.2d 160, 167–68 (Mo. banc 1956).

until December 11—to submit approximately 107,000 signatures from 6 of Missouri’s 8 congressional districts, *see* Mo. Const. art. III, § 52(a).

On December 9, 2025, the Secretary of State’s office received 691 boxes of referendum petitions for HB1, *e.g.*, Ex. 7 (*128.345. Definitions.*, Revisor of Mo., <https://bit.ly/451HbUG> (last visited Jan. 13, 2026)); Ex. 8 (2026-R004 box receipt); Ex. 9 (2026-R004 receipt form), which reportedly contained more than 300,000 signatures, *e.g.*, Ex. 10 (David A. Lieb & Hannah Schoenbaum, *Opponents of Trump-Backed Redistricting in Missouri Submit a Petition to Force a Public Vote*, PBS News (Dec. 10, 2025), <https://bit.ly/491AIKs>). Secretary Hoskins has not issued a certificate of insufficiency for 2026-R004 under Section 116.150(2), RSMo. *See* Ex. 3. Nevertheless, HB1 purportedly took effect on December 11, 2025. *See* Ex. 11 (*Chapter 128 Election of Electors and Electoral Districts—Congressional Districts*, Revisor of Mo., <https://bit.ly/4qKzTg6> (last visited Jan. 13, 2026)).

Plaintiffs are Jackson County residents and qualified Missouri voters. Ex. 1 ¶ 3 (declaration of Jake Maggard); Ex. 2 ¶ 3 (declaration of Gregg Lombardi). They are both residents of the Fifth Congressional District under Missouri’s 2022 redistricting map and, under HB1, would be relocated to the Fourth Congressional District. Ex. 1 ¶ 4; Ex. 2 ¶ 4. And both signed the petition to refer HB1 to voters for approval or rejection. Ex. 1 ¶ 5; Ex. 2 ¶ 5.

ARGUMENT

Courts evaluating whether to grant preliminary relief consider “(1) the threat of irreparable harm to the moving party; (2) balancing this harm with any injury an injunction would inflict on other interested parties; (3) the moving party is likely to prevail on the merits; and (4) the effect on the public interest.” *Comprehensive Health of Planned Parenthood Great Plains v. State*, No. SC 101176, 2025 WL 2346611, at *2 (Mo. banc Aug. 12, 2025) (citation modified).

Here, each of these factors weighs in favor of immediate injunctive relief.

I. Plaintiffs are likely to succeed on the merits.

Under longstanding and well-settled authority, HB1 was suspended on December 9, 2025, when Secretary Hoskins received 691 boxes of signed referendum petitions. Plaintiffs are therefore likely to succeed on their claim that HB1’s new congressional map is suspended and its use prior to the referendum vote (or a final ruling that the referendum is invalid) violates the Missouri Constitution.

A. It has long been the law that referred legislation is suspended upon the submission of signed petitions.

Article III, Section 49 of the Missouri Constitution provides that “[t]he people . . . reserve power to approve or reject by referendum any act of the general assembly.” The referendum process is as follows:

A referendum may be ordered . . . by petitions signed by five percent of the legal voters in each of two-thirds of the congressional districts in the state Referendum petitions shall be filed with the secretary of state not more than ninety days after the final adjournment of the

session of the general assembly which passed the bill on which the referendum is demanded.

Mo. Const. art. III, § 52(a). Significantly, “[a]ny measure referred to the people shall take effect when approved by a majority of the votes cast thereon, *and not otherwise.*” *Id.* art. III, § 52(b) (emphasis added). In practice, this means that,

once a referendum petition has received sufficient signatures to be placed on the general election ballot, the referred measure is placed before the people for their consideration as an original proposition; the prior action by the General Assembly and the Governor on the referred measure is suspended or annulled, and has no further legal effect or consequence.

Stickler v. Ashcroft, 539 S.W.3d 702, 713 n.9 (Mo. App. W.D. 2017) (citation modified). This rule ensures that referred legislation is not made effective before the People exercise their right to approve or reject it, reflecting that the referendum power is meant “to serve as a check on the legislature.” *No Bans*, 638 S.W.3d at 489 (citing *State ex rel. Drain v. Becker*, 240 S.W. 229, 230–31 (Mo. banc 1922)).

This principle is not new: For more than a century, the Missouri Supreme Court has *repeatedly* emphasized that referred legislation is suspended—and cannot go into effect—until voters give their approval. After all, if “the Legislature may postpone the effective date of a law by an analogy of reasoning it must also follow that the operation of a statute may be deferred by the invocation of the referendum, for the exercise of legislative power by the people through the referendum is simply a reservation to themselves of a share of the legislature power.” *State ex rel. Barrett v. Dallmeyer*, 245 S.W. 1066, 1068 (Mo. banc 1922). Accordingly—and, until now, uncontroversially—“the mere lodging of a timely,

legal, and sufficient referendum petition with the Secretary of State is all that” must be done to “halt[]” the “law affected”—“regardless of any affirmative act on the part of the Secretary of State or the Attorney General.” *State ex rel. Kemper v. Carter*, 165 S.W. 773, 779 (Mo. banc 1914). The Supreme Court has emphasized that this position is logical to the point of obviousness:

When we consider the primary object of the adoption of the referendum and have regard to the evils which its friends had in mind to correct by it, any view other than that it suspends the taking effect of the act against which it is invoked till a vote be had is illogical and well-nigh unthinkable.

Id. at 778.

Consistent with this authority, prior Secretaries of State and Attorneys General have concluded that the suspension of referred legislation does not require the issuance of a certificate of sufficiency by the Secretary of State. For example, in 2017, the office of then-Secretary Jay Ashcroft announced that Missouri’s right-to-work law was suspended upon the submission of more than 300,000 signatures—even though the office still needed to conduct verification and issue a certificate. *See* Ex. 12 (Jo Mannies & Marshall Griffin, *Missouri’s Right-to-Work Law Suspended After Unions Turn in 300K Signatures for Statewide Vote*, St. Louis Pub. Radio (Aug. 18, 2017), <https://bit.ly/4jDHElU>). In support of this position, “[t]he secretary of state’s office provided . . . an electronic image of a 1982 newspaper story which reported that then Secretary of State James Kirkpatrick had determined [a] truck law was suspended after petition signatures were filed.”

Ex. 13 (Ashley Byrd, *Right to Work Law Appears Headed to a Public Votes as PR Efforts Start to Appear*, Missouri.net (Aug. 29, 2017), <https://bit.ly/3MQs3mD>).

More than a century of consistent authority and practice notwithstanding, Defendants now suggest that suspension of referred legislation occurs only when the Secretary of State certifies a referendum petition as legally sufficient. *See, e.g.*, Defs.’ Suggestions in Supp. of Mot. to Dismiss (“MTD”) 13–14. Their motion to dismiss cites no authority for this proposition, and little wonder—it risks the vitiation of the People’s referendum rights.

The referendum process is carefully designed to ensure that referred legislation *does not go into effect* until the People have their say. Consider the timing of the process: “Referendum petitions shall be filed with the secretary of state not more than ninety days after the final adjournment of the session of the general assembly which passed the bill on which the referendum is demanded.” Mo. Const. art. III, § 52(a). This ninety-day clock mirrors the effective date of legislation. *See id.* art III, § 29 (“No law passed by the general assembly . . . shall take effect until *ninety days* after the adjournment of the session . . . at which it was enacted.” (emphasis added)). The interplay of these constitutional provisions is apparent: Legislation goes into effect after ninety days *unless* a referendum petition is timely submitted suspending its effectiveness.

This conclusion has the support not only of the constitutional text but also intuition; simply put, it would make no sense for legislation to take effect only to be later suspended pending a referendum. The Missouri Supreme Court held as

much more than a half-century ago in a case *involving a referred congressional map*, explaining that, if Section 52(a) allowed effective legislation to later be suspended upon the submission of a referendum petition,

then great confusion will result and much mischief may ensue. . . .

To hold that § 52(a) has this effect would destroy the concept of the referendum. [The p]urpose of referendum is to suspend or annul a law which *has not gone into effect* and to provide the people a means of giving expression to a legislative proposition, and require their approval *before it become operative as a law*; and its purpose does not intend to invalidate a law already operative. . . .

It seems clear that the intendment of the framers of the Constitution was that all laws, except those declared non-referable, should be subject to referendum if petitions to refer them were duly filed before their effective date[.]

Moore, 250 S.W.2d at 706 (emphasis added) (citation modified). Referred legislation *must* be suspended before it goes into effect; otherwise, the purpose of the referendum process would be undermined (if not destroyed altogether).

Defendants’ position must therefore be rejected. The referendum statutes—which, of course, *cannot* trump the constitutional right to referendum, *see No Bans*, 638 S.W.3d at 492 (“The legislature must not be permitted to use procedural formalities to interfere with or impede this constitutional right that is so integral to Missouri’s democratic system of government.”)—give the Secretary of State until “the thirteenth Tuesday prior to the general election or two weeks after the date the election authority certifies the results of a petition verification . . . , whichever is later,” to issue a certificate of sufficiency, § 116.150(3), RSMo. Applied here, Secretary Hoskins has until August 4, 2026—*primary day*—to issue a certificate

for the HB1 referendum. *See* MTD 13 & n.8. Section 116.150, RSMo, thus allows the Secretary of State to certify a referendum long after the ninety-day default for legislative effectiveness. And since legislation *cannot* be subject to referendum if it has already gone into effect, suspension *must* occur before the deadline for the issuance of a certificate of sufficiency—specifically, at the time a referendum petition is submitted by the ninety-day constitutional deadline.²

This Court reached the same conclusion decades ago in a case involving the aforementioned 1980s trucking legislation. The plaintiffs in *Kaw Transport Co. v. Whitmer*, No. CV181-778CC (Cole Cnty. Cir. Ct. Sept. 29, 1981), argued that “a certification process by the Secretary of State [was required] before the staying effect of a referendum petition takes effect.” Ex. 14. The Court rejected the claim, explaining in part that “[t]he right of the people of this State . . . by use of the referendum process to stay the operation of legislative upon the happening of certain events, and to submit that legislation to a vote of all the people is superior to any right possessed by the plaintiffs.” *Id.* The *Kaw Transport* case was no outlier: Missouri’s judiciary, including the Supreme Court, has repeatedly rejected attempts to limit the People’s referendum power by manipulating timing and process. *See, e.g., No Bans*, 638 S.W.3d at 492 (statutory prohibition on collecting

² To the extent Section 116.150 or 116.130, RSMo, permits the Secretary of State to delay suspension of a referred law until the issuance of a certificate of sufficiency—and thus allows a referred law to go into effect—those statutes conflict with Article III, Sections 49, 52(a), and 52(b) of the Missouri Constitution, at least as applied to the facts here, and are unconstitutional.

referendum-petition signatures prior to Secretary of State's certification of official ballot title was unconstitutional because it "interferes with and impedes" constitutional right of referendum by unreasonably shortening timeframe for petition circulation); *Moore*, 250 S.W.2d at 706 ("To construe § 52(a) to prohibit referendum of laws made effective by § 29 would enable the general assembly to defeat the purpose of 52(a) by passing bills and then recessing for thirty days or more after prescribing by joint resolution that they should take effect ninety days after the beginning of the recess.").

None of this is to say that Secretary Hoskins has no recourse to *unsuspend* HB1 (or any other referred legislation) if the submitted petitions are legally insufficient. At the outset, his office could have "rejected [the petitions] as insufficient" as soon as they were submitted if they were not "submitted in accordance with this section, disregarding clerical and merely technical errors." § 116.100, RSMo. He remains empowered to "examine the petition to determine whether it complies with the Constitution of Missouri and with" the referendum statutes, including by "verify[ing] the signatures on the petition by use of random sampling of five percent of the signatures"; "[i]f the random sample verification establishes that the number of valid signatures is less than ninety percent of the number of qualified voters needed to find the petition sufficient in a congressional district, the petition shall be deemed to have failed to qualify in that district." § 116.120(1)–(2), RSMo. He "may send copies of petition pages to election authorities to verify that the persons whose names are listed as signers to the

petition are registered voters. Such verification may either be of each signature or by random sampling[.]” § 116.130(1), RSMo. He retains “authority not to count signatures on initiative or referendum petitions which are, in his opinion, forged or fraudulent signatures.” § 116.140, RSMo. And, *at any time*, “[i]f the secretary of state finds the petition insufficient, the secretary of state shall issue a certificate stating the reason for the insufficiency.” § 116.150(2), RSMo. The occurrence and timing of these safeguards are left to the Secretary of State’s discretion, and they serve as a check on the automatic suspension of referred legislation.³ But until they are invoked (and, of course, the process for judicial review is allowed to take its course, *see* MTD 18–19), referred legislation is suspended.

B. HB1 is now suspended as an operation of law.

Given this precedent, and the importance of preserving the People’s referendum power, HB1 is now suspended—full stop. As the Revisor reports, the Secretary of State’s office received 691 boxes of referendum petitions for HB1 on December 9, 2025. Ex. 7. Upon that submission, HB1 was “halted” as a matter of law. *Kemper*, 165 S.W. at 779. Nothing further is required to effectuate HB1’s

³ The Legislature also has a check: A referendum may *not* be ordered “as to laws necessary for the immediate preservation of the public peace, health or safety, and laws making appropriations for the current expenses of the state government, for the maintenance of state institutions and for the support of public schools.” Mo. Const. art. III, § 52(a); *see also id.* art. III, § 29 (provision that laws cannot take effect fewer than ninety days after legislative adjournment does not apply to appropriation acts or emergency legislation). HB1, for its part, does not implicate any of these exceptions.

suspension—not the Secretary of State’s issuance of a certificate of sufficiency under Section 116.150, RSMo, or anything else.

Notably, Attorney General Catherine Hanaway initially adopted this longstanding, commonsense position. In a federal-court complaint challenging the constitutionality of the HB1 referendum, she cited Article III, Section 52(b) of the Missouri Constitution to explain that, “[i]f a referendum petition gains enough signatures to qualify for a vote before the people, the challenged law is frozen pending the public vote. Thus, the General Assembly loses its authority over redistricting pending that public vote.” Complaint ¶ 48, *Mo. Gen. Assembly v. Von Glahn*, No. 4:25-cv-01535-ZMB (E.D. Mo. Oct. 15, 2025), ECF No. 1 (citation modified). The Missouri Director of Elections agreed in a sworn declaration. *See* Declaration of Chrissy Peters in Support of Plaintiffs’ Motion for a Preliminary Injunction ¶ 20, *Mo. Gen. Assembly*, No. 4:25-cv-01535-ZMB (E.D. Mo. Oct. 15, 2025), ECF No. 3-1 (“[I]f [referendum organizers] succeed in collecting the necessary signatures, the Missouri Constitution will prevent the new map from taking effect until a referendum occurs.”).

Although Secretary Hoskins has myriad tools to review the HB1 petitions for sufficiency and may find the referendum invalid at any time, *see supra* pp.11–12, this has not occurred. No certificate of insufficiency has issued; nor has 2026-R004 been otherwise deemed noncompliant. HB1 is therefore suspended.⁴

⁴ Plaintiffs’ underlying petition requested that use of HB1’s congressional map be enjoined “until voters approve or reject it through the constitutional

Defendants, however, are nevertheless treating HB1 as though it is in effect. *See, e.g.*, Ex. 11 (listing effective date of December 11, 2025, for statutes created and amended by HB1). This position is wrong as a matter of law, and Plaintiffs are therefore likely to succeed on their claim that Defendants are currently violating the Missouri Constitution.

II. Plaintiffs will suffer irreparable harm absent injunctive relief.

The equities further support Plaintiffs' request for injunctive relief.

Plaintiffs (and all Missouri voters) will suffer irreparable harm absent immediate judicial intervention because "being subject to an unconstitutional statute, for even minimal periods of time, unquestionably constitutes irreparable injury." *Rebman v. Parson*, 576 S.W.3d 605, 612 (Mo. banc 2019) (citation modified). Here, both Plaintiffs signed the petition to refer HB1 to the People for approval or rejection. Ex. 1 ¶5; Ex. 2 ¶5. Allowing HB1 to take effect notwithstanding this referral would "serve[] as an end run around the constitutionally protected right of the people of Missouri" to approve or reject legislation, denying them their constitutional prerogative and imposing a clear and

referendum process." Pet. for Declaratory J. & Injunctive Relief 9. Their use of the phrase "constitutional referendum process" naturally presupposed a *legally compliant* referendum process; Plaintiffs do not seek to enjoin HB1 indefinitely even if the 2026-R004 vote is foreclosed as a matter of law. Nor do they seek to prevent Secretary Hoskins from making a decision about certification. But since Defendants have misconstrued this nuance, *see* MTD 17–21, Plaintiffs offer this clarification and have amended their requested relief to reflect it, *see infra* p. 19.

irreparable injury. *Earth Island Inst. v. Union Elec. Co.*, 456 S.W.3d 27, 34 (Mo. banc 2015).

Moreover, HB1 has been prematurely codified, *see* Ex. 11, and Defendants have indicated their intent to use HB1's new congressional map in the upcoming elections, *see, e.g.*, Ex. 10 ("Republican Attorney General Catherine Hanaway issued a statement saying the new House districts took effect Tuesday and will remain in place unless Hoskins determines the referendum petition is constitutional and contains sufficient signatures."). Although this statement from Attorney General Hanaway left open the possibility that HB1 could be suspended after Secretary Hoskins issues a certificate of sufficiency, Secretary Hoskins has until *August* to do so, *see* § 116.150(1), RSMo, and has stated publicly that the certification process will likely take "a significant amount of time," Ex. 15 (Alisa Nelson, *When Does Missouri's New Congressional Map Take Effect? That Depends on Who You Ask*, MissouriNet (Dec. 10, 2025), <https://bit.ly/4apTGwH>).⁵

⁵ Defendants suggest that "Plaintiffs never explain why delay would affect their ability to vote on a referendum of HB1 before the HB1 maps govern a congressional election." MTD 17. Here is an explanation: Secretary Hoskins has until August 4, 2026, to complete the sufficiency-review process under § 116.150, RSMo—the *same day* as the 2026 primary election. *See* MTD 13 & n.8. A prolonged verification process is hardly unthinkable, as Secretary Hoskins has "promised a 'slow and steady' review of the signatures" and told the Associated Press he would "do everything [he] can to protect . . . the map the General Assembly passed." Ex. 10. And just one week ago Attorney General Hanaway echoed this sentiment while relying on her (erroneous) opinion that HB1 is currently in effect: "As long as the status quo is the new map[,], delay works in our favor." *Missouri Attorney General, Catherine Hanaway - Live at the Capitol*, at 07:20, NewsTalkSTL (Jan. 7, 2026), <https://bit.ly/4qU6ws7>.

But time is of the essence: The filing period for congressional candidates begins on February 24, 2026, *see* § 115.349(2), RSMo, meaning the contours of Missouri’s operative congressional map must be clarified—and Defendants’ erroneous interpretation of the referendum laws must be corrected—*as soon as possible*. Otherwise, the People’s referendum rights will be subject to another legal impediment: “the *Purcell* principle,” which “requires courts to favor the status quo in a legal dispute during the lead-up to an election.” MTD 17 (footnote omitted) (citing *Purcell v. Gonazalez*, 549 U.S. 1 (2006) (per curiam)).

Simply put, by the time Secretary Hoskins finishes his review, it could be too late to revert to Missouri’s prior 2022 congressional map—meaning that HB1’s new map will be used in the 2026 midterms. And given that HB1 is suspended pursuant to the People’s referendum rights, use of the HB1 map before a valid referendum vote occurs would violate the Missouri Constitution. As soon as an election occurs under HB1’s (legally suspended) congressional map, irreparable harm will be imposed because “there can be no do-over and no redress. The injury to [] voters is real and completely irreparable if nothing is done to enjoin” an unconstitutional map. *League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4th Cir. 2014).

Clearly, no “monetary remedies can[] provide adequate compensation for [such] improper conduct.” *Glenn v. City of Grant City*, 69 S.W.3d 126, 130 (Mo. App. W.D. 2002) (citation modified). Plaintiffs will therefore be irreparably harmed absent immediate injunctive relief. And because Plaintiffs have “shown a

likely violation” of fundamental rights, “the other requirements for obtaining a preliminary injunction are generally deemed to have been satisfied.” *Willson v. City of Bel-Nor*, 924 F.3d 995, 999 (8th Cir. 2019) (citation modified).⁶

III. The balance of harms and public interest support injunctive relief.

The balance of harms and public interest merge when the government is the nonmoving party, *see Ass’n for Accessible Meds. v. Ellison*, 140 F.4th 957, 961 (8th Cir. 2025), and here, both factors weigh strongly in favor of immediate relief.

The government has charted an unconstitutional course: implementing HB1’s new congressional map for the upcoming midterm elections notwithstanding the legislation’s suspension. Enjoining this unlawful conduct will impose no injury on Defendants because “a state is in no way harmed by issuance of a preliminary injunction which prevents the state from enforcing [laws] likely to be found unconstitutional.” *Giovani Carandola, Ltd. v. Bason*, 303 F.3d 507, 521 (4th Cir. 2002) (citation modified); *see also, e.g., United States v. Alabama*, 691 F.3d 1269, 1301 (11th Cir. 2012) (“[W]e discern no harm from the state’s nonenforcement of invalid legislation.”). In contrast, it is “always in the public interest to protect constitutional rights,” *Ass’n for Accessible Meds.*, 140 F.4th at 961 (citation modified), and, given that Plaintiffs are likely to succeed on the merits, injunctive relief will preserve Plaintiffs’ and all Missourians’ referendum

⁶ Missouri courts “rel[y] on federal law . . . in setting forth the standard for issuing preliminary injunctive relief.” *Comprehensive Health*, 2025 WL 2346611, at *2.

and voting rights, see *Phelps-Roper v. Nixon*, 545 F.3d 685, 690 (8th Cir. 2008) (where constitutional rights are concerned, “the determination of where the public interest lies [] is dependent on the determination of the likelihood of success on the merits”), *overruled on other grounds*, *Phelps-Roper v. City of Manchester*, 697 F.3d 678 (8th Cir. 2012).

IV. The Court should advance and consolidate trial on the merits with the preliminary-injunction hearing.

Finally, the Court should advance and consolidate trial on the merits with the preliminary-injunction hearing under Rule 92.02(c)(3), Mo. S. Ct. R., which provides that “[a]t any time the Court may order the trial of the action on the merits to be advanced and consolidated with the hearing of the application for a preliminary injunction.”

