

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
MISSOURI STATE CONFERENCE)
111 W HIGH)
JEFFERSON CITY, MO 65102)

PATRICIA A. JONES)
6022 BROOKLYN)
KANSAS CITY, MO 64130)
TRACI L. WILSON KLEEKAMP)
2905 GREENBRIAR DR.)
COLUMBIA, MO 65203)

Plaintiff,)

v.)

Case No.)

MICHAEL KEHOE in his official)
capacity as Governor of Missouri)

REQUEST FOR TEMPORARY)
RESTRAINING ORDER AND)
PRELIMINARY INJUNCTION)

Serve: Office of the Governor)
State Capitol, Rm. 216)
201 W Capitol Ave.)
Jefferson City, MO 65101)

ANDREW BAILEY in his official)
capacity as Attorney General of Missouri)

Serve: Office of the Attorney General)
227 East High St.)
Jefferson City, MO 65101)

CINDY O'LAUGHLIN in her official)
capacity as State Senator and President)
Pro Tem of the Senate)

Serve: Office of the Pro Tem)
State Capitol, Rm. 326)
201 W Capitol Ave.)
Jefferson City, MO 65101)

**JON PATTERSON, in his official
capacity as State Representative and
Speaker of the House**

**Serve: Office of the Speaker
State Capitol, Rm. 308
201 W Capitol Ave.
Jefferson City, MO 65101
Defendants**

**VERIFIED PETITION FOR DECLARATORY JUDGMENT
AND INJUNCTIVE RELIEF**

Comes now Plaintiffs the National Association for the Advancement of Colored People Missouri State Conference (“NAACP MO”), Patricia A. Jones (“Jones”), and Traci Wilson-Kleekamp (“Wilson-Kleekamp”) by and through undersigned counsel and for their Petition against Defendants State of Missouri (“State”), Governor Mike Kehoe (“Governor”), Attorney General Andrew Bailey (“Attorney General”), Senator and President Pro Tem of the Senate Cindy O’Laughlin (“Pro Tem”), and Representative and Speaker of the House Jon Patterson (“Speaker”), states as follows:

I. INTRODUCTION

Plaintiffs bring this Verified Petition for Declaratory Judgment and Injunctive Relief, challenging the constitutionality of the Proclamation issued by the Governor on August 29, 2025, (“Proclamation”) (Attached as Exhibit A) calling the legislature into an extraordinary session. The Proclamation purportedly was issued under the authority of Article IV, Section 9 of the Missouri Constitution and contains two general topic areas of consideration for the General Assembly – a new Congressional Map drafted under Article III, Section 45 and new laws relating to initiative petitions. The Governor also issued a Press Release (Attached as Exhibit B) to explain his

Proclamation which included a proposed new Congressional Map (Attached as Exhibit C) and included reasoning for the special session different than that stated in the Proclamation.

This appears to be a case of first impression in Missouri. Article IV, Section 9 of the Missouri Constitution grants the Governor authority to convene the legislature "on extraordinary occasions." Although the question of what an "extraordinary occasion" under the Missouri Constitution has not been tested in the Courts, no governor has ever before convened the legislature based on similar facts.

Neither of the matters designated in the Proclamation reach the level of extraordinary occasion required by Article IV, Section 9. Additionally, neither Article IV, Sec. 9 nor Article III, Section 45 expressly grant the Governor the authority to request a new Congressional Map from the General Assembly without action from Congress.

Allowing an extraordinary session of the legislature when the constitutionality of the Proclamation is in doubt creates irreparable harm in that the additional costs attributable to the legislative session is in excess of \$25,000 per day based on the per diem and mileage payments authorized by Sections 21.140 and 21.145. Additional irreparable harms would be created by the undue burden on interested parties to travel to Jefferson City for the public hearings and to participate in the legislative process outside of the usual timeframe, uncertainty in the district boundaries both for constituents and anyone interested in filing for office, and the undue burden on legislators created by an early return to Jefferson City.

Plaintiffs seek a declaratory judgment that the Governor's Proclamation is unconstitutional and a temporary restraining order and preliminary and permanent injunctions against the convening of the legislature for an extraordinary session based upon said Proclamation.

II. PARTIES

1. Plaintiff National Association for the Advancement of Colored People Missouri State Conference (“NAACP MO”) is an affiliate of the National Association for the Advancement of Colored People, a Delaware nonprofit corporation in good standing that conducts business in Missouri through its Missouri State Conference. The National Association for the Advancement of Colored People is the oldest and largest civil rights organization in the nation.

2. NAACP MO has members in over 35 of its Units across Missouri. The mission of the NAACP is to achieve equity, political rights, and social inclusion by advancing policies and practices that expand human and civil rights, eliminate discrimination, and accelerate the well-being, education, and economic security of Black people and all persons of color.

3. Plaintiff Patricia A. Jones is a natural person, a resident and citizen of Jackson County, Missouri, and these United States.

4. Plaintiff Traci. L. Wilson Kleekamp is a natural person, a resident and citizen of Jackson County, Missouri, and these United States.

5. The Honorable Michael Kehoe is a natural person, the duly elected and currently serving Governor of Missouri, sued in his official capacity as a constitutional officer of the State of Missouri, whose official office is in Cole County.

6. The Honorable Andrew Bailey is a natural person, the duly elected and currently serving Attorney General of Missouri, sued in his official capacity as a constitutional officer of the State of Missouri, whose official office is in Cole County.

7. The Honorable Cindy O’Laughlin is a natural person, the duly elected and currently serving President Pro Tem of the Missouri Senate, sued in her official capacity as a constitutional officer of the State of Missouri, whose official office is in Cole County.