The Court may order consolidation “for whatever reason the judge may find suitable.” *Est. of Hutchison v. Massood*, 494 S.W.3d 595, 605 (Mo. App. W.D. 2016) (quoting *State ex rel. Cohen v. Riley*, 994 S.W.2d 546, 550 (Mo. banc 1999) (Wolff, J., concurring)). “An order accelerating the trial on the merits and consolidating it with the preliminary injunction hearing must be clear and unambiguous,” *Cohen*, 994 S.W.2d at 548, and “must be given in sufficient time to afford a litigant a reasonable opportunity to marshal, and present, its evidence,” *Hutchison*, 494 S.W.3d at 602 (citation modified). “Such a ruling may occur before or, conceivably, after the beginning of, the preliminary hearing,” but it must be “made *explicitly*.” *Id.* at 605 (citation modified).

Here, expedited resolution on the merits is readily justified. This case presents a purely legal question that can be fully adjudicated using judicially noticeable facts.⁷ No further factual determination is required—meaning no discovery, evidentiary development, or delay is needed to facilitate a merits ruling. Advancing and consolidating trial on the merits with the preliminary-injunction hearing will thus promote judicial economy by resolving the predicate legal question of HB1’s suspension in one stroke. Final resolution of this legal question in an expedited manner will also allow the Court to enter permanent injunctive relief and judgment quickly, which is necessary given the time-sensitive nature of this proceeding (the upcoming candidate-filing period in particular, *see supra* pp.15–16) and the potential for appellate review.

CONCLUSION

For these reasons, Plaintiffs are entitled to a preliminary injunction. They respectfully request that the Court grant this motion and issue an order preliminarily enjoining Defendants, including their officers, agents, servants, employees, attorneys, and all those persons in active concert or participation with them, from using HB1’s congressional map until voters approve or reject it through the constitutional referendum process (or the referendum is finally ruled noncompliant or otherwise invalid).

⁷ While this motion cites news articles for context and to satisfy the equitable factors for preliminary injunctive relief, the merits of Plaintiffs’ sole claim can be adjudicated using only caselaw and government documents—all amenable to judicial notice. *See supra* note 1.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2026, a true and correct copy of the above was filed with the Court's electronic filing system to be served by electronic methods on counsel for all parties entered in the case.

s/ Tori Schafer
Attorney for Plaintiffs

Stipulated Exhibit 27

No. SC101412

**In the
Supreme Court of Missouri**

MERRIE SUZANNE LUTHER, *et al.*,

Appellants,

v.

SECRETARY OF STATE DENNY HOSKINS, *et al.*,

Respondents.

Appeal from the Circuit Court of Cole County
The Honorable Christopher K. Limbaugh

BRIEF OF RESPONDENT DENNY HOSKINS

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TABLE OF CONTENTS

TABLE OF CONTENTS	2
TABLE OF AUTHORITIES	4
INTRODUCTION	12
STATEMENT OF FACTS.....	13
SUMMARY OF ARGUMENT	17
STANDARD OF REVIEW	21
ARGUMENT	22
I. THE CIRCUIT COURT DID NOT ERR IN HOLDING THE GENERAL ASSEMBLY HAD AUTHORITY TO ENACT HOUSE BILL 1, BECAUSE THE MISSOURI CONSTITUTION IMPOSES NO TEMPORAL RESTRICTIONS ON THE LEGISLATURE’S CONGRESSIONAL REDISTRICTING POWER, IN THAT NEITHER ARTICLE III, SECTION 45 NOR ANY OTHER PART OF THE MISSOURI CONSTITUTION IMPOSES LIMITATIONS ON WHEN THE GENERAL ASSEMBLY MAY EXERCISE ITS PREROGATIVE TO ENACT CONGRESSIONAL REDISTRICTING LEGISLATION PURSUANT TO ITS RESPONSIBILITIES UNDER § 45 AND UNDER ARTICLE I, § 4 OF THE U.S. CONSTITUTION (RESPONSE TO POINTS RELIED ON I).....	22
A. The Missouri Constitution’s plain text and plenary power doctrine demonstrate the General Assembly’s plenary redistricting authority.....	22
B. History confirms the framers did not intend to bar mid-decade redistricting.....	25
C. Constitutional structure reinforces the General Assembly’s plenary redistricting authority.	29
D. Precedent bolsters the General Assembly’s plenary redistricting authority.....	31
E. Out-of-state precedent supports the General Assembly’s plenary redistricting authority.	32
F. Appellants and Amici’s counterarguments fail.....	34

1. Appellants fail to negate the plenary power rule by analogizing the General Assembly to commissions of limited powers.....	35
2. Appellants misunderstand and misapply the negative-implication canon.....	36
3. Appellants distort this Court’s precedents.....	38
4. Appellants and Amici misunderstand the history.....	46
5. Appellants’ out-of-state precedents are unpersuasive.....	49
II. UNDER THE PURCELL PRINCIPLE, THIS COURT SHOULD NOT VOID THE 2025 MAP FOR THE UPCOMING ELECTION.....	54
CONCLUSION	59
CERTIFICATE OF COMPLIANCE	61
CERTIFICATE OF SERVICE	62

TABLE OF AUTHORITIES

Cases	Page(s)
<i>Abbott v. League of United Latin Am. Citizens</i> , 146 S. Ct. 418 (2025)	Passim
<i>Abbott v. Mexican Am. Legis. Caucus</i> , 647 S.W.3d 681 (Tex. 2022)	24, 34
<i>Alliance for Retired Americans v. Secretary of State</i> , 240 A.3d 45 (Maine 2020)	56
<i>Bd. of Educ. of City of St. Louis v. City of St. Louis</i> , 879 S.W.2d 530 (Mo. banc 1994)	23
<i>Blaske v. Smith & Entzeroth, Inc.</i> , 821 S.W.2d 822 (Mo. banc 1991)	Passim
<i>Blum v. Schrader</i> , 637 S.E.2d 396 (Ga. 2006)	34
<i>Brooks v. State</i> , 128 S.W.3d 844 (Mo. banc 2004)	29
<i>Brown v. Morris</i> , 290 S.W.2d 160 (Mo. banc 1956)	23
<i>Bush v. Gore</i> , 531 U.S. 98 (2000)	23
<i>C.S. v. Mo. State Hwy. Patrol Crim. Just. Info. Serv.</i> , 716 S.W.3d 264 (Mo. banc 2025)	37
<i>Chi. Bar Ass’n v. White</i> , 898 N.E.2d 1101 (Ill. App. Ct. 2008)	56
<i>Citizens’ National Bank of Kansas City v. Graham</i> , 48 S.W. 910 (Mo. banc 1898)	44

<i>City of Columbia v. Henderson</i> , 399 S.W.3d 493 (Mo. App. W.D. 2013)	46
<i>City of Normandy v. Greitens</i> , 518 S.W.3d 183 (Mo. banc 2017)	21
<i>Conservation Commission v. Bailey</i> , 669 S.W.3d 61 (Mo. banc 2023)	41, 42, 43
<i>Craft v. Philip Morris Companies, Inc.</i> , 190 S.W.3d 368 (Mo. App. E.D. 2005)	32, 54
<i>Democratic National Committee v. Wisconsin State Legislature</i> , 141 S. Ct. 28 (2020)	55
<i>Denney v. State ex rel. Basler</i> , 42 N.E. 929 (Ind. 1896)	49
<i>Fay v. Merrill</i> , 256 A.3d 622 (Conn. 2021)	57
<i>Frasher v. Spradling</i> , 743 S.W.2d 109 (Mo. App. W.D. 1988)	37
<i>Gross v. Parson</i> , 624 S.W.3d 877 (Mo. banc 2021)	37
<i>Grove v. Emison</i> , 507 U.S. 25 (1993)	24
<i>Guyer v. City of Kirkwood</i> , 38 S.W.3d 412 (Mo. banc 2001)	21
<i>Harrell v. Total Health Care, Inc.</i> , 781 S.W.2d 58 (Mo. banc. 1989)	17, 23
<i>Harris v. Hardeman</i> , 55 U.S. 334 (1852)	48
<i>Harris v. Shanahan</i> , 387 P.2d 771 (Kan. 1963)	50

<i>Henderson v. Koenig</i> , 68 S.W. 72 (Mo. banc 1902)	43, 44
<i>In re Below</i> , 855 A.2d 459 (N.H. 2004).....	50
<i>In re Beyersdorfer</i> , 59 S.W.3d 523 (Mo. banc 2001)	39
<i>In re Certification of a Question of Law from U.S. District. Court, District of South Dakota, Western Division</i> , 615 N.W.2d 590 (S.D. 2000).....	50, 51, 52
<i>In re Opinion of the Judges</i> , 246 N.W. 295 (S.D. 1933).....	52
<i>Jantz v. Brewer</i> , 30 S.W.3d 915 (Mo. App. S.D. 2000)	31
<i>Kane v. Kundert</i> , 371 N.W.2d 172 (S.D. 1985).....	52
<i>Koons Buick Pontiac GMC, Inc. v. Nigh</i> , 543 U.S. 50 (2004)	27
<i>Lamson v. Sec’y of Commonwealth</i> , 168 N.E.2d 480 (Mass. 1960).....	50
<i>League of United Latin Am. Citizens v. Abbott</i> , 3d ---, EP-21-CV-00259-DCG-JES-JVB, 2025 WL 3215715 (W.D. Tex. Nov. 18, 2025)	60
<i>League of United Latin Am. Citizens v. Perry</i> , 548 U.S. 399 (2006)	24, 25
<i>Legislature v. Deukmejian</i> , 669 P.2d 17 (Cal. 1983).....	53
<i>Liberty Oil Co. v. Dir. of Revenue</i> , 813 S.W.2d 296 (Mo. banc 1991)	12, 16, 23

<i>Liddy v. Lamone</i> , 919 A.2d 1276 (Md. 2007)	56
<i>McGrew v. Mo. Pac. Ry. Co.</i> , 230 Mo. 496, 132 S.W. 1076 (Mo. banc 1910)	50
<i>Merrill v. Milligan</i> , 142 S. Ct. 879 (Mem.).....	55, 58
<i>Moore v. Harper</i> , 600 U.S. 1 (2023)	23
<i>Moore v. Lee</i> , 644 S.W.3d 59 (Tenn. 2022)	56
<i>Mumme v. Mars</i> , 40 S.W.2d 31 (Tex. 1931)	24, 33
<i>Opinion of the Justices</i> , 47 So. 2d 714 (Ala. 1950)	50
<i>PDQ Tower Servs., Inc. v. Adams</i> , 213 S.W.3d 697 (Mo. App. W.D. 2007)	46
<i>Pearson v. Koster</i> , 359 S.W.3d 35 (Mo. banc 2012)	Passim
<i>Pender County v. Bartlett</i> , 649 S.E.2d 364 (N.C. 2007).....	56
<i>Penzel Construction Co., Inc. v. Jackson R-2 Sch. Dist.</i> , 544 S.W.3d 214 (Mo. App. E.D. 2017)	32, 52, 53
<i>People ex rel. Mooney v. Hutchinson</i> , 50 N.E. 599 (Ill. 1898).....	49, 50
<i>People ex rel. Salazar v. Davidson</i> , 79 P.3d 1221 (Colo. 2003)	48, 49, 50, 53

<i>Pestka v. State</i> , 493 S.W.3d 405 (Mo. banc 2016)	38, 39, 40, 43
<i>Pippins v. City of St. Louis</i> , 823 S.W.2d 131 (Mo. App. E.D. 1992)	36
<i>Preisler v. Doherty</i> , 284 S.W.2d 427 (Mo. banc 1955)	35, 36
<i>Preisler v. Sec’y of State</i> , (<i>Preisler I</i>), 238 F. Supp. 187 (W.D. Mo. 1965)	27, 28
<i>Preisler v. Sec’y of State</i> , (<i>Preisler II</i>), 257 F. Supp. 953 (W.D. Mo. 1966)	28
<i>Preisler v. Sec’y of State</i> , (<i>Preisler III</i>), 279 F. Supp. 952 (W.D. Mo. 1967)	28
<i>Preisler v. Sec’y of State</i> , (<i>Preisler IV</i>), 341 F. Supp. 1158 (W.D. Mo. 1972)	28
<i>Purcell v. Gonzalez</i> , 549 U.S. 1 (2006)	Passim
<i>Rebman v. Parson</i> , 576 S.W.3d 605 (Mo. banc 2019)	21, 42, 43
<i>Republican Nat’l Comm. v. Democratic Nat’l Comm.</i> , 589 U.S. 423 (2020)	20
<i>Reynolds v. Sims</i> , 377 U.S. 533 (1964)	55, 59
<i>Riley v. Kennedy</i> , 553 U.S. 406 (2008)	55
<i>Russello v. United States</i> , 464 U.S. 16 (1983)	30, 31
<i>Selleck v. Keith M. Evans Ins., Inc.</i> , 535 S.W.3d 779 (Mo. App. E.D. 2017)	31

<i>Six Flags Theme Parks, Inc. v. Dir. of Revenue</i> , 179 S.W.3d 266 (Mo. banc 2005)	18, 36, 37, 43, 45
<i>Springfield City Water Co. v. City of Springfield</i> , 182 S.W.2d 613 (Mo. 1944)	18, 36, 37
<i>State ex rel. City of St. Louis v. Seibert</i> , 27 S.W. 624 (Mo. banc 1894)	45, 46
<i>State ex rel. Ellis v. Creech</i> , 259 S.W.2d 372 (Mo. banc 1953)	54
<i>State ex rel. Gordon v. Becker</i> , 49 S.W.2d 146 (Mo. banc 1932)	35, 44, 45
<i>State ex rel. Major v. Patterson</i> , 129 S.W. 888 (Mo. 1910)	39
<i>State ex rel. Mathewson v. Bd. of Election Comm’ners of St. Louis Cnty.</i> , 841 S.W.2d 633 (Mo. banc 1992)	16
<i>State ex rel. Meighen v. Weatherill</i> , 147 N.W. 105 (Minn. 1914)	19, 32, 33
<i>State ex rel. Ohio Democratic Party v. LaRose</i> , 257 N.E.3d 130 (Ohio 2024)	57
<i>State ex rel. Thomson v. Zimmerman</i> , 60 N.W.2d 416 (Wis. 1953)	50
<i>State on inf. Huffman v. Sho-Me Power Co-op.</i> , 191 S.W.2d 971 (Mo. banc 1946)	46
<i>State v. Clay</i> , 481 S.W.3d 531 (Mo. banc 2016)	12
<i>State v. Hamey</i> , 65 S.W. 946 (Mo. 1902)	43

<i>State v. Shelby</i> , 64 S.W.2d 269 (Mo. banc 1933)	35
<i>State ex rel. Teichman v. Carnahan</i> , 357 S.W.3d 601 (Mo. banc 2012)	35, 36
<i>Thompson v. Comm. on Legislative Research</i> , 932 S.W.2d 392 (Mo. banc 1996)	35, 36
<i>Three Rivers Junior Coll. Dist. of Poplar Bluff v. Statler</i> , 421 S.W.2d 235 (Mo. banc 1967)	31
<i>Tinnin v. Modot & Patrol Employees' Retirement System</i> , 647 S.W.3d 26 (Mo. App. W.D. 2022)	37
Statutes	
2 U.S.C. § 2a(a)–(b)	47
13 U.S.C. § 141(a)–(b)	47
Article III, § 7 of the 1875 Constitution.....	44, 45
Article III, § 28 of the Texas Constitution.....	24, 34
Article III, § 32 of the Missouri Constitution	38, 39, 40
Article III, § 45 of the Missouri Constitution	Passim
Article III, § 36 of the Missouri Constitution	46
Article III, § 37 of the Missouri Constitution	29
Article IV, § 43 of the Missouri Constitution (1875).....	46
Cal. Const. art. XXI, §1 (1879, as amended 1980)	53
S.D. Const. art. III, § 5	51, 52
S.D. Const. art. III, § 5 (1889)	52

U.S. Const. art. I, § 4, cl. 1.....	2, 17, 22, 24
§ 115.349, RSMo.....	55

Rules

Missouri Supreme Court Rule 84.06(b)	63
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Other Authorities

<i>Data Archive: Elections: 2024</i> , UCSB: The American Presidency Project (Dec. 31, 2024)	14, 15
Erik J. Engstrom, <i>Stacking the States, Stacking the House: The Partisan Consequences of Congressional Redistricting in the 19th Century</i> , 100 AM. POL. SCI. REV. 419, 421 (Aug. 2006).....	26
ERIK J. ENGSTROM, PARTISAN GERRYMANDERING AND THE CONSTRUCTION OF AMERICAN DEMOCRACY 76 (2013).....	26
File No. 21, Report No. 1 of Committee No. 23 on Phraseology, Arrangement and Engrossment, Article IV, Legislative Department, Congressional, State Senatorial and Representative Districts at 22–24 (September 19, 1944)	27
<i>Gerrymandering Project, Redistricting Report Card: California 2025</i> Congressional – Draft – AB604, Gerrymandering Project (Sept. 4, 2025) ..	14
H.B. 1	2, 13, 14, 15, 17, 22
<i>Proceedings of the Legislature Yesterday</i> , THE KANSAS CITY JOURNAL (Jan. 20, 1877)	25
<i>Re-Districting the State</i> , THE SEDALIA WEEKLY EAGLE (Jan. 26, 1877)	25
<i>Twenty-Ninth General Assembly</i> , THE SPRINGFIELD LEADER (Jan. 25, 1877)	25
<i>Virginia Democrats unveil a redistricting map that would aim to give them 4 more US House seats</i> , CNN (Feb. 6, 2026).....	14

INTRODUCTION

This case is legally straightforward. Under the Missouri Constitution, “the General Assembly has the power to do whatever is necessary to perform its functions *except as expressly restrained* by the Constitution.” *State v. Clay*, 481 S.W.3d 531, 537 (Mo. banc 2016) (quoting *Liberty Oil Co. v. Dir. of Revenue*, 813 S.W.2d 296, 297 (Mo. banc 1991)) (emphasis in *Clay*). As the Circuit Court rightly recognized, Article III, § 45 of the Missouri Constitution says *nothing* about mid-decade redistricting. D19: P4. If the framers of the 1945 Missouri Constitution wanted to prohibit mid-decade redistricting—a practice that had previously occurred in Missouri—they would have said so. Like the Circuit Court, this Court should reject Appellants’ invitation to fabricate a nonexistent and ahistorical temporal restriction on the General Assembly’s power to redistrict when it deems necessary.

The Court should affirm.

STATEMENT OF FACTS

On September 12, 2025, the Missouri General Assembly enacted House Bill 1 (2025) (“H.B. 1”). D4: P2 ¶ 10. H.B. 1 establishes new congressional districts and repeals the previous congressional map adopted in 2022. Governor Mike Kehoe signed H.B. 1 into law on September 28. D4: P2 ¶ 12.

Appellants assert—without citation—that H.B. 1 was enacted “in response to entreaties from the President of the United States.” Appellants’ Br. at 8. Although the General Assembly’s motivations in enacting—and Governor Kehoe’s reasons for signing—H.B.1 are not at issue in this case, those reasons are more nuanced than Appellants suggest. Among other reasons, the General Assembly enacted H.B. 1 to ensure Missouri’s political majority had fair representation in the federal government. See Governor Kehoe, Proclamation: Governor Kehoe Convenes the Second Extraordinary Session of the First Regular Session of the One Hundred Third General Assembly (Aug. 29, 2025).

In particular, the General Assembly and Governor acted in response to aggressive redistricting efforts in other States. See *Abbott v. League of United Latin Am. Citizens*, 146 S. Ct. 418, 419 (2025) (“With an eye on the upcoming 2026 midterm elections, several States have in recent months redrawn their congressional districts in ways that are predicted to favor the State’s dominant political party.”). In particular, Missouri’s redistricting effort followed that in

California, where Republicans are now expected to hold only four out of 52 seats—despite the Republican presidential candidate winning almost forty percent of the vote in the 2024 general election. *See* Gerrymandering Project, Redistricting Report Card: California 2025 Congressional – Draft – AB604, Gerrymandering Project (Sept. 4, 2025);¹ *see also* Assem. Bill 604, 2025–2026 Reg. Sess. (Cal. 2025) (approved by Governor Aug. 21, 2025). Even under H.B. 1, Republicans are expected to win a smaller percentage of seats than Democrat majorities hold in other States, including Illinois, Virginia, and all the New England states.² For example, 43.47 percent of Illinois voters cast their votes for President Trump in 2024, *see id.*, but only three out of 17 U.S. House members from Illinois are Republicans, or 17.65 percent. And under the redistricting plan being pushed in Virginia, just one out of 11 house seats, or 9 percent, is projected to be held by a Republican despite President Trump winning 46.05% of the vote in 2024. *Id.*; *see Virginia Democrats unveil a redistricting map that would aim to give them 4 more US House seats*, CNN (Feb. 6, 2026).³ Looking at the percentage vote for Trump in 2024, Connecticut (41.89%), Maine (45.50%), Massachusetts (36.02%), New Hampshire (47.87%),

¹ <https://perma.cc/DCD2-5Z8T>

² *See Data Archive: Elections: 2024*, UCSB: The American Presidency Project (Dec. 31, 2024), <https://perma.cc/AE34-RZ7H>; *Directory of Representatives*, U.S. House of Representatives (2025), <https://www.house.gov/representatives>.

³ <https://perma.cc/WQR2-8QWW>.

Rhode Island (41.76%), and Vermont (32.32%), *none* of these States send a single Republican to the U.S. House of Representatives.⁴

On September 12, 2025, Appellants filed a petition in the Circuit Court of Cole County seeking declaratory judgment and injunctive relief against the enactment of H.B. 1. *See* D2: P7. Appellants alleged that H.B. 1 violated Article III, § 45 of the Missouri Constitution because it enacted new congressional districts greater than once per decade. *See* D2: P5–6 ¶¶ 34–44. Their petition asked the Circuit Court to “[d]eclare House Bill 1 in violation of Article III, Section 45” of the Missouri Constitution and “[e]njoin the Secretary of State . . . from using the map enacted by House Bill 1 to conduct any congressional election.” D2: P7 ¶ 49(a)-(b). The Circuit Court subsequently allowed Missouri Republican State Conference to intervene in support of H.B. 1. *See* D7.

Following a trial on stipulated facts, the Circuit Court rejected Appellants’ claim. The Circuit Court confirmed that the General Assembly’s “plenary authority” included the power to conduct mid-decade congressional redistricting. D19: P6. The Circuit Court rooted this holding in the longstanding principle that “[t]he Constitution is not a grant but a restriction

⁴ *See Data Archive: Elections: 2024*, UCSB: The American Presidency Project (Dec. 31, 2024), <https://perma.cc/AE34-RZ7H>; *Directory of Representatives*, U.S. House of Representatives (2025), <https://www.house.gov/representatives>.

upon the powers of the legislature.” D19: P3 (quoting *Liberty Oil*, 813 S.W.2d at 297). “[W]here the constitution is silent, the legislature may properly address the issue.” D19: P4 (quoting *State ex rel. Mathewson v. Bd. of Election Comm’ns of St. Louis Cnty.*, 841 S.W.2d 633, 636 (Mo. banc 1992)). Beyond the plain text and plenary power, the Circuit Court found that constitutional structure bolstered the General Assembly’s exercise of its redistricting prerogative. D19: P4–5 (contrasting § 45’s language against provisions of the Constitution which feature explicit prohibitory language).

The Circuit Court also rejected Appellants’ various arguments. It faulted Appellants for relying on out-of-context “dicta” from *Pearson v. Koster*, 359 S.W.3d 35 (Mo. banc 2012). See D19: P5. The Circuit Court also refused to transpose state legislative redistricting restrictions into § 45’s text. D19: P6 (“In any event, the implication raised by plaintiff is not enough to conclude that the inclusion of this language in Section 14 serves as a bar for the legislature to conduct a second redistricting pursuant to Section 45.”).

This appeal follows.

SUMMARY OF ARGUMENT

The Circuit Court correctly rejected Appellants’ constitutional challenge to the General Assembly’s authority to enact H.B. 1. It properly distinguished between the constitutional duty of the General Assembly to redistrict *at least* once per decade and the plenary legislative authority of the General Assembly to draw Missouri’s congressional districts as it sees fit—subject to the compactness, contiguity, and population equality requirements of § 45 and federal law. *See Pearson*, 359 S.W.3d at 38.

First, the General Assembly has discretion to conduct mid-decade redistricting under its plenary legislative authority and the U.S. Constitution’s Elections Clause. U.S. Const. art. I, § 4, cl. 1 (“The Times, Places and Manner of holding Elections for Senators and Representatives, shall be prescribed in each State by the Legislature thereof . . .”). Under longstanding precedent, the General Assembly retains inherent authority to redistrict when it chooses unless Appellants identify “express” constitutional language prohibiting mid-decade redistricting. *See Blaske v. Smith & Entzeroth, Inc.*, 821 S.W.2d 822, 835 (Mo. banc 1991) (quoting *Harrell v. Total Health Care, Inc.*, 781 S.W.2d 58, 63–64 (Mo. banc. 1989)). Section 45’s plain text lacks such language. Furthermore, its language does not, by implication, divest the General Assembly of its mid-decade redistricting power either.

Second, Missouri history and practice bolster this straightforward reading of § 45. Historical context demonstrates that the 1943–1944 Constitutional Convention enacted § 45 to mandate redistricting *at least* once per decade—because the General Assembly had failed to redistrict at all in the prior decades. By contrast, no evidence shows that the 1943–1944 Constitutional Convention delegates were concerned about mid-decade redistricting—even though they knew the General Assembly had previously redistricted mid-decade. And even after § 45’s ratification, federal courts recognized that the General Assembly could redistrict mid-decade, permitting it to do so again and again following adverse rulings against enacted maps.

Third, constitutional structure buttresses the General Assembly’s redistricting power. When the Missouri Constitution prohibits a legislative action, it says so. Even in the rare circumstances where the General Assembly is prohibited from action by implication, the restriction on plenary power “should be invoked only when it would be natural to assume by a *strong contrast* that that which is omitted must have been intended for the opposite treatment.” *Six Flags Theme Parks, Inc. v. Dir. of Revenue*, 179 S.W.3d 266, 270 (Mo. banc 2005) (quoting *Springfield City Water Co. v. City of Springfield*, 182 S.W.2d 613, 618 (Mo. 1944)) (emphasis added). No such “strong contrast” exists in § 45.

Fourth, binding and persuasive precedents support the General Assembly's redistricting power. This Court expressly confirmed that the General Assembly retains the power—in the absence of “express” constitutional prohibitions—to act with complete discretion, *Blaske*, 821 S.W.2d at 835, including realigning legislative districts. And in *Pearson v. Koster*, this Court identified only three limits on the General Assembly's federal redistricting power in § 45: contiguity, compactness, and equality of population. 359 S.W.3d at 38. A temporal limitation was not one of those three limits. *See id.* Additionally, out-of-state precedent interpreting similar state provisions confirms that, in the absence of a clear constitutional prohibition, state legislatures enjoy the power to redistrict mid-decade at will. *See, e.g., State ex rel. Meighen v. Weatherill*, 147 N.W. 105, 106 (Minn. 1914) (upholding the Minnesota Legislature's discretionary mid-decade redistricting power).

Despite this weight of authority, Appellants and Amici attempt several counterarguments. These are unpersuasive.

First, Appellants try (and fail) to negate the governing plenary power rule by falsely analogizing the General Assembly to commissions of limited powers. *Second*, Appellants and Amici mangle the negative-implication canon, reading nonexistent language into § 45. *Third*, Appellants and Amici garble precedents, drawing incorrect analogies between separation-of-powers and appropriations cases to divest the General Assembly of a power fully vested in

the General Assembly. *Fourth*, they either ignore or misconstrue the key constitutional history supporting the General Assembly's authority. *Fifth*, Appellants and Amici invoke out-of-state precedents that analyze materially different state constitutional texts and rely on premises this Court has long rejected.

Finally, even if the Court contemplates Appellants' arguments, it should not invalidate the 2025 Map in anticipation of the imminent deadlines for the 2026 midterm elections. The *Purcell* principle prohibits courts from altering election rules during election seasons—because doing so would cause chaos and be inequitable. See *Purcell v. Gonzalez*, 549 U.S. 1 (2006) (per curiam); *Republican Nat'l Comm. v. Democratic Nat'l Comm.*, 589 U.S. 423, 424 (2020) (per curiam). With the filing period imminent, any court order against Missouri's federal congressional map should not apply until after the 2026 elections. See *Abbott*, 146 S. Ct. at 419 (applying *Purcell* and prohibiting alterations to Texas's congressional map for 2026 elections under nearly identical timing circumstances).

For all these reasons, this Court should affirm.

STANDARD OF REVIEW

“When reviewing a declaratory judgment, an appellate court’s standard of review is the same as in any other court-tried case.” *Rebman v. Parson*, 576 S.W.3d 605, 608 (Mo. banc 2019) (quoting *Guyer v. City of Kirkwood*, 38 S.W.3d 412, 413 (Mo. banc 2001)). “[T]he trial court’s decision should be affirmed unless there is no substantial evidence to support it, unless it is against the weight of the evidence, unless it erroneously declares the law, or unless it erroneously applies the law.” *Id.* (alteration in original). “Challenges to a statute’s constitutional validity are questions of law, which this Court reviews *de novo*.” *Id.* (quoting *City of Normandy v. Greitens*, 518 S.W.3d 183, 190 (Mo. banc 2017)).

ARGUMENT

- I. **The Circuit Court did not err in holding the General Assembly had authority to enact House Bill 1, because the Missouri Constitution imposes no temporal restrictions on the Legislature’s congressional redistricting power, in that neither Article III, Section 45 nor any other part of the Missouri Constitution imposes limitations on when the General Assembly may exercise its prerogative to enact congressional redistricting legislation pursuant to its responsibilities under § 45 and under Article I, § 4 of the U.S. Constitution (Response to Points Relied On I).**
 - A. **The Missouri Constitution’s plain text and plenary power doctrine demonstrate the General Assembly’s plenary redistricting authority.**

Article III, § 45 of the Missouri Constitution states:

When the number of representatives to which the state is entitled in the House of the Congress of the United States under the census of 1950 and each census thereafter is certified to the governor, the general assembly shall by law divide the state into districts corresponding with the number of representatives to which it is entitled, which districts shall be composed of contiguous territory as compact and as nearly equal in population as may be.

The plain text of § 45 mandates redistricting after the Census, but it says *nothing* about the possibility of additional mid-decade redistricting. *See* D19: P3–4. It says only that the General Assembly “shall” redistrict *at least once* per decade—following the decennial census. As explained further below, this command makes perfect sense in light of the General Assembly’s failure to enact a redistricting plan during the early twentieth century. *See infra* Section I.B.

The Missouri Constitution's silence on mid-decade redistricting is dispositive under the plenary power doctrine. "The general assembly's authority is plenary, except when *express* constitutional provisions intervene." *Blaske*, 821 S.W.2d at 835 (emphasis added) (quoting *Harrell*, 781 S.W.2d at 63–64). Even if Appellants could point to *any* relevant language limiting legislative power, "[a]ny constitutional limitation . . . must be strictly construed in favor of the power of the General Assembly." *Bd. of Educ. of City of St. Louis v. City of St. Louis*, 879 S.W.2d 530, 533 (Mo. banc 1994) (citing *Brown v. Morris*, 290 S.W.2d 160, 166 (Mo. banc 1956)) (emphasis added). This rule exists because "[d]eference due the General Assembly requires that doubt be resolved against nullifying its action if it is possible to do so by any reasonable construction of that action or by any reasonable construction of the Constitution." *Liberty Oil*, 813 S.W.2d at 297. Here, no such provisions "intervene," *Blaske*, 821 S.W.2d at 835, and so the General Assembly retains the power to redistrict mid-decade.⁵

Beyond the plenary power doctrine, the General Assembly also draws mid-decade redistricting authority from the U.S. Constitution's Elections

⁵ Any holding that the Missouri Constitution prohibits mid-decade redistricting would "impermissibly distort[]" state law in violation of the U.S. Constitution's Elections Clause. *Moore v. Harper*, 600 U.S. 1, 36 (2023) (quoting *Bush v. Gore*, 531 U.S. 98, 115 (2000) (Rehnquist, C.J., concurring)). The State respectfully preserves that argument.

Clause. See U.S. Const. art. I, § 4 (“The Times, Places and Manner of holding Elections for Senators and Representatives, shall be prescribed in each State by the Legislature thereof . . .”). This language “leaves with the States primary responsibility for apportionment of their federal congressional . . . districts.” *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 414 (2006) [hereinafter *LULAC*] (plurality opinion) (quoting *Grove v. Emison*, 507 U.S. 25, 34 (1993)). As the U.S. Supreme Court has made clear, “[w]ith respect to a mid-decade redistricting to change districts drawn earlier in conformance with a decennial census, the Constitution and Congress state no explicit prohibition.” *Id.* at 415. That is why—even before the 1945 Constitution addressed federal redistricting—the General Assembly exercised its federal redistricting power despite state constitutional silence (as is still true in some States). See, e.g., *Abbott v. Mexican Am. Legis. Caucus*, 647 S.W.3d 681, 702 (Tex. 2022) (citing *Mumme v. Mars*, 40 S.W.2d 31, 33 (Tex. 1931)) (explaining that Article III, § 28 of the Texas Constitution, by not mentioning mid-decade congressional redistricting, did not bar it, because redistricting was a legislative power, and the legislature held all power not expressly or impliedly forbidden by a state or federal constitutional provision).

Here too, Appellants simply cannot point to anything that negates the General Assembly’s federal constitutional authority to engage in mid-decade redistricting. Constitutional silence dooms Appellants’ claim. See *LULAC*, 548

U.S. at 415 (“With respect to a mid-decade redistricting . . . the Constitution and Congress state no explicit prohibition.”).

B. History confirms the framers did not intend to bar mid-decade redistricting.

The General Assembly *has* conducted mid-decade redistricting under Missouri’s previous Constitutions. Nothing in the 1945 Constitution suggests the framers intended to strip away that preexisting power.

Mid-decade redistricting is not new in Missouri. Following the General Assembly’s passage of an apportionment act in 1872, the General Assembly redistricted again in 1877—*before* the 1880 census. *See* D13, D14. As was widely understood, the General Assembly’s reason for doing so was to shore up the Democratic Party’s power in the wake of the 1876 election. *See Twenty-Ninth General Assembly*, *The Springfield Leader*, (Jan. 25, 1877) (available at State Historical Society of Missouri, <https://shsmo.newspapers.com/>) (“The special committee on congressional boundaries met and organized last night The committee agreed to redistrict the state, or at least change some of the congressional districts.”).⁶ Despite the clear partisan stakes of that mid-

⁶ *See also Jefferson City. Proceedings of the Legislature Yesterday*, *THE KANSAS CITY JOURNAL* (Jan. 20, 1877) (available at State Historical Society of Missouri, <https://shsmo.newspapers.com/>) (“Mr. Anthony, of Morgan, one of the special committee selected by the Democrats to redistrict the state, reported a bill this morning that aims to make, beyond peradventure, all the congressional districts of the state Democratic.”); *Re-Districting the State*, *THE SEDALIA WEEKLY EAGLE* (Jan. 26, 1877) (available at State Historical Society of

decade redistricting, the State is unaware of any legal challenge to that effort—strongly suggesting that it was broadly understood that the courts had no authority to prevent mid-decade redistricting. Indeed, mid-decade redistricting was also common nationwide at the time.⁷

In subsequent decades, Missouri swung from redistricting mid-decade to utterly failing to redistrict, even following the decennial Census. From 1901 to 1931, Missouri did not adjust its congressional districts at all,⁸ prompting several years of (now unconstitutional) at-large representation.⁹ This dereliction explains *why* the 1943–1944 Constitutional Convention delegates added § 45—to ensure that the 1901–1931 redistricting drought (and at-large representation) would not occur again.

To achieve that end, the Missouri Constitutional Convention agreed in 1944 on Amendment 7 to File No. 21, what became § 45. Amendment 7’s history establishes that § 45 creates a mandatory floor for redistricting to occur

Missouri, <https://shsmo.newspapers.com/>) (“Among the first acts of our Democratic Legislature was the raising of a committee in the House to redistrict the State into Congressional Districts.”).

⁷ See Erik J. Engstrom, *Stacking the States, Stacking the House: The Partisan Consequences of Congressional Redistricting in the 19th Century*, 100 AM. POL. SCI. REV. 419, 421 (Aug. 2006) (noting how in Ohio, the general assembly redistricted seven times between 1878 and 1892).

⁸ Lloyd M. Short, *Congressional Redistricting in Missouri*, 25 AM. POL. SCI. REV. 634, 639 (1931).

⁹ ERIK J. ENGSTROM, *PARTISAN GERRYMANDERING AND THE CONSTRUCTION OF AMERICAN DEMOCRACY* 76 (2013).

at least once per decennial period, triggered by the decennial census and subsequent congressional reapportionment. *See* Debates of the 1943–1944 Constitutional Convention of Missouri—1943–44, vol. 22, 6750, 7030–32 (September 6, 1944). No evidence suggests the delegates deemed mid-decade redistricting to be a problem—even though they surely knew it had previously happened in Missouri. *See* File No. 21, Report No. 1 of Committee No. 23 on Phraseology, Arrangement and Engrossment, Article IV, Legislative Department, Congressional, State Senatorial and Representative Districts at 22–24 (September 19, 1944).¹⁰ The delegates’ silence reinforces that they did not intend to ban mid-decade redistricting. *Cf. Koons Buick Pontiac GMC, Inc. v. Nigh*, 543 U.S. 50, 63 (2004) (noting another case involving a “dog that didn’t bark”).

Moreover, mid-decade redistricting continued *after* § 45’s adoption. During the 1960s, Missouri struggled to establish constitutionally-compliant congressional districts. In 1965, a federal court declared the General Assembly’s 1961 congressional map unconstitutional. *Preisler v. Sec’y of State (Preisler I)*, 238 F. Supp. 187, 190 (W.D. Mo. 1965) (per curiam). The court deferred drawing new congressional districts itself, reasoning that “the State Legislature of Missouri has an *unmistakable duty* to reapportion the

¹⁰<https://babel.hathitrust.org/cgi/pt?id=umn.31951d024262663&seq=1088&q1=congress&view=2up>

Congressional Districts of that State.” *Id.* at 191 (emphasis added). This holding would have made no sense if the Missouri Constitution was understood to prohibit mid-decade redistricting.

Again and again, the General Assembly redistricted and the federal district court rejected the map. *See Preisler v. Sec’y of State (Preisler II)*, 257 F. Supp. 953, 956, 980, 984–85 (W.D. Mo. 1966), *aff’d sub nom.*, *Kirkpatrick v. Preisler*, 385 U.S. 450, 450 (1967); *Preisler v. Sec’y of State (Preisler III)*, 279 F. Supp. 952, 955, 1004 (W.D. Mo. 1967), *aff’d sub nom.*, *Kirkpatrick v. Preisler*, 394 U.S. 526, 533 (1969); *Preisler v. Sec’y of State (Preisler IV)*, 341 F. Supp. 1158, 1160 (W.D. Mo. 1972). In total, the General Assembly conducted *three* mid-decade redistrictings in the 1960s in response to previous maps being thrown out by the courts.

In all these cases, the federal courts recognized that the General Assembly had the power to redistrict mid-decade. *E.g.*, *Preisler II*, 257 F. Supp. at 982 (“Primary responsibility . . . rests on the 1967 General Assembly of Missouri.”); *Preisler IV*, 341 F. Supp. at 1162 (“[U]nless and until the State of Missouri enacts a timely and constitutionally permissible new Congressional Redistricting Act . . .”). These courts recognized that the General Assembly can “take all necessary action”—redistricting mid-decade—“to comply with its duty under the Federal, *as well as its own State*, Constitution.” *Preisler I*, 238 F. Supp. at 191 (emphasis added). Yet under Appellants’ theory, all these

federal court rulings were legally erroneous—and the federal courts should have simply imposed a new map.

C. Constitutional structure reinforces the General Assembly’s plenary redistricting authority.

Constitutional structure reinforces that Missouri’s framers knew how to—but did not—prohibit mid-decade redistricting. When the Constitution limits legislative power, it explicitly says so: “the general assembly shall have no power.” To give just one example, Article III, § 37 states that the General Assembly “shall have no power” to issue bonds, except under specific circumstances. Mo. Const. art. III, § 37.

Phrases like “shall not” are “words of prohibition.” *Brooks v. State*, 128 S.W.3d 844, 847 (Mo. banc 2004). And the Missouri Constitution uses such phrases in several other parts of Article III. *See, e.g.*, art. III, § 37 (“Limitation on state debts and bond issues.—The general assembly shall have no power to contract or authorize the contracting of any liability of the state, or to issue bonds thereof, except (1) to refund outstanding bonds, the refunding bonds to mature not more than twenty-five years from date. . . .”); *id.* at § 40 (“The general assembly shall not pass any local or special law: (1) authorizing the creation, extension or impairment of liens; (2) granting divorces; (3) changing the venue in civil or criminal cases. . . .”); *id.* at § 41 (“Indirect enactment of local and special laws—repeal of local and special laws.—The general assembly

shall not indirectly enact a special or local law by the partial repeal of a general law; but laws repealing local or special acts may be passed.”); *id.* at § 42 (“Notice of proposed local or special laws.—No local or special law shall be passed unless a notice, setting forth the intention to apply therefor and the substance of the contemplated law, shall have been published in the locality where the matter or thing to be affected is situated at least thirty days. . . .”); *id.* at § 43 (“Title and control of lands of the United States—exemption from taxation—taxation of lands of nonresidents.—The general assembly shall never interfere with the primary disposal of the soil by the United States, nor with any regulation which Congress may find necessary for securing the title in such soil to bona fide purchasers.”); *id.* at § 44 (“No law shall be valid fixing rates of interest or return for the loan or use of money, or the service or other charges made or imposed in connection therewith, for any particular group or class engaged in lending money.”).

Section 45, of course, uses no such language. Section 45’s absence of prohibitory language confirms its lack of temporal restriction on redistricting. *See* D19: P5 (“That the Framers did not include those terms in Section 45 only further underscores that the Constitution permits, rather than prohibits, mid-decade congressional redistricting by the General Assembly here.”); *cf.* *Russello v. United States*, 464 U.S. 16, 23 (1983) (“[W]here Congress includes particular language in one section of a statute but omits it in another section

of the same Act, it is generally presumed that Congress acts intentionally and purposely in the disparate inclusion or exclusion.” (cleaned up)); *accord Selleck v. Keith M. Evans Ins., Inc.*, 535 S.W.3d 779, 784 (Mo. App. E.D. 2017); *Jantz v. Brewer*, 30 S.W.3d 915, 918 (Mo. App. S.D. 2000).

D. Precedent bolsters the General Assembly’s plenary redistricting authority.

This Court’s precedent confirms the General Assembly’s discretion to conduct mid-decade redistricting. In *Pearson v. Koster*, this Court analyzed Article III, § 45, and it recognized “*only* three requirements” on the General Assembly’s redistricting power: district contiguity, compactness, and equality of population. 359 S.W.3d at 38 (emphasis added). As long as districts complied with these three limitations, Missouri courts “*shall* respect the political determinations of the General Assembly” *Id.* at 40 (emphasis added). Beyond that, “the General Assembly . . . is vested in its representative capacity with all the primary power of the people and . . . has the power to enact any law not prohibited by the federal or state constitution.” *Three Rivers Junior Coll. Dist. of Poplar Bluff v. Statler*, 421 S.W.2d 235, 243 (Mo. banc 1967). That is why this Court in *Pearson* rejected an invitation to recognize an additional limitation on the redistricting power—namely that “political motivations of various types caused Missouri’s Congressional districts to be

reconfigured so as to eliminate a Congressional district now held by a Democrat.” *Pearson*, 359 S.W.3d at 41–42.

E. Out-of-state precedent supports the General Assembly’s plenary redistricting authority.

Out-of-state precedents analyzing materially similar state constitutions reinforce the State’s argument. “[A]ppellate court decisions from other states can be persuasive when they are based on similar facts and ‘sound principles and good reason.’” *Penzel Construction Co., Inc. v. Jackson R-2 Sch. Dist.*, 544 S.W.3d 214, 234 (Mo. App. E.D. 2017) (quoting *Craft v. Philip Morris Companies, Inc.*, 190 S.W.3d 368, 380 (Mo. App. E.D. 2005)). Although both parties can identify some out-of-state precedential support, the weight of cases reinforce the General Assembly’s mid-decade redistricting ability.

For example, the Minnesota Supreme Court grappled with a 1913 mid-decade redistricting of legislative districts. Employing principles familiar to Missouri courts today, the court permitted mid-decade redistricting. *Weatherill*, 147 N.W. at 106. The court held that Minnesota’s redistricting clause, without a clear statement restricting when the legislature could redistrict, set a floor, not a ceiling. *Id.*

As the *Weatherill* court explained, “in the absence of some constitutional limitation upon the subject, the Legislature would possess the power to redistrict the state at will” *Id.* The *Weatherill* court concluded that “the

theory that the Constitution imposes that as a duty, and not as a mere prohibition against reapportionment at some time other than at the first session after a census, seems most consistent with the manifest purpose to be attained.” *Id.* And, it demanded a clear statement to divest power: “[H]ad there been any intention to restrict or limit the time when a reapportionment might be made, those framing the Constitution had language at their command which, if employed, would not have left that intention shrouded in doubt or uncertainty.” *Id.* This logic cleanly demonstrates the limited function of § 45 and the proper use of the negative-implication canon. *Contrast* Appellants’ Br. at 21. Courts look for clear statements restricting legislative power and the absence of restricting language indicates an absence of a restriction. *See Weatherill*, 147 N.W. at 106. This Court should too.

Other States have also reinforced their legislatures’ ability to redistrict mid-decade, upholding legislative redistricting discretion in the absence of clear, restrictive language. For example, the Texas Supreme Court explained that Article III, § 28 of the Texas Constitution “neither expressly nor impliedly forecloses this [redistricting] power from being exercised at another time.” *Mexican Am. Legis. Caucus*, 647 S.W.3d at 702 (citing *Mumme*, 40 S.W.2d at 33). As in Missouri, where the redistricting power is explicitly housed in the legislature’s hands, “the Legislature is exercising its legislative power to make

laws, not ‘a power ordinarily and intrinsically belonging to another department of the government.’” *Id.*

The Georgia Supreme Court also refused to read in nonexistent restrictions on mid-decade redistricting. The court stated, “[h]ad the intent been to depart from the 1976 Constitution and limit the General Assembly to only one redistricting after each census, the framers of the 1983 Constitution could have made an express provision to that effect” *Blum v. Schrader*, 637 S.E.2d 396, 398 (Ga. 2006). As in Missouri, the Georgia Constitution “requires the General Assembly to reapportion itself at least once after each census if ‘necessary,’ but does not limit the exercise of that power to a once-in-a-decade occurrence. The frequency of reapportionment between censuses is *solely a matter of unfettered legislative discretion*, unrestricted by any state constitutional prohibition.” *Id.* at 399 (emphasis added). Interpreting § 45 to not allow mid-decade redistricting, would be out of step with jurisprudence in sister States with similar constitutional provisions.

F. Appellants and Amici’s counterarguments fail.

Throughout their briefing, Appellants and Amici make serial errors. *First*, they vitiate the plenary power rule by inappositely comparing the General Assembly to redistricting commissions of limited powers. *Second*, they botch the negative-implication canon. *Third*, Appellants and Amici distort this Court’s precedents. *Fourth*, they also misread the constitutional history. And,

finally, Appellants and Amici resort to unpersuasive out-of-state precedents. For all these reasons, their objections to the Circuit Court’s judgment fail.

1. Appellants fail to negate the plenary power rule by analogizing the General Assembly to commissions of limited powers.

Appellants correctly concede that “[t]he Missouri Constitution ‘is not a grant of power, but rather a limitation on the power of the Legislature.’” Appellants’ Br. at 16 (quoting *State v. Shelby*, 64 S.W.2d 269, 271 (Mo. banc 1933)). This is the plenary power doctrine—which dooms Appellants’ case. See *supra* Section I.A.

Nevertheless, Appellants and Amici inject artificial ambiguity into § 45 by invoking cases involving delegated state legislative redistricting authority, now conferred on *commissions*. See *Preisler v. Doherty*, 284 S.W.2d 427 (Mo. banc 1955); *State ex rel. Gordon v. Becker*, 49 S.W.2d 146 (Mo. banc 1932). In particular, Appellants and Amici place great weight on this Court’s 1955 decision in *Doherty*, see Appellants’ Br. at 20–21; *Wise* Br. at 15–20; *Healey* Br. at 6–7, but they badly misread it.

Doherty concerned constitutional controls on commissions, not the General Assembly. The distinction is dispositive. Commissions “only ha[ve] the authority expressly granted to [them] by the language of the constitution and implicitly necessary to carry out [their] express duties.” *State ex rel. Teichman v. Carnahan*, 357 S.W.3d 601, 607 (Mo. banc 2012) (citing *Thompson*

v. Comm. on Legislative Rsch., 932 S.W.2d 392, 395 (Mo. banc 1996)). Conversely, the General Assembly exercises plenary authority. *See Blaske*, 821 S.W.2d at 835. Indeed, *Doherty* itself recognized the importance of this distinction, as the Court was careful to note it was “not dealing with a law enacted by our General Assembly, which as a coordinate branch of our government has all of the legislative power of the State except that denied it by express limitations of the Constitution.” *Doherty*, 284 S.W.2d at 431–32; *see also id.* at 431 (“[T]he courts may not interfere with the wide discretion which the legislature has in making apportionments . . . when legislative discretion has been exercised.”). The Court should thus apply *Doherty* and affirm.

2. Appellants misunderstand and misapply the negative-implication canon.

Next, Appellants try to squeeze a temporal redistricting limit out of § 45 by invoking the disfavored negative implication (“*expressio unius*”) canon. *See* Appellants’ Br. at 16–18, 21–22. According to Appellants, the affirmative requirement that the General Assembly redistrict once per decade *implies* that it cannot redistrict at other times. *See id.* at 21–22. But this argument fails—for several reasons. *See* D19: P4 (rejecting this argument).

First, this Court has repeated that the negative implication canon “is to be used with great caution.” *Six Flags*, 179 S.W.3d at 269–70 (quoting *Pippins v. City of St. Louis*, 823 S.W.2d 131, 133 (Mo. App. E.D. 1992)); *see also*

Springfield City Water Co. v. City of Springfield, 182 S.W.2d 613, 618 (Mo. 1944) (“Great caution is required in the application of the maxim.”). Especially in “constitutional cases.” *C.S. v. Mo. State Hwy. Patrol Crim. Just. Info. Serv.*, 716 S.W.3d 264, 267 n.3 (Mo. banc 2025). “The maxim should be invoked only when it would be natural to *assume by a strong contrast* that that which is omitted must have been intended for the opposite treatment.” *Six Flags*, 179 S.W.3d at 270. Section 45 lacks any such ambiguity or “strong contrast,” so resorting to the canon is impermissible.

Second, in any event, Appellants misapply the negative-implication canon. Once again, § 45 unambiguously states that the General Assembly *must* redistrict once per decade. The negative implication of that command is that redistricting is *not* mandatory at other times. *See Tinnin v. Modot & Patrol Employees’ Retirement System*, 647 S.W.3d 26, 35 (Mo. App. W.D. 2022) (noting in the statutory context, “the word “shall” generally prescribes a mandatory duty” (quoting *Gross v. Parson*, 624 S.W.3d 877, 889 (Mo. banc 2021))). In other words, all agree that no one could sue the General Assembly for failing to redistrict a second time during a particular decade.

It is a logical axiom that a “minimum does not imply a maximum.” *See, e.g., Frasher v. Spradling*, 743 S.W.2d 109, 110–11 (Mo. App. W.D. 1988) (finding that a statutory minimum where the “ordinance says nothing about maximum compensation” does not imply a maximum). Appellants do not grasp

this. However, a simple hypothetical helps illustrate their error. Imagine a lease term says that a tenant shall pay his rent by the fifth day of each month. The negative implication is that the tenant is not liable for breaching the lease if he pays before the fifth day of the month, or perhaps that he is not required to pay rent a second time after paying once. But no one would say the tenant breached his lease by paying on the third day of the month, and no one would say the tenant is liable if he paid future months of rent early. So too here; once the General Assembly redistricts *once* per decade, it has satisfied its constitutional obligation. But the General Assembly is not barred if it does more than the minimum required of it.

3. Appellants distort this Court's precedents.

Turning to precedent, Appellants and Amici misread several Missouri cases.

Appellants rely heavily on *Pestka v. State*, 493 S.W.3d 405 (Mo. banc 2016), where this Court held that the Missouri Senate acted too late in overriding a veto of legislation under Article III, § 32 of the Missouri Constitution.¹¹ See Appellants' Br. at 16–17; *Pestka*, 493 S.W.3d at 407–09. But *Pestka* is distinguishable on several grounds.

¹¹ The operative component of the § 32 reads:

Every bill presented to the governor and returned with his objections shall stand as reconsidered in the house to which it is returned. If the

To start, Section 32, analyzed in *Pestka*, is materially different to § 45. Compare Mo. Const. art. III, § 45 (“*When . . .*, the general assembly shall” (emphasis added)), with *id.* art. III, § 32 (“*If . . .*, the general assembly shall” (emphasis added)). Section 32’s “if” “demonstrates that a veto session is not triggered unless and until a bill is returned by the governor on or after the fifth day before the end of the regular legislative session.” *Pestka*, 493 S.W.3d at 411; see also *In re Beyersdorfer*, 59 S.W.3d 523, 535 (Mo. banc 2001) (“If expresses a condition or limitation.”). Therefore, when this condition was not met, the Senate lacked the authority to override the Governor’s veto. *Pestka*, 493 S.W.3d at 407. “When,” on the other hand, expresses a temporal trigger for action, see, e.g., *State ex rel. Major v. Patterson*, 129 S.W. 888, 891 (Mo. 1910) (“at the time that”), not a condition that must be met to act. Therefore, contrary to Appellants’ assertion, *Pestka* does not create any “*clear implication*” that restricts the General Assembly’s redistricting power. See Appellants’ Br. at 17.

governor returns any bill with his objections on or after the fifth day before the last day upon which a session of the general assembly may consider bills, the general assembly shall automatically reconvene on the first Wednesday following the second Monday in September for a brief period not to exceed ten calendar days for the sole purpose of considering bills returned by the governor. . . .

Mo. Const. art. III, § 32.

Additionally, *Pestka*'s interpretation was necessary to avoid absurdity and rendering constitutional text surplusage. *Pestka*, 493 S.W.3d at 412 ("Not only does this construction render the limitation of 'on or after the fifth day' before the end of the regular legislative session meaningless, it also leads to an absurd result."). Here, the State's interpretation of § 45 suffers from none of those problems. Unlike in *Pestka*, declining Appellants' pleas to insert implied temporal restrictions into § 45 does not render any of the provision's language surplusage. Section 45 merely sets a floor that redistricting must take place at least once per decade. Also, unlike *Pestka*'s analytical focus on finding consistency in the text of § 32 itself, Appellants attempt to read in a negative implication from other, tenuously related parts of the Constitution, concerning state legislative, rather than congressional, redistricting, and commissions of limited, rather than plenary, power.

Finally, unlike § 32, § 45 has not been subject to a series of amendments wherein the "the people of Missouri gradually have restricted the legislature's power." *Pestka*, 493 S.W.3d at 412. In fact, before the 1945 Constitution enumerated § 45, the General Assembly exercised its plenary congressional redistricting power without any constitutional command. Section 45's objective was to ensure that the Legislature exercised that power—and duty—more frequently.

Next, Appellants misread *Conservation Commission v. Bailey*, 669 S.W.3d 61 (Mo. banc 2023). See Appellants’ Br. at 17–18. That case concerned whether the “Missouri Constitution permits the General Assembly to limit the Conservation Commission’s authority to expend and use conservation funds for the constitutionally enumerated purposes.” *Conservation Commission*, 669 S.W.3d at 67. Contorting *Conservation Commission* to fit in their negative-implication theory, Appellants miss that case’s crucial distinguishable point: *Conservation Commission* concerns policing the executive-legislative separation of powers. See *Conservation Commission*, 669 S.W.3d at 69 (“Under this constitutional principle [separation of powers], the General Assembly ‘may not use its appropriation authority to encroach on powers vested solely in the separate, coequal branches of government.’” (quoting *Rebman v. Parson*, 576 S.W.3d 605, 609 (Mo. banc 2019))). Specifically, the General Assembly could not use its appropriations power to usurp the Commission’s authority, explicitly delineated under Article IV, §§ 40–44. *Id.* at 67. Contrary to what Appellants think, it was not an implication which divested the General Assembly of its power of the purse in *Conservation Commission*, but rather the “unambiguous[]” language of Article IV. *Id.* at 68.

Here, unlike in *Conservation Commission*, there is no such executive-legislative separation-of-powers problem. The General Assembly, and the General Assembly alone, exercises congressional redistricting authority. In

fact, any derogation thereof would represent a threat to the General Assembly's authority. Despite Appellants' continued attempts to conjure some temporal limitation on the General Assembly's § 45 powers, they cannot.

In *Conservation Commission*, this Court also foreclosed Appellants' invocation of *Rebman v. Parson*, 576 S.W.3d 605 (Mo. banc 2019). Citing *Rebman*, Appellants try to characterize that case's executive-legislative separation-of-powers conflict as somehow substantiating their negative-implication theory against the headwinds of plenary power. See Appellants' Br. at 18. They fail.

This Court has neatly summarized *Rebman*: "In *Rebman*, the General Assembly included language in an appropriation bill that prevented funds for administrative law judge (ALJ) salaries within the Department of Labor and Industrial Relations from being used on any ALJ appointed between 2012 and 2015." *Conservation Commission*, 669 S.W.3d at 69 (citing *Rebman*, 576 S.W.3d at 607–08). "This Court found that restriction to be unconstitutional, as 'executive departments are constitutionally empowered to make personnel choices without interference by the General Assembly.'" *Id.* (quoting *Rebman*, 576 S.W.3d at 610). As with *Conservation Commission*, *Rebman* involved the General Assembly's intrusion into the province of a coordinate branch. Here no such intrusion occurs. And, here, no textual or structural clues exist to divest the General Assembly of its plenary power. The General Assembly is

solely vested with the power to conduct congressional redistricting. *See* Mo. Const. art. III, § 45. Thus, *Rebman*, like *Conservation Commission* and *Pestka*, has no bearing.

Appellants' other case citations perform no better. Again, as with the legislative appropriations cases, Appellants cite cases where the General Assembly's authority is clearly constrained by other textual clauses of the Constitution, or where a particular exercise of legislative power infringed on a coordinate branch's authority or an enumerated individual right. For example, Appellants cite *State v. Hamey*, 65 S.W. 946 (Mo. 1902), which concerned alleged legislative intrusion on the right to trial by jury. Appellants' Br. at 21–22. As the *Hamey* court explained, “when the constitution defines the circumstances under which a right may be exercised or a penalty imposed, the specification is an implied prohibition against legislative interference to add to the condition or to extend the penalty to other cases.” *Hamey*, 65 S.W. at 948. In the instant case, this friction, inviting an “implied prohibition against legislative interference,” does not exist. And, again, *Six Flags* governs.

Similarly, *Henderson v. Koenig*, 68 S.W. 72, 75 (Mo. banc 1902), *overruled on other grounds by State ex rel. Buchanan Cnty. v. Imel*, 146 S.W. 783 (Mo. banc 1912), is inapposite to Appellants' argument, and, if anything, supports the State's position. *See* Appellants' Br. at 22. In *Henderson*, other, explicit, textual provisions of the Constitution foreclosed legislative

adjustment of judicial salaries by certain means. *Henderson*, 68 S.W. at 74–75 (stating these provisions); *id.* at 75 (“The constitution has pointed out the precise and specific method by which county officers are to be paid . . .”). And, as with § 45’s *de minimis* redistricting requirement here, the Constitution placed a mandatory duty on the General Assembly to “regulate the fees of all county officers, and for this purpose may classify the counties by population.” *Id.* at 74. This type of mandatory responsibility conferred upon the General Assembly, just like Section 45’s command to redistrict at least once per decade, aligns perfectly with the Circuit Court’s judgment.

Appellants’ citation to *Citizens’ National Bank of Kansas City v. Graham*, 48 S.W. 910 (Mo. banc 1898), is puzzling and not relevant to Appellants’ negative-implication argument, discussing *in pari materia* analysis for later-passed statutes. *See id.* at 911.

Amici also misread Missouri precedent to advance their negative-implication theory. The *Wise* Amici argue that this Court’s 1932 *State ex rel. Gordon v. Becker*, 49 S.W.2d 146 (Mo. banc 1932) case “confirm[s]” that the restriction should be read into § 45. *Wise* Br. at 16. But *Gordon* considered Article III, § 7 of the 1875 Constitution, which addressed *state legislative* apportionment. And the relevant constitutional text was completely different; indeed, Section 7 established that the apportionment would last “*until the next decennial census* by the United States shall have been taken . . . when the

apportionment shall be revised and adjusted on the basis of that census, and every ten years thereafter on the basis of the United States census” Mo. Const. art. III, § 7 (1875) (emphasis added). This designated endpoint does not exist in § 45. Additionally, if the General Assembly failed to pass a state legislative redistricting in that first session, § 7 would divest the redistricting power to the “Governor, Secretary of State and Attorney-General, within thirty days after the adjournment of the General Assembly” *Id.* This necessarily barred mid-decade redistricting because subsequent sessions of the General Assembly would be explicitly barred from redistricting and the power would then be explicitly divested to the executive branch.

The *Wise* Amici also lean heavily on *State ex rel. City of St. Louis v. Seibert*, 27 S.W. 624 (Mo. banc 1894). See *Wise* Br. at 9, 12–14. As a threshold matter, and fatally for the *Wise* Amici, they even admit that the “*expressio unius*” principles in *Seibert* are “distinct from the modern statutory negative-implication canon referenced” in *Six Flags*. *Wise* Br. at 9, n.5. And *Six Flags* is the relevant yardstick. They concede that *Six Flags* requires a “strong contrast” and default back to the unpersuasive point that the “contrast between Sections 10 and 45” is sufficiently “strong” to divest the General Assembly of authority. *Id.* In any event, *Seibert* is easily distinguishable because this Court was analyzing a sequential list for “[a]ll appropriations of money by the successive general assemblies.” *Seibert*, 27 S.W. at 624 (quoting

Mo. Const. art. IV, § 43 (1875)).¹² Lists, such as § 43, are naturally suitable for the *expressio unius* canon. *City of Columbia v. Henderson*, 399 S.W.3d 493, 496 (Mo. App. W.D. 2013) (citing *PDQ Tower Servs., Inc. v. Adams*, 213 S.W.3d 697, 699 (Mo. App. W.D. 2007); *State on inf. Huffman v. Sho-Me Power Co-op.*, 191 S.W.2d 971, 977 (Mo. banc 1946)). Today's § 45 is not; there is no list, simply an unambiguous command.

4. Appellants and Amici misunderstand the history.

While Appellants ignore the Constitutional Convention, Amici misinterpret it. No historical evidence suggests that the delegates of the 1943–1944 Constitutional Convention deemed mid-decade redistricting to be a problem. Despite the dearth of evidence, Amici contort historical square pegs to fit in the circular holes of their preferred narrative. *See Wise Br.* at 20–24. In particular, Appellants emphasize the Committee's statement that "[u]nder the rewriting of this section the first re-apportionment would be made in 1951 for the election in 1952." *Wise Br.* at 22 (quoting File No. 21, Report No. 1 of the Committee No. 23 on Phraseology, Arrangement and Engrossment, Art. IV, Legislative Department, Congressional, State Senatorial and Representative Districts at 23–24 (Sept. 19, 1944)). However, this rewrite had

¹² Today's Article III, § 36 sets a fairly similar list of appropriations with some minor variations from the 1875 version. *See Mo. Const. art. III, § 36.*

nothing to do with any explicit or implicit restriction on mid-decade redistricting.

First, § 45's plain text, like the adopted amendment preceding it, lacked any temporal restriction. If the Convention sought to restrict the General Assembly with a back-end temporal limitation, it would have said so. *Second*, the Committee commentary about the "first re-apportionment" explains that the new enumeration of districts would take place in 1951 for the census of 1950. The clue is in the full language, which the Appellants ignore. The Committee stated that "[u]nder the rewriting of this section," *id.*, 1951 was when the first *mandatory* redistricting take place. This makes sense. Under the prior amendment version, the General Assembly would be required to redistrict in 1950, *before the new number of representatives* was enumerated by Congress. 2 U.S.C. § 2a(a)–(b) (deadline for reporting apportionment to the States); *see also* 13 U.S.C. § 141(a)–(b) (deadline for calculating apportionment). Therefore, Missouri could have fewer drawn districts in 1952 than those to which it was entitled after the 1950 census. If § 45 sets a minimum threshold, 1951—after the new congressional apportionment—rather than 1950, is a logical correction.

Appellants and Amici also cannot make sense of the several mid-decade redistrictings in the 1960s. Appellants just ignore them. *See generally* Appellants' Br. Meanwhile, Amici attempt to discount their relevance by

proposing an *ad hoc* exception to their preferred one-redistricting-per decade rule for court orders. *See Wise Br.* at 25 n.12 (calling these 1960s maps “not mid-decade redistricting efforts” because the previous maps were “invalidated”); *Healey Br.* at 7 n.2 (suggesting that the courts “allow[ed] the General Assembly to enact . . . remedial map[s]”).

But that makes no sense. In those cases, the federal courts could have—and presumably would have—simply imposed a map following the 1960s cases if they believed the Missouri Constitution prohibited the General Assembly from redistricting more than once per decade. *See, e.g., People ex rel. Salazar v. Davidson*, 79 P.3d 1221, 1231–32 (Colo. 2003) (holding that “judicially-created districts are just as binding and permanent as districts created by the General Assembly” and that they can remain in effect until the next decennial census without offending the Elections Clause). Indeed, the General Assembly was not even a party in those federal cases, meaning that the federal courts did *not* order the General Assembly to repeatedly redistrict in the 1960s. *See Harris v. Hardeman*, 55 U.S. 334, 344 (1852) (“[D]ecrees and judgments bind only parties and privies.”). Instead, the federal courts left the General Assembly the *option* to redistrict multiple times during the 1960s—and the General Assembly did precisely that because no one perceived a state constitutional bar to multiple redistrictings during the 1960s.

5. Appellants' out-of-state precedents are unpersuasive.

Finally, Appellants and Amici spend significant time discussing a handful of out-of-state cases where courts imposed limitations on redistricting. *See* Appellants' Br. at 23–27; *Wise* Br. 26–29. Appellants and Amici primarily invoke Colorado, South Dakota, and California, but these cases, like the handful of other precedents, are distinguishable, incompatible with Missouri's methods of constitutional interpretation, and not persuasive.

Appellants and Amici rely heavily on the Colorado Supreme Court's decision in *People ex rel. Salazar*, 79 P.3d 1221. *See* Appellants' Br. at 23–25; *Wise* Amicus Br. at 26, 31. *Salazar* concerned a challenge to Colorado's mid-decade redistricting in the wake of a judicially-drawn map following the 2000 census. *See* 79 P.3d at 1227. The *Salazar* court remarked that “when the constitution specifies a timeframe for redistricting, then, by implication, it forbids performing that task at other times.” *Salazar*, 79 P.3d at 1238 (citing *People ex rel. Mooney v. Hutchinson*, 50 N.E. 599, 601 (Ill. 1898); *Denney v. State ex rel. Basler*, 42 N.E. 929, 931–32 (Ind. 1896)).

That reasoning is squarely foreclosed by this Court's plenary power precedents. In Missouri at least, the legislature retains authority unless it is *expressly* taken away. *Blaske*, 821 S.W.2d at 835. Unlike the Colorado Supreme Court, this Court cannot rely on a weak “implication” from constitutional silence to fabricate a new limit on legislative power. *See, e.g.,*

McGrew v. Mo. Pac. Ry. Co., 230 Mo. 496, 132 S.W. 1076, 1084 (Mo. banc 1910), *overruled on other grounds by McGrew Coal Co. v. Mellon*, 315 Mo. 798, 287 S.W. 450 (Mo. banc 1926) (“Constitutional limitations upon the legislative power may be made, it is true, either expressly or by implication, but the implication must at least be clear and strong and convincing, if not absolutely necessary.” (citations omitted)).

Salazar’s disfavored reasoning does not gain favor through Appellants and Amici citing more cases relying on this implicit restriction of redistricting analysis. A majority of the other precedents cited by Appellants and Amici, like *Salazar*, can be traced back to *People ex rel. Mooney v. Hutchinson*, 50 N.E. 599, 601 (Ill. 1898), which rested on a negative implication from different constitutional text. *See Salazar*, 79 P.3d at 1238; *Harris v. Shanahan*, 387 P.2d 771, 779–80 (Kan. 1963); *In re Below*, 855 A.2d 459, 462–63 (N.H. 2004) (citing *Salazar*); *In re Certification of a Question of Law from U.S. District Court, District of South Dakota, Western Division*, 615 N.W.2d 590, 595 (S.D. 2000). Even if not directly traced back to *Mooney*, all of the other cases share in this implicit restriction reasoning, often without analysis. *See Lamson v. Sec’y of Commonwealth*, 168 N.E.2d 480, 483–84 (Mass. 1960); *State ex rel. Thomson v. Zimmerman*, 60 N.W.2d 416, 424 (Wis. 1953); *Opinion of the Justices*, 47 So. 2d 714, 716 (Ala. 1950). But this disfavored reasoning is no

more persuasive because it is older or because it has propagated through several states.

Moving to South Dakota, Appellants invoke *In re Certification of a Question of Law from U.S. District. Court, District of South Dakota, Western Division*, 615 N.W.2d 590 (S.D. 2000). See Appellants' Br. at 25–26. But the South Dakota Constitution contains substantially different text.¹³ Unlike the Missouri Constitution, the South Dakota Constitution includes explicit deadlines for apportionment and judicial arrogation of redistricting if the legislature fails to comply by the deadline. *In re Certification*, 615 N.W.2d at 595; S.D. Const. art. III, § 5 (“If any Legislature whose duty it is to make an apportionment shall fail to make the same as herein provided, it shall be the duty of the Supreme Court within ninety days to make such apportionment.”).

¹³ Article III, § 5 of the South Dakota Constitution delineating reapportionment for state legislators reads:

Legislative districts shall consist of compact, contiguous territory and shall have population as nearly equal as is practicable, based on the last preceding federal census. An apportionment shall be made by the Legislature in 1983 and in 1991, and every ten years after 1991. Such apportionment shall be accomplished by December first of the year in which the apportionment is required. If any Legislature whose duty it is to make an apportionment shall fail to make the same as herein provided, it shall be the duty of the Supreme Court within ninety days to make such apportionment.

S.D. Const. art. III, § 5.

Additionally, the South Dakota decision rested on in-state precedent interpreting a then-existing express prohibition on mid-decade redistricting. *See In re Certification*, 615 N.W.2d at 594–95 (“Any other conclusion must reverse these two long-standing precedents.”). The key precedent was a 1933 decision, interpreting a then-extant constitutional provision. *See id.* (citing *In re Opinion of the Judges*, 246 N.W. 295 (S.D. 1933)). That previous provision contained an express prohibition: mandating redistricting every ten years after the census “but at no other time.” *In re Opinion of the Judges*, 246 N.W. at 296 (quoting S.D. Const. art. III, § 5 (1889)). The South Dakota court noted that this “express prohibition” was “part and parcel of and inseparable from the affirmative command requiring action at the first session after each enumeration.” *Id.*¹⁴ That markedly different history renders South Dakota’s Constitution far from the “similar facts” required to make out-of-state authority useful. *Penzel*, 544 S.W.3d at 234 (quoting *Craft*, 190 S.W.3d at 380). Appellants are thus simply incorrect to assume that “both South Dakota and Missouri impose a temporal limitation on when redistricting may occur.” Appellants’ Br. at 25.

¹⁴ This decision was affirmed without analysis of the changed constitutional text in the second precedent. *See Kane v. Kundert*, 371 N.W.2d 172, 174 (S.D. 1985).

Appellants also point to the California Supreme Court’s ruling in *Legislature v. Deukmejian*, 669 P.2d 17 (Cal. 1983). See Appellants’ Br. at 26–27. But, unlike Missouri, the provision of the California Constitution examined in *Deukmejian* had specific language temporally bounding when reapportionment must take place—within the “first session after each census.” See Cal. Const. art. XXI, §1 (1879, as amended in 1980) (“In the year following the year in which the national census is taken under the direction of Congress and at the beginning of each decade . . . the Legislature shall, at its *first session after each census*, adjust such districts and re-apportion the representation . . .”) (emphasis added). Unlike, the “when” language in § 45, California’s explicit designation that only the “first session” can redistrict sets a start and end time for redistricting. Additionally, like the South Dakota case, this California decision rested on precedent, which, like the Colorado decision, rested on a misapplication of the *expressio unius* canon. See *Deukmejian*, 669 P.2d at 23–25. For the reasons that *Salazar* was inapposite, so here too.

Therefore, these out-of-state precedents lack the “sound principles and good reason[ing]” such that they should not persuade this Court. See *Penzel Construction Co.*, 544 S.W.3d at 234.

II. Under the *Purcell* principle, this Court should not void the 2025 Map for the upcoming election.

With the 2026 midterm elections approaching, a judicial order to implement a new congressional map for those elections would cause chaos and be inequitable. *See State ex rel. Ellis v. Creech*, 259 S.W.2d 372, 374 (Mo. banc 1953) (highlighting that injunctive relief is discretionary and is “to be exercised in accordance with well settled equitable principles”). If this case were in federal court, the *Purcell* principle would apply and require any injunction in favor of Appellants to apply only *after* the 2026 elections. *See Abbott*, 146 S. Ct. at 419–20 (staying lower district court injunction issued after candidate filing for primary had started). This Court should follow the lead of the federal courts—and other state courts—and adopt the *Purcell* principle. Doing so prevents chaotic disruption to candidates planning their campaigns, state and local election officials running elections, and Missourians as they prepare to vote. *See Purcell*, 549 U.S. at 4–5 (“Court orders affecting elections, especially conflicting orders, can themselves result in voter confusion and consequent incentive to remain away from the polls.”).

As the U.S. Supreme Court recognized long ago, “where an impending election is imminent and a State’s election machinery is already in progress, equitable considerations might justify a court in withholding the granting of immediately effective relief in a legislative apportionment case, even though

the existing apportionment scheme was found invalid.” *Reynolds v. Sims*, 377 U.S. 533, 585 (1964). “In awarding or withholding immediate relief, a court is entitled to and should consider the proximity of a forthcoming election and the mechanics and complexities of state election laws, and should act and rely upon general equitable principles.” *Id.* Such “considerations” exist here, where many Missourians have already initiated campaigns for the duly-enacted congressional districts and candidate filing deadlines approach. *See* § 115.349, RSMo. In such circumstances the U.S. Supreme Court “has recognized that ‘practical considerations sometimes require courts to allow elections to proceed despite pending legal challenges.’” *Merrill v. Milligan*, 142 S. Ct. 879, 882 (Mem.) (2022) (Kavanaugh, J., concurring) (quoting *Riley v. Kennedy*, 553 U.S. 406, 426 (2008)). This is the “*Purcell* principle.” *See Purcell*, 549 U.S. at 1.

Purcell derives from a universal, “basic tenet of election law: When an election is close at hand, the rules of the road should be clear and settled.” *Democratic National Committee v. Wisconsin State Legislature*, 141 S. Ct. 28, 31 (2020) (Kavanaugh, J., concurring denial of application to vacate stay). Statewide elections are complex, and stability is important to several groups of people. First, candidates need to know what congressional map governs so that they can plan their campaigns; doing so, after all, requires fundraising, hiring, and other substantial planning. Second, “thousands of state and local officials and volunteers must participate in a massive coordinated effort to

implement the lawmakers' policy choices on the ground before and during the election, and again in counting the votes afterwards." *Id.* Third, voters need to know who their candidates will be, which is why alterations during elections damages voters' "confidence in the fairness of the election." *Id.* Allowing last-minute litigation challenges to congressional districts undermines all these reliance interests. *Id.* ("Even seemingly innocuous late-in-the-day judicial alterations to state election laws can interfere with administration of an election and cause unanticipated consequences.").

This Court should recognize the *Purcell* principle to prevent electoral chaos. State courts around the country have done so. *See, e.g., Moore v. Lee*, 644 S.W.3d 59, 65–66 (Tenn. 2022) (holding that a state analogue to the *Purcell* principle called for "restraint when asked to enjoin the effectiveness of constitutionally suspect reapportionment plans" and vacating a lower court injunction impacting "the electoral process in [the] state"); *Alliance for Retired Americans v. Secretary of State*, 240 A.3d 45, 50 (Maine 2020) ((discussing *Purcell* and noting that "when challenges to election laws are lodged on the eve of an election it is imperative that plaintiffs act as expeditiously as possible in their pursuit of relief"); *Liddy v. Lamone*, 919 A.2d 1276, 1288–1291 (Md. 2007); *Chi. Bar Ass'n v. White*, 898 N.E.2d 1101, 1107–08 (Ill. App. Ct. 2008). Other States have adopted a similar principle, if not explicitly referring to *Purcell*. *See Pender County v. Bartlett*, 649 S.E.2d 364, 376 (N.C. 2007)

(observing that since “candidates have been preparing for the 2008 election in reliance upon the districts as presently drawn” and “to minimize disruption to the ongoing election cycle, the remedy explained above shall be stayed until after the 2008 election”); *Fay v. Merrill*, 256 A.3d 622, 637–38 & n. 21 (Conn. 2021) (discussing how enforcing a declaratory judgment close to an election “presumably would implicate the factors identified by the United States Supreme Court in *Purcell v. Gonzalez* . . .”). As the Ohio Supreme Court explained, *Purcell*’s wisdom applies to state courts. *State ex rel. Ohio Democratic Party v. LaRose*, 257 N.E.3d 130, 137 (Ohio 2024) (“While built primarily on the principles of federalism, *Purcell* also stands ‘for the common-sense principle that judges—novices in election administration—should not meddle in elections at the last minute, . . . because when they do, they are more likely to do more harm than good.’ (cleaned up)).

Thus, even if the Court agrees with Appellants’ merits argument, it should hold that *Purcell* bars state courts from ordering Missouri to alter its election map until after the 2026 elections. Doing so is necessary to prevent courts from “improperly insert[ing] [themselves] into an active primary campaign.” *Abbott*, 146 S. Ct. at 419. The gears of state and local government are turning to facilitate the upcoming 2026 midterm election. For example, the first day for candidate filing for the August 4, 2026 primary election is

February 24, 2026.¹⁵ Unsurprisingly, candidates have already been planning and organizing their campaigns based on the duly-passed congressional map.¹⁶ *See also Merrill*, 142 S. Ct. at 880 (Kavanaugh, J., concurring) (“Filing deadlines need to be met, but candidates cannot be sure what district[s] they need to file for.”). That is why, under nearly identical factual circumstances, the U.S. Supreme Court barred courts from altering Texas’s congressional map during the 2026 congressional elections. *See Abbott*, 146 S. Ct. at 419. There, a three-judge district court found that Texas’s map was an unconstitutional racial gerrymander on November 18, 2025. *See League of United Latin Am. Citizens v. Abbott*, --- F. Supp. 3d ---, EP-21-CV-00259-DCG-JES-JVB, 2025 WL 3215715 (W.D. Tex. Nov. 18, 2025). That was ten days after the opening of candidate filing for the primary election, and the U.S. Supreme Court declared that “[t]he District Court improperly inserted itself into an active primary campaign, causing much confusion and upsetting the delicate federal-state balance in elections.” *Id.* Here, the candidate filing season will be well

¹⁵ Missouri Secretary of State, *2026 Missouri Election Calendar* (2026), <https://www.sos.mo.gov/elections/calendar/2026cal>.

¹⁶ In each of Missouri’s eight congressional districts, candidates are already fundraising and organizing. *See generally* Federal Election Commission, *U.S. House Elections* (2026), <https://www.fec.gov/data/elections/house/>. The FEC provides data on fundraising for each Missouri district. For example, in Missouri’s 4th Congressional District candidate financial totals already exceed \$1 million. *See* FEC, *Missouri – House District 04* (2026), <https://www.fec.gov/data/elections/house/MO/04/2026/>.

underway by the time this Court hears this case, § 115.349.2 (candidate filing opens “the last Tuesday in February”), so this Court should refrain from upsetting election rules by court decision and thus “improperly insert[ing] itself into an active primary campaign.”

For all these reasons, if the Court contemplates Appellants’ arguments, it should not displace the current map until after the upcoming election. *See Reynolds*, 377 U.S. at 586 (holding that lower court “acted wisely” in maintaining existing map for upcoming elections even after entering final judgment finding that existing map was illegal).

CONCLUSION

For the foregoing reasons, Respondents respectfully request that this Court affirm the judgment below.

Dated: February 9, 2026

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I hereby certify that this brief contains 10,747 words, excluding tables, the cover, the signature, and certificates, and complies with Missouri Supreme Court Rule 84.06(b); includes the information required by Rule 55.03; and includes information on how the brief was served on the opposing party.

/s/Graham Miller

CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2026, a true and correct copy of the above was filed with the Court's electronic filing system to be served by electronic methods on counsel for all parties entered in this case.

/s/ Graham Miller
Deputy Solicitor General
Counsel for Respondent Denny
Hoskins

Stipulated Exhibit 28

AFFIDAVIT OF TAMMY BROWN

Affiant first being duly sworn, on her oath attests:

1. I served as a local election official for 25 years in Jackson County, Missouri. I was a Commissioner on the Jackson County Election Board from 2001 to 2008, and then I was the Republican Director of the Board from 2009 until my retirement in July 2026.

2. During my tenure as a Commissioner and the Republican Director, I helped facilitate over 100 elections in Jackson County, Missouri. The Jackson County Election Board serves about 270,000–280,000 registered voters who reside within our jurisdiction.

3. During my 25 years at the Board, I assisted with implementing new congressional maps three different times: in 2012, in 2022, and then in 2026 for the implementation of the House Bill 1 map.

4. I personally assisted with implementing Missouri's new congressional map in 2026. I also helped prepare ballots for absentee and military voters for the August primary election. The primary election was held on August 4, 2026. Under Missouri law, that election must be certified by August 18, 2026.

5. I am aware that there is a lawsuit seeking to change Missouri's congressional map after the August 2026 primary election. I have never heard of a lawsuit like this before.

6. Based on my 25 years of experience as a local election official, I believe that it is literally impossible to change Missouri's 2026 congressional map after the primary election and before the general election on November 3, 2026. In my view, changing the congressional map after the primary election would put the entire election at risk.

7. Implementing a new congressional map is an arduous, time-intensive duty for local election authorities. It involves manually reassigning precincts to a new congressional

district in the Missouri Centralized Voter Registration (“MCVR”) database. This is a step-by-step, meticulous process that involves printing maps, proofing lines, assigning each precinct to the correct congressional district, and ensuring that each voter is placed in the correct district. This requires the assistance of every member of our office and usually takes 2 weeks to complete. If pressed for overtime and weekend work, I estimate that the Jackson County Election Board could implement a new map in the MCVR database in 7–10 days. I do not know how long it would take other local election authorities to implement a new congressional map in the MCVR database.

8. During any ongoing election, the MCVR database prevents us from moving any voters from one district to another. This makes congressional district lines impossible to change during any election—whether or not the election is congressional in nature. The database locks 8 to 10 weeks before any election because of military voters and absentee voters who need to receive mail ballots before election day. The MCVR database remains locked at least until the election is certified, which must occur within 2 weeks after election day under State law.

9. Jackson County is holding a recall election on September 1, 2026, for an Independence City Council member. Absentee voting for that recall election began on July 21, 2026, and no excuse absentee voting will begin on August 18, 2026. The Jackson County Election Board will then have until September 14, 2026, to certify the results of that recall election. During that timeframe, the MCVR database will remain locked and cannot be changed.

10. Meanwhile, the certification date for Missouri’s general election is August 25, 2026, under state law. At that time, the congressional district lines will already be set up in the MCVR database, and the database cannot be changed. Thus, there is no time window to change

the congressional district lines in the MCVR database between now and the general election on November 3, 2026.

11. Changing a congressional map before an election also involves more than just altering the district assigned to each voter in MCVR. After a map is changed in MCVR, local election authorities must design and test ballots to ensure that the ballots are tabulating correctly. This process usually takes about 2 weeks. Local election authorities also need an additional week to send ballots for printing after we finish designing ballots.

12. Local election officials must comply with federal law that requires them to send mail ballots to military voters no later than 45 days before the election. This federal law is known as the Uniformed and Overseas Citizens Absentee Voting Act (“UOCAVA”).

13. Under State law, local election officials must also prepare ballots for absentee voters no later than 42 days before an election.

14. To comply with these deadlines, local election officials start preparing military and absentee ballots 10 weeks before an election. At that time, we design, proofread, and test the ballots. Then, we send the military and absentee ballots for printing 8 weeks before the election.

15. I am aware that the Missouri Secretary of State can request a waiver from UOCAVA’s deadlines in some circumstances where it is impossible to comply with the 45-day deadline for sending mail ballots to military voters. However, I have never heard of Missouri requesting a waiver or receiving a waiver under UOCAVA. Also, even if we obtained a waiver under UOCAVA, state law would still require us to send ballots to absentee voters 42 days before the election. Thus, even if we could obtain a waiver, that would only provide an additional 3 days to prepare and send ballots to absentee voters.

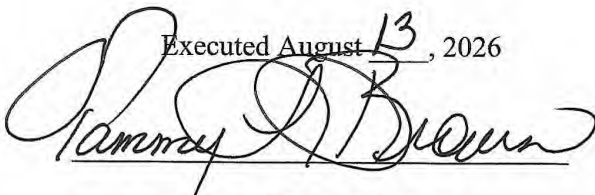
16. I have never heard of a State changing its congressional map after completing its primary election. I cannot imagine how a State could justify forcing voters to vote in different districts for a primary and general election.

17. I was provided the opportunity to review the affidavit of Brianna Lennon, the County Clerk and Election Authority of Boone County. Ms. Lennon states that 2022 congressional district has not been overwritten in MCVR. Ms. Lennon also states that no additional work would be needed to re-implement the 2022 congressional districts.

18. Ms. Lennon's representation is wrong as to Jackson County. In Jackson County, we exclusively implemented the HB 1 congressional map in the MCVR database for the 2026 congressional election. Reverting to the 2022 map would require us to reopen the MCVR database and to manually adjust each precinct's and each voter's congressional district back to the 2022 map. As far as I am aware, there is no "magic button" that would suddenly allow us to revert to the 2022 congressional districts.

19. For these reasons, I believe that is impossible to change Missouri's congressional map after the 2026 primary election. The MCVR database will remain locked between now and the General Election in November 2026. Also, even if the database somehow opened, changing the congressional map, preparing ballots, and sending mail ballots to overseas and absentee voters would take weeks that local election officials do not have.

20. I declare under penalty of perjury that the foregoing is true and correct.

Executed August 13, 2026

Affiant, Tammy Brown

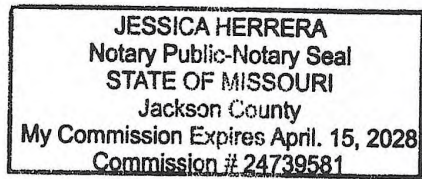
State of Missouri
County of Jackson

In witness whereof, I have hereunto subscribed my name and affixed my official seal.

Subscribed and sworn before me this 13th day of August in the year 2026.

Jessica Herrera
Notary Public

My commission expires: April 15, 2028



Stipulated Exhibit 29

IN THE
SUPREME COURT OF MISSOURI

JAKE MAGGARD, ET AL.	)	
	)	
Appellant,	)	
	)	
v.	)	Cause No. SC101581
	)	
STATE OF MISSOURI, ET AL.,	)	
	)	
Respondent.	)	

APPEAL TO THE SUPREME COURT OF MISSOURI
FROM THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI
19TH JUDICIAL CIRCUIT, DIVISION 1
THE HONORABLE BRIAN K. STUMPE
CIRCUIT COURT CAUSE No. 25AC-CC09120

BRIEF OF AMICUS CURIAE BRIANNA LENNON
COUNTY CLERK & ELECTION AUTHORITY OF BOONE COUNTY
IN SUPPORT OF APPELLANTS

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TABLE OF CONTENTS

TABLE OF AUTHORITIES	3
IDENTITY AND INTEREST OF <i>AMICUS CURIAE</i>	6
STATEMENT OF CONSENT	7
ARGUMENT	8
I. The State’s deviation from longstanding historical precedent poses practical challenges in the short term and represents a threat to democracy in the long term.....	8
A. The Secretary of State’s actions deviate from settled historical practice	8
B. Delaying certification of the referendum petition will have serious practical consequences for election administration.....	11
C. Upsetting settled expectations after citizens make their voices heard is bad for democracy.....	14
CONCLUSION.....	18
CERTIFICATE OF SERVICE AND COMPLIANCE	20

TABLE OF AUTHORITIES

CASES

<i>State ex rel. Kemper v. Carter</i> , 165 S.W. 773 (Mo. 1914)	9, 11
<i>State ex inf. McKittrick ex rel. Ham v. Kirby</i> , 163 S.W.2d 990 (Mo. banc 1942)	10
<i>State ex rel. Jones v. Atterbury</i> , 300 S.W.2d 806 (Mo. banc 1957)	10

STATUTES

58 U.S.C. § 20302(a)(8)(A)	12
----------------------------------	----

RULES

Rule 84.05	7
------------------	---

CONSTITUTIONAL PROVISIONS

Mo. Const., art. III, sec. 52(b)	8, 9
--	------

OTHER SOURCES

Gregg Palermo, <i>Referendum backers say they have enough validated signatures, push Mo. Secretary of State for decision</i> , Spectrum News (Mar. 6, 2026), https://spectrumlocalnews.com/mo/stlouis/news/2026/03/05/missouri-redistricting-fight	7
Summer Ballentine, <i>Unions Deliver Signatures to Block Right-to-Work in Missouri</i> , Associated Press (Aug. 18, 2017), https://apnews.com/mo-state-wire-b8f048a4e14445f6bfa744f444c19591 (last visited Apr. 9, 2026)	9
Jason Hancock, <i>Missouri officials defy decades of precedent in bid to block gerrymandering referendum</i> , Missouri Independent (Dec. 16, 2025), https://missouriindependent.com/2025/12/16/missouri-officials-defy-decades-of-precedent-in-bid-to-block-gerrymandering-referendum/	10

Jason Hancock, <i>On the GOP's agenda: making it harder for Missouri voters to put issues on the ballot</i> , The Kansas City Star (Mar. 21, 2019), https://www.kansascity.com/news/politics-government/article228588309.html	11
Jim Willis, <i>Trucking Firms Sue to Put New Bill Into Effect</i> , Daily American Republic, Sep. 29, 1981.....	10
Letter from the Missouri Association of County Clerks and Election Authorities to the Speaker of the House (Aug. 27, 2025), https://www.missourinet.com/2025/09/15/missouris-new-congressional-map-could-complicate-midterm-voting-clerks-warn/	12
<i>About the Boone County Clerk</i> , https://www.boonemo.gov/clerk/bio.asp (last visited April 7, 2026).....	14
Michael G. Miller, et al., <i>The Disparate and Durable Effects of Mail Voting Restrictions: Evidence from Texas</i> , J. POL. (forthcoming), https://doi.org/10.1086/737439	15
Donald Moynihan, <i>Understanding Elections from an Administrative Burden Perspective: Making Participation Easy by Minimizing Unnecessary Barriers</i> , Institute for Responsive Government (Sept. 13, 2023), https://responsivegov.org/research/understanding-elections-from-an-administrative-burden-perspective-making-participation-easy-by-minimizing-unnecessary-barriers	16
James A. Gardner, <i>Essay: Democratic Legitimacy Under Conditions of Severely Depressed Voter Turnout</i> , U. Chi. L. Rev. Online, https://lawreview.uchicago.edu/online-archive/democratic-legitimacy-under-conditions-severely-depressed-voter-turnout (last visited, Apr. 7, 2026).....	16
Ian Vandewalker, <i>Digital Disinformation and Vote Suppression</i> , Brennan Center for Justice, (Sept. 2, 2026), https://www.brennancenter.org/our-work/research-reports/digital-disinformation-and-vote-suppression	16

Grace Gordon et al., <i>The Dangers of Partisan Incentives for Election Officials</i> , Bipartisan Policy Center (Apr. 6, 2022), https://bipartisanpolicy.org/report/the-dangers-of-partisan-incentives-for-election-officials/	17
Travis Zimpfer, <i>Greitens Signs Right-to Work Bill into Law, Marking Turning Point for Missouri Organized Labor</i> , The Missouri Times (Feb. 6, 2017), https://themissouritimes.com/greitens-signs-right-work-bill-law-marking-turning-point-missouri-organized-labor/	17
2025–2026 OFFICIAL MANUAL STATE OF MISSOURI 57, https://www.sos.mo.gov/bluebook/2025-2026	17

IDENTITY AND INTEREST OF *AMICUS CURIAE*

Amicus Brianna Lennon is the elected County Clerk and Election Authority of Boone County, Missouri, where she has served since 2019. She previously worked in the Missouri Secretary of State's Office as the Deputy Director of Elections and the first coordinator of its Election Integrity Unit. In her capacity as the County Clerk and Election Authority of Boone County, *amicus* is responsible for administering elections for over 125,000 voters, managing voter registration and voter list maintenance, and establishing precincts in accordance with Boone County's political subdivision district boundaries.

Amicus teaches Election Law as an Adjunct at the University of Missouri School of Law and created and co-hosts a national-award winning election administration podcast, *High Turnout Wide Margins*. These professional experiences give *amicus* unique insight into the administrative demands associated with preparing for an election.

However this case is decided, *amicus* will do everything in her power to administer orderly elections on August 4, 2026, and November 3, 2026. She has no doubt that her fellow local election officials will do the same. But *amicus* believes that effective election administration will become much harder if this Court permits the Secretary of State to deviate from historical practice by refusing to suspend the legislature's most recent Congressional

redistricting plan, HB1, upon receiving enough signed petitions to trigger a voter referendum. Allowing the August primary to be conducted using districts that are likely to be stayed upon the referendum's certification—which could occur a matter of weeks before the August primary¹—will result in chaos, confusion, and unnecessary expense. *Amicus* submits this brief in support of Plaintiffs-Appellants urging this Court to carefully consider the practical consequences for local election officials of refusing to suspend HB1 in a manner consistent with longstanding practice.

STATEMENT OF CONSENT

This brief is filed under Rule 84.05(f). The parties consented to the filing of this brief in writing on April 10, 2026. Rule 84.05(f)(2).

¹ See Gregg Palermo, *Referendum backers say they have enough validated signatures, push Mo. Secretary of State for decision*, Spectrum News (Mar. 6, 2026), available at <https://spectrumlocalnews.com/mo/st-louis/news/2026/03/05/missouri-redistricting-fight>.

ARGUMENT

I. The State's deviation from longstanding historical precedent poses practical challenges in the short term and represents a threat to democracy in the long term

The Secretary of State's interpretation of Mo. Const. art. III, § 52(b) upsets longstanding precedent and represents a pronounced shift in Missouri's popular referendum process. It creates significant logistical challenges for elections officials by injecting uncertainty into the districting and ballot preparation processes in the heat of an election year. It also creates a serious risk of voter confusion and frustration arising from a post hoc change to the referendum process, issues that will only be exacerbated if voters come to view the process as open to partisan influence. Those concerns may ultimately lead to diminished faith and decreased participation in Missouri's democracy.

A. The Secretary of State's actions deviate from settled historical practice

Previous Secretaries of State confronted with the exact circumstances presented here have adhered to a settled rule: they suspended a pending law immediately upon receipt of petitions that appeared to bear the requisite number of signatures to trigger a voter referendum. This approach is entirely consistent with the plain meaning of the Missouri Constitution, which

provides that “[a]ny measure referred to the people shall take effect when approved by a majority of the votes cast thereon, and not otherwise.” Mo. Const. art. III, § 52(b). This Court confirmed as much more than a century ago. *See State ex rel. Kemper v. Carter*, 165 S.W. 773, 778 (Mo. banc 1914) (“When we consider the primary object of the adoption of the referendum and have regard to the evils which its friends had in mind to correct by it, any view other than that it suspends the taking effect of the act against which it is invoked till a vote be had is illogical and well-nigh unthinkable.”). As *amicus* began preparing for the upcoming election cycle, she had no reason to believe this year’s referendum process would unfold any differently.

Elected officials across the political spectrum have long shared this same understanding. In 2018, Secretary of State Jay Ashcroft, a Republican, immediately suspended a right-to-work law upon receiving over 300,000 referendum petitions.² His spokeswoman explained that the right-to-work law would remain suspended throughout the signature certification process, which local election officials were given over 10 weeks to complete.³

² *See* Summer Ballentine, *Unions Deliver Signatures to Block Right-to-Work in Missouri*, Associated Press (Aug. 18, 2017) available <https://apnews.com/mo-state-wire-b8f048a4e14445f6bfa744f444c19591> (last visited Apr. 9, 2026).

³ *Id.*

Similarly, in 1981, Secretary of State John Kirkpatrick, a Democrat, “automatically suspended” a law rolling back restrictions on trucks when he received referendum petitions containing 165,000 signatures, *before* completing signature review and certification.⁴

Against the backdrop of this bipartisan consensus, the current Secretary of State’s refusal to suspend HB1 is unprecedented.⁵ This consensus is particularly important because consistent custom and usage “carries with it much persuasive authority” in Missouri constitutional interpretation. *State ex inf. McKittrick ex rel. Ham v. Kirby*, 163 S.W.2d 990, 996 (Mo. banc 1942). The “interpretation placed upon a constitutional provision may be taken into consideration by the courts as persuasive of what was intended where an ambiguity exists.” *State ex rel. Jones v. Atterbury*. 300 S.W.2d 806, 817 (Mo. banc 1957).

If the current Secretary does not like the referendum process, he can do what his predecessor did: adhere to it, then advocate for changes later in the

⁴ See Jim Willis, *Trucking Firms Sue to Put New Bill Into Effect*, Daily American Republic (Sep. 29, 1981).

⁵ Jason Hancock, *Missouri officials defy decades of precedent in bid to block gerrymandering referendum*, Missouri Independent (Dec. 16, 2025), available at <https://missouriindependent.com/2025/12/16/missouri-officials-defy-decades-of-precedent-in-bid-to-block-gerrymandering-referendum/>.

proper forums. Secretary Ashcroft, believing that the initiative and referendum process had “gotten out of hand,” supported “a spate of Republican-backed bills in the Missouri House intended to cut down on initiative petitions and make it harder for them to win approval at the ballot box.”⁶ But changing the referendum process *sua sponte* is not a permissible way for the Secretary to register his disagreement with that process or its outcome. In so doing, the Secretary is ignoring “[t]he fact that the people of the state reserved to themselves the right to say whether an act of the Legislature should ever become an effective law.” *State ex rel. Kemper v. Carter*, 165 S.W. 773, 778 (Mo. banc 1914).

B. Delaying certification of the referendum petition will have serious practical consequences for election administration

The Secretary of State may be responsible for overseeing elections in Missouri, but it is local election officials like *amicus* who will be forced to deal with the consequences of his unprecedented refusal to suspend HB1. In Missouri, all voter registration data—including districts, precincts, addresses, and assigned ballot styles—is housed in the statewide voter registration database known as the Missouri Centralized Voter Registration

⁶ Jason Hancock, *On the GOP’s agenda: making it harder for Missouri voters to put issues on the ballot*, The Kansas City Star (Mar. 31, 2019), available at <https://www.kansascity.com/news/politics-government/article228588309.html>.

System (“MCVR”). While MCVR’s technical infrastructure is maintained by the Secretary of State’s office, county-level election officials are responsible for inputting and editing data within the system. Accordingly, it is county-level election officials, not the Secretary of State, who must make updates after redistricting occurs.

Once new district lines are enacted, the Secretary of State’s Office provides raw Geographic Information System (“GIS”) data files to local election officials. These files create the basis for the new districts. Yet local election offices cannot simply import these maps into MCVR to assign voters to their new districts. Instead, preparing new district maps “requires local election authorities to manually adjust districts on a street-by-street and house-by-house basis because GIS integration is not available currently [in MCVR].”⁷ Election officials must complete this “time-intensive” process before they can start creating and assigning ballots to individual voters.⁸ Thus, until the Court rules in this case, election officials cannot create the

⁷ Letter from the Missouri Association of County Clerks and Election Authorities to the Speaker of the House (Aug. 27, 2025), available at <https://www.missourinet.com/2025/09/15/missouris-new-congressional-map-could-complicate-midterm-voting-clerks-warn/>.

⁸ *Id.*

election in MCVR nor create ballots for voters to cast in the August Primary Election.

Typically, the last possible time for a local election official to establish new districts for an election is the ninth Tuesday before an election. That's because the Uniform and Overseas Citizens Absentee Voting Act (“UOCAVA”) requires clerks to send military and overseas voters their ballots no later than 45 days before an election. 58 U.S.C. § 20302(a)(8)(A). To meet this deadline, clerks must first create, proof, print, and package UOCAVA ballots—which, in turn, requires clerks to know the district boundary lines so that they can prepare ballots with the correct races and candidates.⁹

If the Secretary had immediately suspended HB1 consistent with longstanding practice, the popular referendum process would not have interfered with the ballot preparation process. There was, and there still would be, plenty of time to prepare UOCAVA ballots using the preexisting district boundary lines. Instead, by departing from this practice, and inviting litigation, the Secretary has left clerks in the dark. As it stands, clerks have no way of knowing which set of districts they will ultimately need to use

⁹ This timeline all supposes that the Secretary will create a district “definition” within the MCVR so that elections officials can tie voters to the 2025 Congressional districts. If the Secretary does not create this “definition,” downstream technical issues may occur.

when administering the upcoming elections: the Secretary could allow HB1 to remain in effect through the primary and then suspend it before the general. In that circumstance, administering an election using legally valid districts will be complicated and costly. This uncertainty is an unnecessary byproduct of the Secretary's unwarranted decision to depart from a referendum process that has served Missourians well for decades.¹⁰

C. Upsetting settled expectations after citizens make their voices heard is bad for democracy

Another consequence of the Secretary's inaction is that clerks will need to expend time and resources to address voter confusion arising from his departure from settled practice. Local elections officials will likely field an increased number of calls from concerned voters who may be unsure if they have received the correct ballot. Clerks in counties that encompass multiple

¹⁰ While navigating all of this, ballot preparation isn't the *only* thing clerks will be doing. While they work to meet the UOCAVA ballot deadline, they will also be managing other responsibilities, including delivering vital services to Missourians. For example, *amicus's* duties include "keeping accurate records of the orders, rules, and proceedings of the County Commission[,] . . . administering the Records Management budget," issuing merchant and liquor licenses for the county, and managing railroad and utility taxes. *About the Boone County Clerk*, available at <https://www.boonemo.gov/clerk/bio.asp> (last visited April 7, 2026).

Congressional districts may need to make last-minute changes to polling locations because of shifts in district boundary lines, causing confusion for voters as they head out to the polls. This fear is borne out by *amicus*'s own professional experiences: whenever there are changes to *any* aspect of the election administration process, clerks end up spending more time educating voters and assuaging their concerns. On Election Day, this can result in longer lines for voters.

Moreover, opaque changes to settled procedural rules can undermine voter turnout and diminish trust in neutral, nonpartisan election administration. Voters who signed the HB1 referendum petition had every expectation, based on longstanding practice, that by signing they were effectively voting to immediately suspend HB1. Now, for reasons that are difficult to discern, the rules have changed, giving voters reason to question the value of participating in Missouri's democracy.

Indeed, research indicates that a voter's negative experience in one election reduces the likelihood that they will turn out to vote in the next.¹¹ Research also indicates that voters who experience a higher "administrative burden" (i.e., having to learn new rules and navigate unfamiliar processes),

¹¹ See, e.g., Michael G. Miller et al., *The Disparate and Durable Effects of Mail Voting Restrictions: Evidence from Texas*, J. POL. (forthcoming) (manuscript at 3, 10), <https://doi.org/10.1086/737439>.

are less likely to vote, an effect that persists in subsequent elections.¹² Voters may be deterred tomorrow because of interference with their settled expectations today. Last minute changes in how elections are administered can themselves cause confusion and chaos that allows election mis- and dis-information to metastasize.¹³ If the Court sides with the Secretary and endorses a departure from settled practice *after* voters sought to avail themselves of that practice, the result may be confusion, reduced democratic participation, and a loss of faith in Missouri's electoral system.

The Secretary's position also exposes the historically nonpartisan administration of referenda in Missouri to the possibility of partisan

¹² See, e.g., Donald Moynihan, *Understanding Elections from an Administrative Burden Perspective: Making Participation Easy by Minimizing Unnecessary Barriers*, Institute for Responsive Government (Sept. 13, 2023), <https://responsivegov.org/research/understanding-elections-from-an-administrative-burden-perspective-making-participation-easy-by-minimizing-unnecessary-barriers>.

¹³ See, e.g., James A. Gardner, *Essay: Democratic Legitimacy Under Conditions of Severely Depressed Voter Turnout*, U. CHI. L. REV., <https://lawreview.uchicago.edu/online-archive/democratic-legitimacy-under-conditions-severely-depressed-voter-turnout> (last visited Apr. 7, 2026); Ian Vandewalker, *Digital Disinformation and Vote Suppression*, Brennan Center for Justice (Sept. 2, 2026), available at <https://www.brennancenter.org/our-work/research-reports/digital-disinformation-and-vote-suppression>.

gamesmanship. A referendum procedure that can change based on the whims of whoever happens to be holding office injects profound uncertainty into the referendum process going forward.¹⁴ Notably, previous Secretaries have respected the will of Missourians even where it cut against their own policy preferences. Secretary Ashcroft's example is again instructive: in suspending the right-to-work law, he frustrated a central policy plank of his own Republican party.¹⁵ The Secretary may be elected as a partisan but, as the State's chief election official, he is "responsible for the overall integrity of the election process and ensuring every registered Missourian's vote counts."¹⁶

This Court should reject the current Secretary's effort to supplant the will of the people with his own.

¹⁴ See, e.g., Grace Gordon et al., *The Dangers of Partisan Incentives for Election Officials*, Bipartisan Policy Center (Apr. 6, 2022), <https://bipartisanpolicy.org/report/the-dangers-of-partisan-incentives-for-election-officials/> (explaining that "growing susceptibility to partisan incentives in election offices undermines the expectation that elections will result in legitimate winners.").

¹⁵ See Travis Zimpfer, *Greitens Signs Right-to Work Bill into Law, Marking Turning Point for Missouri Organized Labor*, The Missouri Times (Feb. 6, 2017), <https://themissouritimes.com/greitens-signs-right-work-bill-law-marking-turning-point-missouri-organized-labor/>.

¹⁶ 2025–2026 OFFICIAL MANUAL STATE OF MISSOURI 57, <https://www.sos.mo.gov/bluebook/2025-2026>.

CONCLUSION

Amicus respectfully asks this Court to reverse the decision below and order the Secretary to suspend HB1, consistent with longstanding practice and the voters' settled expectations at the time they signed the petitions. Reversing will preserve confidence in Missouri's democratic processes and obviate the risk of confusion for voters and local officials alike. Regardless of how this court rules, *amicus* urges the Court to rule swiftly to ensure elections administrators have adequate time to prepare ballots, educate voters, and do everything they can to safeguard full confidence in local election administration.

Respectfully submitted,

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CERTIFICATE OF SERVICE AND COMPLIANCE

On April 10, 2026, a copy of this brief was sent by electronic mail via the Missouri eFiling System to all counsel of record. Rule 103.08.

This brief includes the information required by Rule 55.03. It complies with Rule 86.06(b) and contains 2,479 words.

/s/ Nina McDonnell
Nina McDonnell

Stipulated Exhibit 30

SC101581

SUPREME COURT OF MISSOURI

JAKE MAGGARD, ET AL.

Plaintiffs/Appellants

v.

STATE OF MISSOURI, ET AL.

Defendants/Respondents

Appeal from the Circuit Court of Cole County, Missouri, Case No. 25AC-CC09120

**BRIEF OF *AMICI CURIAE* ST. CHARLES COUNTY DIRECTOR OF
ELECTIONS KURT BAHR, IN HIS PERSONAL CAPACITY, THE AMERICAN
REDISTRICTING PROJECT, AND RESTORING INTEGRITY AND TRUST IN
ELECTIONS IN SUPPORT OF DEFENDANTS-RESPONDENTS**

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TABLE OF CONTENTS

TABLE OF AUTHORITIES	3
INTEREST OF AMICI CURIAE	7
AUTHORITY FOR BRIEF OF AMICI CURIAE	8
SUMMARY OF ARGUMENT	8
ARGUMENT	10
I. It Is Too Late to Implement the Previous Redistricting Plan.	10
A. The Election Is in Full Swing Under the New Map.	10
B. Election Officials Are About to Begin Entering the New Districts into the Databases Used for the Primary and General Elections.	13
II. Missouri Courts Should Not Intervene in the Ongoing Election to Implement the Previous Plan.	16
A. Missouri Courts Historically Do Not Interfere in Elections.	16
B. Missouri Courts Look to the U.S. Supreme Court for Guidance.	18
C. The Court Should Reject Plaintiff-Appellants’ <i>Amici’s</i> Arguments.	23
D. Missouri Courts Should Not Change the Congressional Map Between the Primary and General Elections.	28
CONCLUSION	30
CERTIFICATION	31

TABLE OF AUTHORITIES

<u>CASES</u>	<u>Pages</u>
<i>Abbott v. League of United Latin American Citizens</i> , 607 U.S. ----, 146 S. Ct. 418 (2025).....	20, 25
<i>Am. Party of Tex. v. White</i> , 415 U.S. 767 (1974).....	28
<i>Bost v. Ill. State Bd. of Elecs.</i> , 607 U.S. ----, 146 S. Ct. 513 (2026).....	19
<i>Buckley v. Am. Const. L. Found., Inc.</i> , 525 U.S. 182 (1999).....	17
<i>Bush v. Gore</i> , 531 U.S. 98 (2000).....	29
<i>Callais v. Landry</i> , 732 F. Supp. 3d 574 (W.D. La. 2024).....	22
<i>Calzone v. Ashcroft</i> , 559 S.W.3d 32 (Mo. App. W.D. 2018).....	24
<i>Chastain v. Kan. City Mo. City Clerk</i> , 337 S.W.3d 149 (Mo. App. W.D. 2011).....	18
<i>Democratic Nat’l Comm. v. Wis. State Legislature</i> , 141 S. Ct. 28 (2020).....	20
<i>Hadley v. Junior College Dist. of Metro. Kan. City</i> , 460 S.W.2d 1 (Mo. banc 1970).....	<i>passim</i>
<i>League of United Latin Am. Citizens v. Abbott</i> , 809 F. Supp. 3d 502 (W.D. Tex. 2025), summarily reversed, <i>Abbott v. LULAC</i> , No. 25-845, 2026 WL 1127246 (Apr. 27, 2026).....	21
<i>Lucas v. Forty-Fourth General Assembly of the State of Colorado</i> , 377 U.S. 713 (1964).....	18

<i>Luther v. Hoskins</i> , 730 S.W.3d 567 (Mo. banc 2026).....	9, 23, 24, 25, 26
<i>Merrill v. Milligan</i> , 142 S. Ct. 879 (2022).....	21, 22, 25
<i>Missourians to Protect the Initiative Process v. Blunt</i> , 799 S.W.2d 824 (Mo. banc 1990).....	23
<i>Morse v. Republican Party of Va.</i> , 517 U.S. 186 (1996).....	28, 29
<i>Org. for Black Struggle v. Ashcroft</i> , 493 F. Supp. 3d 790 (W.D. Mo. 2020).....	29
<i>Peters v. Johns</i> , 489 S.W.3d 262 (Mo. banc 2016).....	9, 17
<i>Purcell v. Gonzales</i> , 549 U.S. 1 (2006).....	19
<i>Reynolds v. Sims</i> , 377 U.S. 533 (1964).....	18, 28
<i>Robinson v. Callais</i> , 144 S. Ct. 1171 (2024).....	22
<i>Singleton v. Merrill</i> , No.: 2:21-cv-1291-AMM, No.: 2:21-cv-1530-AMM, 2022 WL 272636, (N.D. Ala. Jan. 27, 2022).....	21
<i>State ex inf. Stipp ex rel. Stokes Mound Sch. Dist. No. 7 v. Colliver</i> , 243 S.W.2d 344 (Mo. Div. 1 1951).....	10
<i>State ex rel. Bushmeyer v. Cahill</i> , 575 S.W.2d 229 (Mo. App. St. Louis 1978).....	18
<u>CONSTITUTIONS</u>	
Mo. CONST. ART. III, § 31.....	25
Mo. CONST. ART. III, § 45.....	24, 26

U.S. CONST. AMEND. XIV	29
------------------------------	----

RULES

Mo. SUP. CT. R. 84.05(f)(2)	8
-----------------------------------	---

STATUTES

RSMo. § 115.349	10
-----------------------	----

RSMo. § 115.125-1	15
-------------------------	----

RSMo. § 115.329	30
-----------------------	----

OTHER SOURCES

<i>2024 Elections Calendar</i> , LA. SEC’Y OF STATE, https://perma.cc/4VPB-HWY3	22
--	----

<i>2026 Missouri Election Calendar</i> , MO. SEC’Y OF STATE, https://perma.cc/ZXM4-XLR3	10, 15, 22, 29
---	----------------

<i>2026 Missouri Elections</i> , FED. ELEC. COMM’N, https://perma.cc/KR3K-E83E	11
---	----

<i>About Us</i> , THE AM. REDIST. PROJ., https://perma.cc/5ECK-48NF	7
--	---

Cori Bush, <i>Cori Bush Announces Campaign for U.S. Congress in Missouri’s 1st District</i> , YOUTUBE (Oct. 3, 2025), https://perma.cc/ZP7G-W7SJ	11
--	----

Jason Rosenbaum, <i>7 Takeaways from the End of Candidate Filing for Missouri’s August Primary</i> , ST. LOUIS PUB. RADIO (Mar. 31, 2026), https://perma.cc/D33P-6HXT	12
---	----

Kalli Fowler, <i>Here Is What Missouri Candidates Have Raised Ahead of November’s Election</i> , COLUMBIA MISSOURIAN (Apr. 18, 2026), https://perma.cc/Q26W-WU2E	11
--	----

Leah Rainwater, <i>Missouri Sees Significant U.S. Representative Filings Ahead of August Primaries</i> , KQ2 ST. JOSEPH (Mar. 31, 2026), https://perma.cc/792Q-LC3T	12
--	----

Matthew Pilger, <i>Missouri’s New Congressional Map Could Complicate Midterm Voting, Clerks Warn</i> , MISSOURINET (Sept. 15, 2025), https://perma.cc/X7KD-USZ6	14
--	----

<i>Meet Chris Stigall</i> , STIGALL FOR CONGRESS, https://perma.cc/QLJ6-AE8V	11
---	----

<i>Meet Wesley Bell</i> , WESLEY BELL FOR CONGRESS, https://perma.cc/D62D-X477	11
<i>Missouri – House District 1</i> , FED. ELEC. COMM’N, https://perma.cc/NY36-G4ZA	11
Nathan Hall Willett (@ForTheNorthland), X, (Apr. 10, 2026, 11:00 AM), https://perma.cc/ER5Q-D76R	11-12
<i>Our Mission</i> , RESTORING INTEGRITY & TRUST IN ELECS., https://perma.cc/UL25-C94B	8
<i>Redistricting in Missouri after the 2020 census</i> , BALLOTPEDIA, https://perma.cc/2NHF-SHMY	27
The Chris Stigall Show, <i>FACT CHECK: Chris Stigall Endorsed President Trump – TRUE.</i> , YOUTUBE (Apr. 15, 2026), https://perma.cc/B9UE-CZRG	12
<i>UNOFFICIAL Candidate Filing List: 2026 Primary Election</i> , MO. SEC’Y OF STATE, https://perma.cc/267V-H2MN	11, 12

INTEREST OF AMICI CURIAE

Amicus Curiae Kurt Bahr is the St. Charles County Director of Elections. Director Bahr is the local election official responsible for ensuring the orderly administration of elections in St. Charles County, including the August 2026 congressional primary election. Director Bahr has a vested interest in this case because he must meet statutory deadlines and accomplish certain tasks in advance of the primary election. Director Bahr's interest is especially strong because his jurisdiction—St. Charles County—would significantly change if there was a reversion from HB1 to the 2022 map. Under HB1, all of St. Charles County is in one congressional district. But under the 2022 map, St. Charles County is split between multiple districts. Therefore, if the Court afforded Plaintiffs-Appellants the relief they seek, Director Bahr, along with the rest of his office, would face significant hurdles in meeting the statutory deadlines.

Amicus Curiae the American Redistricting Project (“ARP”) is a “nonpartisan, nonprofit organization working to strengthen our republic by supporting constitutional redistricting, election transparency, and accountable government through education, litigation, and research.” *About Us*, THE AM. REDIST. PROJ., <https://perma.cc/5ECK-48NF>. ARP has a vested interest in this case because it is committed to ensuring clear maps and limiting voter confusion in advance of the 2026 congressional election.

Amicus Curiae Restoring Integrity and Trust in Elections (“RITE”) “supports litigation to stop a well-funded network of activists from using the courts to undermine elections and democracy. RITE’s work protects democratically enacted election laws from attack and abuse by partisan actors and officials working to threaten or dilute the right of

qualified citizens to vote.” *Our Mission*, RESTORING INTEGRITY & TRUST IN ELECS., <https://perma.cc/UL25-C94B>. As such, RITE has an interest in protecting the Missouri General Assembly’s duly enacted redistricting map from collateral attack in this case.¹

AUTHORITY FOR BRIEF OF AMICI CURIAE

“A brief may be filed by amicus curiae in cases before this Court on the merits.” MO. SUP. CT. R. 84.05(f)(2). “The brief shall only be filed with the consent of all parties or upon order of this Court.” *Id. Amici*, by and through counsel, reached out to counsel for all parties to obtain consent to file. Appellants Jake Maggard and Gregg Lombardi consent. Respondents State of Missouri and Denny Hoskins consent. Intervenor-Respondent Put Missouri First consents. Accordingly, *Amici* have authority to file this Brief. *Id.* Furthermore, this Brief in Support of Respondents is timely because it has been filed “within the time allowed for the filing of the brief of the party supported.” *Id.*

SUMMARY OF ARGUMENT

This Court has long held that, regardless of the merits of the underlying action, the Court cannot impose a new redistricting map in advance of an imminent election when the “election machinery already is in operation” and it would be “inequitable and impracticable to attempt” such a shift. *Hadley v. Junior College Dist. of Metro. Kan. City*, 460 S.W.2d 1, 3 (Mo. banc 1970). But that’s exactly the relief Plaintiffs-Appellants seek. Specifically,

¹ Counsel acknowledges the research assistance of Harvard Law School students Tasha Dambacher and Evan Clausner, who contributed research for this Brief under the supervision of undersigned counsel. Counsel assumes full responsibility for the contents of this Brief.

they seek to impose the 2022 Missouri congressional redistricting map by staying the use of the 2025 map (“HB1”) through the 2026 congressional election.

But HB1 has been the congressional redistricting law for Missouri since September 2025—seven months ago. *Luther v. Hoskins*, 730 S.W.3d 567, 570 (Mo. banc 2026). Election officials have already begun implementing the HB1 map and must do so in advance of May 26, 2026—the statutorily mandated certification deadline. *Cf. Hadley*, 460 S.W.2d at 3. Election officials certainly will have incurred significant expenses in advance of this Court’s oral argument on May 12, 2026, to meet the May 26 deadline. *Cf. id.* It would require “substantial additional expense[s]” to change from the HB1 map to the 2022 map, and it would be virtually impossible to do in advance of the May 26 deadline. *Cf. id.*

The “election machinery already is in operation” for candidates as well. *Id.* The candidate filing period has closed, and candidates have already begun raising money and campaigning for the hotly contested primary election nominations. *Cf. id.* Candidates would face significant prejudice if they suddenly were redistricted out of the congressional districts where they filed or had to shift their campaigns to address new groups of voters weeks before the primary.

Finally, voters expect the HB1 map to remain in place. The map has been widely publicized since enactment in September 2025, and any change now would result in mass chaos and confusion. *Peters v. Johns*, 489 S.W.3d 262, 275 (Mo. banc 2016) (noting the State has an interest in “ensuring that election processes are efficient, and avoiding voter confusion”).

The “overriding public interest in the orderly operation” of the impending August 4 primary election requires adherence to the law on which election officials, candidates, and voters have come to rely—HB1. *Hadley*, 460 S.W.2d at 3. This Court should affirm.

ARGUMENT

I. It Is Too Late to Implement the Previous Redistricting Plan.

A. The Election Is in Full Swing Under the New Map.

It is too late to afford Plaintiffs-Appellants the relief they seek: imposition of the old, repealed 2022 congressional districting map in advance of the 2026 congressional primary election. Voters and candidates have already relied on the widely publicized HB1 map and expect it to be in effect for the August 4 primary election—just over three months away.

Many of Missouri’s mandatory statutory deadlines for the primary have already passed. For example, candidate filing, which is statutorily mandated, closed on March 31, 2026—almost a month ago. *2026 Missouri Election Calendar*, MO. SEC’Y OF STATE, <https://perma.cc/ZXM4-XLR3> [hereinafter “*2026 Missouri Election Calendar*”]; § 115.349, RSMo. (“[N]o candidate’s name shall be printed on any official primary ballot unless the candidate has filed a written declaration of candidacy in the office of the appropriate election official by 5:00 p.m. on the last Tuesday in March immediately preceding the primary election.”); *State ex inf. Stipp ex rel. Stokes Mound Sch. Dist. No. 7 v. Colliver*, 243 S.W.2d 344, 350 (Mo. Div. 1 1951) (“[W]here the date of an election is not left to the determination of officials, but is unequivocally fixed by statute, the provision is regarded as mandatory and the election officials have no authority to change the date.”

(quotation omitted)). And weeks or months before the March deadline, candidates, their families, and their supporters had already relied on the congressional districting map in effect (HB1) to make critical decisions about whether to run and whom to support.

With the election now underway, 63 candidates are campaigning for congressional office. *UNOFFICIAL Candidate Filing List: 2026 Primary Election*, MO. SEC’Y OF STATE, <https://perma.cc/267V-H2MN> [hereinafter “*Candidate Filing List*”]. Primary races have been in full swing for a month. Many candidates have already raised significant funds. *See, e.g.,* Kalli Fowler, *Here Is What Missouri Candidates Have Raised Ahead of November’s Election*, COLUMBIA MISSOURIAN (Apr. 18, 2026), <https://perma.cc/Q26W-WU2E>; *Missouri – House District 1*, FED. ELEC. COMM’N, <https://perma.cc/NY36-G4ZA> (showing one candidate in District 1 raised almost \$2 million before March 31, 2026, and another candidate raised nearly \$1 million before March 31, 2026).² And they are already spending those funds on communications targeted to voters in their new districts. *See, e.g.,* Cori Bush, *Cori Bush Announces Campaign for U.S. Congress in Missouri’s 1st District*, YOUTUBE (Oct. 3, 2025), <https://perma.cc/ZP7G-W7SJ>; *Meet Wesley Bell*, WESLEY BELL FOR CONGRESS, <https://perma.cc/D62D-X477>; *Meet Chris Stigall*, STIGALL FOR CONGRESS, <https://perma.cc/QLJ6-AE8V>. Those include attack ads aimed at other candidates. Nathan Hall Willett (@ForTheNorthland), X, (Apr. 10, 2026, 11:00 AM),

² Information on money raised for all congressional candidates before March 31, 2026, can be found on the Federal Election Commission website. *See 2026 Missouri Elections*, FED. ELEC. COMM’N, <https://perma.cc/KR3K-E83E>. Given that March 31, 2026, was the cutoff date, and some candidates did not file until that very day, the numbers for some candidates have certainly increased exponentially in the past month. *Candidate Filing List, supra*.

<https://perma.cc/ER5Q-D76R> (posting attack ad); The Chris Stigall Show, *FACT CHECK: Chris Stigall Endorsed President Trump – TRUE.*, YOUTUBE (Apr. 15, 2026), <https://perma.cc/B9UE-CZRG> (responding to attack ad).

And multiple primary races across the State are hotly contested. *See id.*; Jason Rosenbaum, *7 Takeaways from the End of Candidate Filing for Missouri’s August Primary*, ST. LOUIS PUB. RADIO (Mar. 31, 2026), <https://perma.cc/D33P-6HXT>. For example, in the Sixth District, long-time Republican incumbent Representative Sam Graves, who will have held the seat for 26 years by the time his term ends, announced that he is not running for reelection. Rosenbaum, *supra*; *see also* Leah Rainwater, *Missouri Sees Significant U.S. Representative Filings Ahead of August Primaries*, KQ2 ST. JOSEPH (Mar. 31, 2026), <https://perma.cc/792Q-LC3T>. As a result, five Republican candidates and three Democratic candidates are now vying for a spot on the general election ballot. *Candidate Filing List, supra*.

Likewise, in the First District, a rematch of the 2024 election between former Representative Cori Bush and Representative Wesley Bell is brewing and will be very expensive—just as the 2024 primary was. Rosenbaum, *supra*.

And, in the newly drawn Fifth District, there is a six-way contest in the Republican primary, where the winner will face off against long-time incumbent Representative Emanuel Cleaver. *Candidate Filing List, supra*. Any reversion to the 2022 map would certainly upset the race and put candidates like Taylor Burks and Brad Patty far outside the district’s boundaries. *Id.* Likely frontrunner Rick Brattin would also be outside the district. *Id.*

Not only would implementation of the 2022 map move many candidates outside the districts where they filed, but it would also force them to undergo a mid-campaign shift to target new voters, costing exorbitant new sums and requiring revamped fundraising strategies. In sum, a change to the districts now would work severe prejudice to candidates.

B. Election Officials Are About to Begin Entering the New Districts into the Databases Used for the Primary and General Elections.

In several large Missouri counties that undergo new intra-county splits when the congressional district boundaries shift from the 2022 to the 2025 map and back again, there is insufficient time to accurately implement new districts. The need for substantial time for programming these district boundaries traces back to the Missouri Centralized Voter Registration System (“MCVR”). MCVR is a statewide database of every single registered Missouri voter. Although overseen and managed by the Secretary of State, its data is entered—and later, used—by each local election authority. Local election authorities are usually county clerks, elections directors, or election boards, and (except for those in St. Louis City and Kansas City) they have jurisdiction over an entire county. They are responsible for keeping accurate voter registration records in MCVR, which includes an accurate residential address for each voter. Local election authorities then use MCVR to determine who votes in each district and election, to ensure that every poll list is accurate, and to ensure that every voter’s ballot has exactly the right races—from congressional races all the way down to small, specialized districts and ward elections.

It is vital that MCVR data contains precise information on each of these overlapping districts. However, MCVR does not have an automatic integration with Geographic

Information Systems (“GIS”) tools that can map spatial data (*i.e.*, district lines) onto demographic data. This means that local election officials must “draw” district lines into the “address book” feature of MCVR, often by manually assigning precincts, streets, or even houses to each type of election district—including congressional districts. This is a laborious process. It can take weeks to perform correctly and then check for errors. Errant data must be avoided at all costs because mistakes are potentially irremediable or at best, very difficult to unwind. When voters’ ballots reflect the wrong elections, mass confusion and suspicion of intentional election irregularities will interfere with election integrity, risk post-election litigation, and can even dampen voter participation.

Adding to the pressure, election authorities must engineer these meticulous adjustments under a ticking clock. That’s because local election authorities cannot access MCVR to enter new district lines at just any time of year. For lengthy stretches of time, MCVR is necessarily “locked” to protect against structural districting changes. This lockout lasts for a period before and after each election while ballots are printed and mailed, poll lists are compiled, voting occurs, votes are canvassed, and returns are certified. For example, MCVR will have been locked from January 27, 2026, until the last week of April 2026 to allow for certification—that is, the closing out—of the April 2026 “municipal” elections. Last August, county election authorities published a letter explaining these timing issues. *See* Letter from Sherry Parks, Livingston County Clerk, President MACCEA, to Hon. Jonathan Patterson, Speaker of the House (Aug. 27, 2025), *in* Matthew Pilger, *Missouri’s New Congressional Map Could Complicate Midterm Voting*, *Clerks Warn*, MISSOURINET (Sept. 15, 2025), <https://perma.cc/X7KD-USZ6> [hereinafter “County

Letter”]. Only after this “closing out” can districting changes be made in MCVR. But the new districts must be meticulously entered and then checked before May 26, 2026, when ballots are certified and MCVR is locked again. *See 2026 Missouri Election Calendar, supra*; § 115.125-1, RSMo. (“Not later than 5:00 p.m. on the tenth Tuesday prior to any election . . . the officer or agency calling the election shall notify the election authorities responsible for conducting the election.”).

The May 26 certification deadline itself is uncomfortably close to the August 4 primary considering all the intermediate steps that must still occur. Local election authorities must “know the specific political subdivisions, by name, that will be on the ballot.” *See County Letter, supra*, at 1. Next, “election authorities create every unique ballot type necessary to represent the correct political subdivisions for every registered voter’s address of residence.” *Id.* Finally, “[t]hese ballots must be proofed, ordered, and printed in time for absentee voting and for voters on Election Day.” *Id.* This includes mailing to uniformed and overseas voters at least 45 days before the primary election, or June 20, 2026. All of these steps must therefore be completed without error in just three weeks. May 26, 2026, is a real deadline.

Prudent election authorities, then, have already made plans to ensure they meet the May 26 deadline: they have either entered the new HB1 districts into MCVR before the April election “lock out” period, or they have ensured that they will be entered immediately after MCVR unlocks within the next few days. This is not easy. There is barely sufficient time to finish that process diligently and carefully before May 26, with all the necessary proofing and checking. In larger districts that have to change their congressional district

splits, there would simply not be time for the entry of the HB1 districts to be halted sometime in early to mid-May, and then for the old 2022 congressional district lines to be entered back into MCVR. In short, even if this Court ordered the reimposition of the 2022 districts from the bench at oral argument on May 12, 2026, it would be too late for election officials to reverse course and change the data by the May 26 statutory deadline—a mere two weeks later. As such, it is impossible to hold the August primary elections under the prior map.

II. Missouri Courts Should Not Intervene in the Ongoing Election to Implement the Previous Plan.

A. Missouri Courts Historically Do Not Interfere in Elections.

Missouri courts have long been reticent to interfere in the electoral and political processes, especially close to an election. In fact, this Court has declined to do so in very similar circumstances to this case. In *Hadley v. Junior College District of Metropolitan Kansas City*, 460 S.W.2d 1 (Mo. banc 1970), the Court confronted changes to election districts on the eve of an election. On review of the State’s apportionment of voters into districts to elect trustees to junior colleges, the U.S. Supreme Court concluded that the State’s districting was unconstitutional. But because the U.S. Supreme Court issued its decision too close to the election, this Court “concluded that the overriding public interest in the orderly operation” of the elections required operation of the old—albeit unconstitutional—laws. *Id.* at 3.

This Court noted that local election officials had already undertaken significant tasks: “Absentee ballots for that election are now being printed and other preparations,

including necessary adjustments of voting machines, are in progress.” *Id.* This Court found that there was “not sufficient time” to change the districts in advance of the election, any changes would involve “[s]ubstantial expense[s],” and therefore, “it would be wholly inequitable and impracticable” to attempt such changes. *Id.* at 2-3.

Critically, this Court found there was insufficient time even though the candidate filing period *was still open*. *Id.* at 2. Specifically, the U.S. Supreme Court issued its opinion on February 25, this Court issued its opinion in *Hadley* on March 5, and the candidate filing period did not close until March 7. *Id.* This Court noted, nonetheless, that any change to the election procedures would work prejudice to candidates: “Five candidates have filed for the office, and the election machinery already is in operation.” *Id.* at 3. As a result, this Court held “that the imminence of these elections” made it “unwise for this court hastily to attempt to implement” a new apportionment plan. *Id.* at 2.

Missouri courts have since abided by these principles. For example, this Court has since recognized that the State has “a legitimate, even compelling, interest in protecting the integrity of [its] electoral systems from frivolous candidacies, ensuring that election processes are efficient, and avoiding voter confusion.” *Peters v. Johns*, 489 S.W.3d 262, 275 (Mo. banc 2016) (citation omitted). And this Court has reaffirmed the U.S. Supreme Court’s concerns that “some sort of order, rather than chaos, [should] accompany the democratic processes.” *Id.* (quoting *Buckley v. Am. Const. L. Found., Inc.*, 525 U.S. 182, 187 (1999)). When election rules change too close to an election, that creates chaos and confusion for election administrators, candidates, and voters.

Likewise, courts of appeals have recognized the importance of “maintain[ing] the order, speed, and integrity of the election process.” *State ex rel. Bushmeyer v. Cahill*, 575 S.W.2d 229, 234 (Mo. App. St. Louis 1978). For example, in a recent decision, one Missouri Court of Appeals recognized “serious questions” about whether the courts “had the ability to afford . . . any meaningful relief, even if [it] had found merit in [the] claims” on the eve of an election, given “potential logistical difficulties” identified by local election officials in changing the rules for the election. *Chastain v. Kan. City Mo. City Clerk*, 337 S.W.3d 149, 155 n.3 (Mo. App. W.D. 2011).

B. Missouri Courts Look to the U.S. Supreme Court for Guidance.

Critically, in *Hadley*, the Court fundamentally relied on equitable principles elucidated by the U.S. Supreme Court in reaching its conclusion. For example, this Court noted:

[U]nder certain circumstances, such as where an impending election is imminent and a State’s election machinery is already in progress, equitable considerations might justify a court in withholding the granting of immediately effective relief in a legislative apportionment case, even though the existing apportionment scheme was found invalid. In awarding or withholding immediate relief, a court is entitled to and should consider the proximity of a forthcoming election and the mechanics and complexities of state election laws, and should act and rely upon general equitable principles. With respect to the timing of relief, a court can reasonably endeavor to avoid a disruption of the election process which might result from requiring precipitate changes that could make unreasonable or embarrassing demands on a State in adjusting to the requirements of the court’s decree.

Hadley, 460 S.W.2d at 2 (quoting *Reynolds v. Sims*, 377 U.S. 533, 585 (1964)). And this Court noted that in *Lucas v. Forty-Fourth General Assembly of the State of Colorado*, 377

U.S. 713, 739 (1964), “the Supreme Court recognized that there is a need to determine whether the decision shall be made applicable to an imminent election.” *Hadley*, 460 S.W.2d at 2. The U.S. Supreme Court’s equitable doctrines were paramount to this Court’s stay of a new rule close to the election. And this Court recognized and affirmed those doctrines for Missouri.

And since the time of *Reynolds* and *Lucas*, the U.S. Supreme Court has only provided more guidance on how courts should exercise judicial restraint in altering the rules for quickly approaching elections.³ The U.S. Supreme Court has expressed concerns that “late-breaking, court-ordered rule changes can result in voter confusion and consequent incentive to remain away from the polls, and thus undermine the [c]onfidence in the integrity of our electoral processes essential to the functioning of participatory democracy.” *Bost v. Ill. State Bd. of Elecs.*, 607 U.S. ----, 146 S. Ct. 513, 521 (2026) (quotation omitted). As Justice Kavanaugh has put it, and as *Amicus* Director Bahr’s experience confirms:

The [U.S. Supreme] Court’s precedents recognize a basic tenet of election law: When an election is close at hand, the rules of the road should be clear and settled. That is because running a statewide election is a complicated endeavor. Lawmakers initially must make a host of difficult decisions about how best to structure and conduct the election. Then, thousands of state and local officials and volunteers must participate in a massive coordinated effort to implement the lawmakers’ policy choices on the ground before and during the election, and again in counting the votes afterwards. And at every step, state and local officials must communicate to voters how, when, and where

³ Today, this doctrine is also known as the *Purcell* doctrine based on the decision *Purcell v. Gonzales*, 549 U.S. 1 (2006).

they may cast their ballots through in-person voting on election day, absentee voting, or early voting.

Even seemingly innocuous late-in-the-day judicial alterations to state election laws can interfere with administration of an election and cause unanticipated consequences. If a court alters election laws near an election, election administrators must first understand the court's injunction, then devise plans to implement that late-breaking injunction, and then determine as necessary how best to inform voters, as well as state and local election officials and volunteers, about those last-minute changes.

Democratic Nat'l Comm. v. Wis. State Legislature, 141 S. Ct. 28, 31 (2020) (Mem) (Kavanaugh, J., concurring). “[J]udicial restraint” in this area “not only prevents voter confusion but also prevents election administrator confusion—and thereby protects the State’s interest in running an orderly, efficient election and in giving citizens (including the losing candidates and their supporters) confidence in the fairness of the election.” *Id.* (citation omitted).

Based on these principles, the U.S. Supreme Court has also rejected challenges to congressional redistricting maps enacted in advance of the 2024 and 2026 congressional elections.⁴ For example, in *Abbott v. League of United Latin American Citizens*, 607 U.S. ----, 146 S. Ct. 418 (2025), the U.S. Supreme Court granted Texas’ request to stay a lower court’s order that would require Texas to revert to its old congressional redistricting map

⁴ The U.S. Supreme Court noted: “With an eye on the upcoming 2026 midterm elections, several States have in recent months redrawn their congressional districts in ways that are predicted to favor the State’s dominant political party. Texas adopted the first new map, then California responded with its own map for the stated purpose of counteracting what Texas had done. North Carolina followed suit, and other States are also considering new maps.” *Abbott*, 146 S. Ct. at 419. Missouri certainly falls in this category.

because of the impending 2026 election. *Id.* at 419-20. The Court did so even though it was only December 2025, even though the candidate filing period for the 2026 election had yet to close, and even though the primary election was about four months away. *League of United Latin Am. Citizens v. Abbott*, 809 F. Supp. 3d 502, 598, 600 (W.D. Tex. 2025), *summarily reversed*, *Abbott v. LULAC*, No. 25-845, 2026 WL 1127246 (Apr. 27, 2026) (Mem) (noting the district court issued its November 18, 2025, ruling “well before the candidate-filing deadline of December 8” and “about four months” from the primary election on March 3, 2026).

In granting the stay, the U.S. Supreme Court in *Abbott* also rejected the lower court’s argument that any expedited timeline was the State’s fault—not the challengers’—and therefore the equities weighed in the challengers’ favor. 146 S. Ct. at 419 (reversing lower court’s determination and holding that Texas “made a strong showing . . . that the equities and public interest favor it”); *League of United Latin Am. Citizens*, 809 F. Supp. 3d at 600 (arguing that the equities favored the challengers because of the State’s intentional actions close to the election). This same rejected argument is one the Plaintiffs-Appellants make here.

Likewise in *Merrill v. Milligan*, 142 S. Ct. 879 (2022) (Mem), the U.S. Supreme Court stayed a district court’s January 24, 2022, preliminary injunction of a congressional redistricting map. *Id.* The district court declined to stay the order because “the primary election [would not] occur [until] May 24, 2022, approximately four months” later. *Singleton v. Merrill*, No.: 2:21-cv-1291-AMM, No.: 2:21-cv-1530-AMM, 2022 WL

272636, at *11 (N.D. Ala. Jan. 27, 2022). But the Supreme Court rejected this argument when it stayed the case. *Merrill*, 142 S. Ct. 879; *see also id.* (Kavanaugh, J., concurring).

Finally, and most starkly, in *Callais v. Landry*, 732 F. Supp. 3d 574 (W.D. La. 2024), the district court permanently enjoined a congressional redistricting map as unconstitutional *over six months* before the open primary election, and *over two months* from the date the candidate qualifying period even opened. *2024 Elections Calendar*, LA. SEC’Y OF STATE, <https://perma.cc/4VPB-HWY3>. Still, the Supreme Court stayed issuance of the order for the 2024 election, citing these same principles. *Robinson v. Callais*, 144 S. Ct. 1171 (2024) (Mem).

Here, by contrast, the State is on a more compressed timeline. The primary election is on August 4, 2026—which is just over three months away and closer than the elections in *Callais*, *Abbott*, and *Merrill*. *See 2026 Missouri Election Calendar, supra*. Unlike the deadlines in those recent Supreme Court cases, the statutory deadline for the candidate filing period has already passed. *Id.* Primary election campaigns are already well underway. The final certification date is quickly approaching. *Id.* And as noted, election officials have very little time to prepare everything in advance of that deadline. *See supra* Part I.B. In short, “the election machinery already is in operation.” *Hadley*, 460 S.W.2d at 3. And here, unlike in *Callais*, *Abbott*, *Merrill*, or *Hadley*, the challengers do not suggest, nor has any court decided, that the law in any way violates a party’s fundamental political rights under the Fourteenth Amendment or Voting Rights Act. Rather, the challengers seek to impose a stay in advance of a statewide vote. This case presents an even stronger argument for the Court to decline to intervene than recent Supreme Court decisions and this Court’s own

decision in *Hadley*. Accordingly, this Court should not impose any changes to the election machinery in advance of the August primary.

C. The Court Should Reject Plaintiff-Appellants' *Amici*'s Arguments.

Amicus People Not Politicians (“PNP”) primarily argues that these equitable principles do not apply because the new statute enacting the congressional redistricting map is a bill, not a law. *Amicus* PNP Brief at 33-34. *Amicus* claims whether HB1 is a bill or a law is “a legal question for the court to decide.” *Id.* at 34 (citation omitted). But this Court conclusively answered this question just one month ago in a case where *Amicus* PNP’s attorneys represented the plaintiffs-appellants. There, this Court held that HB1 became a law when it was signed by the governor. *Luther v. Hoskins*, 730 S.W.3d 567, 570 (Mo. banc 2026) (“In September 2025, the Missouri General Assembly enacted HB 1. HB 1 repealed the congressional districts established in 2022 and established new congressional districts without the certification of a new census to the governor. The governor signed HB 1 into law.”); *id.* at 572-73 (discussing that HB1 is a “statute”). And there, this Court repeatedly affirmed “the General Assembly’s plenary legislative power to enact HB 1.” *Id.* at 574; *see also id.* at 569 (affirming the “the General Assembly’s plenary power to legislate congressional districts”).

Furthermore, just one month before the attorneys for *Amicus* PNP submitted their brief in this case, those same attorneys represented the *Luther* plaintiffs-appellants and argued that HB1 was unconstitutional. *Id.* at 569. But by their own logic, if HB1 was just a bill, they never could have raised that argument in *Luther*. Courts do not opine on the constitutionality of proposals that have yet to become laws. *See, e.g., Missourians to*

Protect the Initiative Process v. Blunt, 799 S.W.2d 824, 827 (Mo. banc 1990) (“Courts do not sit in judgment on the wisdom or folly of proposals. Neither will courts give advisory opinions as to whether a particular proposal would, *if adopted*, violate some superseding fundamental law, such as the United State Constitution.” (citation omitted)); *Calzone v. Ashcroft*, 559 S.W.3d 32, 35 (Mo. App. W.D. 2018) (holding that there is “no justiciable controversy ripe for adjudication” until a proposal “becomes law” (citation omitted)). And yet, this Court conclusively determined that HB1 is a law, reached the merits of the declaratory judgment action, and held that HB1 is constitutional without flagging any concerns about ripeness or an advisory opinion. *See generally Luther*, 730 S.W.3d 567. Attorneys for *Amicus* PNP cannot now change their tune simply because they lost their prior challenge.

And this Court’s decision in *Luther* comports with the Missouri Constitution. The one Missouri constitutional provision that discusses congressional redistricting says:

When the number of representatives to which the state is entitled in the House of the Congress of the United States under the census of 1950 and each census thereafter is certified to the governor, the general assembly shall by law divide the state into districts corresponding with the number of representatives to which it is entitled, which districts shall be composed of contiguous territory as compact and as nearly equal in population as may be.

MO. CONST. ART. III, § 45. It never says the law only goes into effect upon approval by referendum. And the Constitution further provides:

Every bill which shall have passed the house of representatives and the senate shall be presented to and considered by the governor, and, within fifteen days after presentment, he shall return such bill to the house in which it originated endorsed

with his approval or accompanied by his objections. **If the bill be approved by the governor it shall become a law.**

MO. CONST. ART. III, § 31 (emphasis added). As such, the moment the Governor signed HB1, it became law—just as this Court determined a couple weeks before *Amicus* PNP filed its brief in this case. *Luther*, 730 S.W.3d at 570.

Finally, the principles from *Hadley* and *Purcell* are not just concerned with enjoining election statutes. For example, *Hadley*, *Callais*, *Abbott*, and *Merrill* all stayed *court orders*—not statutes. And some of those court orders were preliminary, meaning they were not final judgments. *See, e.g., Merrill*, 142 S. Ct. at 879 (staying preliminary injunction order); *Abbott*, 146 S. Ct. at 419-20 (same).

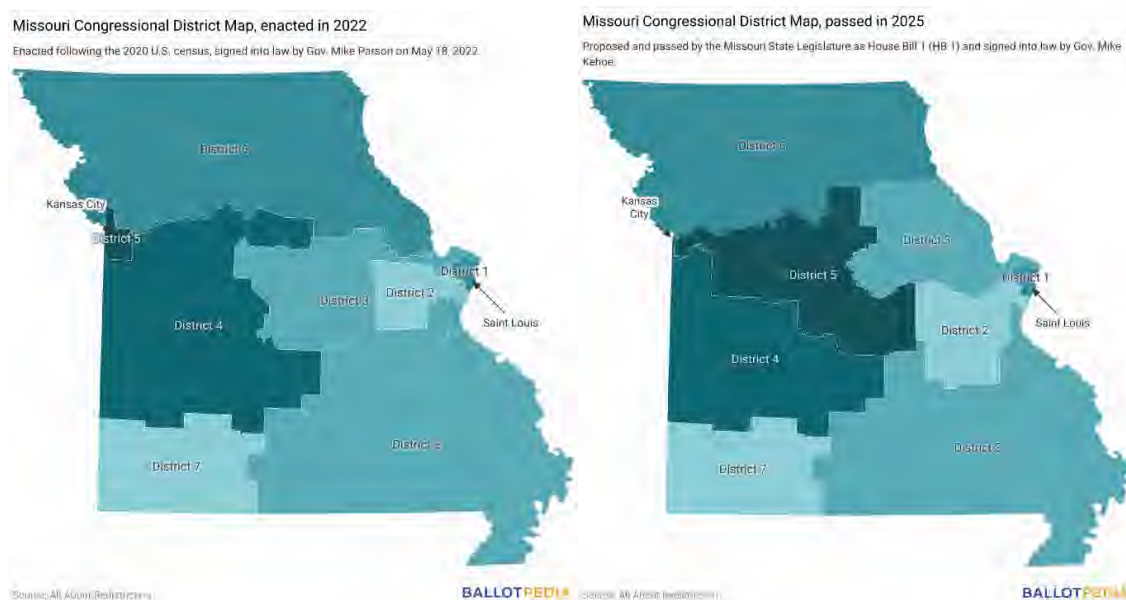
Amicus PNP also argues that the issue in this case “is one of general applicability – does submission of a referendum prevent a referred bill from going into effect? It has *nothing* to do with ‘election law.’” *Amicus* PNP Brief at 32. But Plaintiffs-Appellants cannot evade these principles of equity by styling their complaint in the broadest terms possible. This challenge affects the orderly administration of a federal election, plain and simple, so the same principles apply. The equities that concerned this Court in *Hadley*, for example, had nothing to do with either the merits or the cause of action. This Court accepted that the U.S. Supreme Court was right on the merits but nonetheless determined that the equities counseled in favor of abiding by the prior redistricting plan for the next election. *Hadley*, 460 S.W.2d at 2. And the Court did not evaluate the underlying cause of action in doing so. Rather, it determined “that the overriding public interest in the orderly operation of respondent and other junior college districts in Missouri require[d], and this

court so order[ed], that the elections of trustees of said districts scheduled in April, 1970, be held under the present provisions” of law. *Id.* at 3 (emphasis added). Accordingly, in considering whether these principles apply, this Court should not concern itself with whether the cause of action qualifies as an election law challenge or not. Rather, it should look to the timeline and refrain from imposing any rule that would upend the orderly administration of the August 2026 primary election.

Amicus PNP also contends that the State’s argument that “it is already too late for a judicial order changing Missouri’s congressional map before the 2026 elections,” has no weight because this emanates from the *Purcell* principle, which per *Amicus* “has zero relevance or application to state courts deciding matters of state law.” *Amicus* PNP Brief at 32. But as discussed above, this idea does not just emanate from *Purcell*, but from Missouri law—including this very Court’s decision in *Hadley*, and this Court’s stated reliance on Supreme Court precedent in this area. *See supra* Part II.A-B.

Finally, *Amicus* PNP notes that in 2022, the candidate filing period closed before the General Assembly delivered the redistricting plan to the Governor to undermine concerns about the administration of the election. *Amicus* PNP Brief at 32. But in 2022, the changes between the newly enacted map and the previous map were not as dramatic as they are here. And everyone knew that the map enacted after the 2010 census could not constitutionally be used for the 2022 election due to the recent census, which was certified to the Governor in August 2021. MO. CONST. ART. III, § 45 (requiring General Assembly to redistrict after census is certified); *Luther*, 730 S.W.3d at 569-70. By contrast, as demonstrated by a side-by-side comparison of the maps below, the changes that Plaintiffs-

Appellants ask local election officials to undertake on short notice are unanticipated and substantial for several districts, and reverting to those old maps would create chaos throughout the State.



Redistricting in Missouri after the 2020 census, BALLOTPEDIA, <https://perma.cc/2NHF-SHMY>. Voters and candidates have come to rely on HB1 (the 2025 map) and have tailored their behavior and campaigns accordingly.

As even *Amicus* Brianna Lennon notes, a stay of Missouri’s current law in advance of the August primary “will result in chaos, confusion, and unnecessary expense.” *Amicus* Brianna Lennon Brief at 7; *see also id.* at 14 (noting that administration of the prior map “will be complicated and costly”); *id.* at 16 (“Last minute changes in how elections are administered can themselves cause confusion and chaos that allows election mis- and disinformation to metastasize.” (footnote omitted)). Her concerns about voter confusion now would be greatly magnified if the entire map shifted so close to the election,

considering that HB1 has been on the books since September 2025. *Cf. id.* at 14-15. Even if 300,000 voters expect to vote under the previously enacted map, HB1 is the current law and, even under Plaintiffs-Appellants' calculation, there are nearly 4 million other voters who did not sign the referendum and therefore do not have that same expectation. As such, this Court should decline to impose such a stay.

D. Missouri Courts Should Not Change the Congressional Map Between the Primary and General Elections.

This Court should also resist any suggestion to change or allow the map to change between the primary and general elections. *See* Amicus Brianna Lennon Brief at 14 (suggesting “the Secretary could allow HB1 to remain in effect through the primary and then suspend it before the general”). Such action would create a new constitutional violation. The Fourteenth Amendment bestows each citizen with the “right . . . to have his vote weighted equally with those of all other citizens in the election.” *Reynolds*, 377 U.S. at 576; *see also id.* at 555 (“[T]he right of suffrage can be denied by a debasement or dilution of the weight of a citizen’s vote just as effectively as by wholly prohibiting the free exercise of the franchise.”). If a State gives some classes of voters a privilege and “den[ies] the privilege to other classes of otherwise qualified voters in similar circumstances, without affording a comparable alternative means to vote,” the State engages in “arbitrary discrimination violative of the Equal Protection Clause.” *Am. Party of Tex. v. White*, 415 U.S. 767, 795 (1974). A citizen’s Fifteenth Amendment right to vote and Fourteenth Amendment right receive equal treatment as other voters apply during primary elections—or any other “[v]oting at the nomination stage.” *Morse v. Republican Party of Va.*, 517 U.S.

186, 211, 218-19 (1996). Thus, excluding voters from the primary election essentially eliminates their right to vote. *Id.* at 211, 218-19.

If shortly after the primary election, the State reassigned voters to districts where they had no say in choosing the nominees for the general election, their votes would carry less weight. One group of voters (those who did not change districts between the primary and general elections) would have had the opportunity to nominate their preferred candidates for the general election. Another group (those who changed districts between the primary and general elections) would have had no such opportunity. This arbitrary, discriminatory treatment thereby would not provide citizens “equal protection of the laws.” U.S. CONST. AMEND. XIV; *see also* *Bush v. Gore*, 531 U.S. 98, 105 (2000) (holding that states have a constitutional “obligation to avoid arbitrary and disparate treatment of the members of its electorate”); *Org. for Black Struggle v. Ashcroft*, 493 F. Supp. 3d 790, 802 (W.D. Mo. 2020) (holding that “different treatment” of voters under Missouri procedural rule, even when it did not pose a “particularly arduous or severe burden,” likely violated the Equal Protection Clause). And it may deprive those citizens of the right to vote. *Morse*, 517 U.S. at 211, 218-19.

Moreover, all the aforementioned concerns about voter confusion, election administration, and fairness to candidates that plague the imposition of a new map in advance of the primary elections would be even worse if the Court imposed a new map between the primary and general elections. The primary elections are set for August 4, 2026. *2026 Missouri Election Calendar*, *supra*. The general election is set for November 3, 2026, less than three months later. *Id.* And the final certification date for the general

election is August 25, 2026—just three weeks after the primary election date. *Id.* That gives election administrators barely any time. It would be practically impossible for these local officials to effectuate this massive change. Plus, the risk of voter confusion would be almost certain given the unusual circumstances. Additionally, the statutory deadline of July 27, 2026, for new party and independent candidates for districts to submit their petitions to the Secretary of State would have already passed. *Id.*; § 115.329, RSMo. There's a risk that candidates, who filed to run in districts where they resided for the primary election, would no longer live in their new districts for the general election. And candidates who receive nominations via primary elections and qualify to run in the general election, would have to target entirely new voters. In short, any changes to the districts between the elections would create complete chaos.

CONCLUSION

For the foregoing reasons, this Court should affirm.

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Respectfully submitted,

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CERTIFICATION

I, Edward D. Greim, hereby certify:

- (1) This brief includes the information required by Missouri Supreme Court Rule 55.03.
- (2) A true and correct copy of the foregoing was served on opposing parties through the Missouri e-Filing system, which serves all registered attorneys of record. MO. SUP. CT. R. 103.08(a).
- (3) The foregoing brief complies with the limitations contained in Missouri Supreme Court Rule 84.06(b).
- (4) There are 7,565 words in this brief, excluding the cover, any certificate required by Missouri Supreme Court Rule 84.06(c), signature block, and appendix. MO. SUP. CT. R. 84.06. The undersigned relied on the word count of the word-processing system used to prepare the brief.

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