8. The Honorable Jon Patterson is a natural person, the duly elected and currently serving Speaker of the Missouri House, sued in his official capacity as a constitutional officer of the State of Missouri, whose official office is in Cole County.

III. JURISDICTION AND VENUE

9. The Court has jurisdiction over this action pursuant to Article V, Section 14 of the Missouri Constitution and Section 527.010, RSMo.

10. Venue is proper in this Court pursuant to Section 508.010.2(1), RSMo, because Defendants officers of the State of Missouri sued in their official capacities whose offices are located in Cole County, Missouri.

IV. FACTS COMMON TO ALL COUNTS

11. In April 2021, the US Census Bureau published the results of the decennial census and its reapportionment calculations, starting the process of reapportionment and redistricting in all 50 States.

12. Missouri's Congressional Redistricting is governed by Article III, Section 45 of the Missouri Constitution and requires the General Assembly to pass a law dividing the state into districts composed of contiguous territory as compact and as nearly equal in population as may be.

13. On March 1, 2022, then Representative Dan Shaul introduced redistricting legislation, House Bill 2909 entitled "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." (Truly Agreed and Finally Passed Version Attached as Exhibit D).

14. On May 9, 2022, House Bill 2909 was passed by the Missouri House by a vote of 101 Ayes to 47 Noes. The Emergency Clause was adopted by a vote of 114 Ayes to 34 Noes.

15. On May 11, 2022, House Bill 2909 was Truly Agreed and Finally Passed by the Senate by a vote of 22 Ayes to 11 Noes. The Emergency Clause was adopted by a vote of 29 Ayes to 4 Noes.

16. On May 18, 2022, House Bill 2909 was delivered to the Governor and was signed into law by the Governor on the same day.

17. House Bill 2909 went into effect on May 18, 2022, and applied to the 118th Congress election which was to be held in November 2022.

18. On November 8, 2022, an election for US Representatives was held with the district boundaries being those described in House Bill 2909.

19. On November 5, 2024, an election for US Representatives was held with the district boundaries being those described in House Bill 2909. This was the second election using that district maps approved by the legislature and signed into law by the Governor.

20. On August 29, 2025, the Governor issued a Press Release announcing a Proclamation convening an extraordinary session of the legislature under Article IV, Section 9 for the purpose of enacting legislation establishing revised congressional districts and amending the state's initiative petition process.

21. The Press Release contained several reasons for the Proclamation including "to ensure our districts and Constitution truly put Missouri values first."

22. The Press Release also contained a proposed "Missouri First Map" outlining a new set of Congressional Districts.

23. The "Missouri First Map" is substantially different than the districts passed into law by House Bill 2909.

24. The Proclamation convening the legislature into an extraordinary session lays out eleven “whereas” statements justifying the reasoning for the Proclamation.

“WHEREAS, the General Assembly has adjourned its regular legislative session without having enacted new congressional district boundaries; and

WHEREAS, Article III, Section 45 of the Missouri Constitution authorizes the General Assembly to divide the state into districts for the United States House of Representatives; and

WHEREAS, the State of Missouri's current congressional district map may be vulnerable to a legal challenge under the Voting Rights Act and the Fourteenth Amendment, due to a lack of compactness in certain districts; and

WHEREAS, our congressional delegation should reflect the values of Missourians; and

WHEREAS, congressional candidate filing for the 2026 election cycle begins on February 24, 2026; and

WHEREAS, legislation to establish new congressional districts for the State of Missouri cannot be accomplished in the 2026 Regular Session; and

WHEREAS, the failure to establish new congressional districts constitutes an extraordinary occasion that warrants immediate legislative action; and

WHEREAS, the swift and efficient resolution of this matter is necessary to prepare for the upcoming election cycle and to provide certainty for voters; and

WHEREAS, a fair and transparent initiative petition process is essential for the citizens of the State of Missouri to propose and enact laws; and

WHEREAS, the current initiative petition process may be vulnerable to foreign and out of-state influence; and

WHEREAS, certain ballot initiatives can be confusing to voters and lead to unintended consequences; and”

(Exhibit A, P. 1)

25. The “whereas” statements generally include the adjournment of the General Assembly without passage of new congressional district boundaries (although no new congressional maps are required until after the 2030 census) and the speculation that the current congressional district map may be vulnerable to a legal challenge from unnamed persons for unexplained reasons.

26. Other “whereas” statements generally relate to the need for a “fair and transparent” initiative petition process free from unspecified influence from unnamed foreign sources.

27. Together these eleven statements provide the official justification that an extraordinary occasion exists.

28. The Proclamation then convenes the legislature beginning at Noon on Wednesday, September 3, 2025, for two purposes:

1. To enact legislation to establish new congressional districts for the State of Missouri.

2. To enact legislation to amend the state's initiative petition process as follows:

a. To ban foreign nationals from contributing to committees for or

against a statewide ballot measure; and

- b. To establish a criminal election offense for fraudulently signing or gathering signatures for a statewide ballot measure; and
- c. To provide that a statewide ballot measure be passed only if a majority of voters statewide and a majority of voters in each congressional district vote to adopt the proposed measure; and
- d. To require that before a statewide ballot measure is certified for signatures to be gathered, there shall be an opportunity for public comment; and
- e. To require that the full text of a statewide ballot measure be printed and available to voters at all election sites and polling places.

(Exhibit A.P. 2)

29. The US Census Bureau has not issued new apportionment calculations since the April 2021 publication.

30. On information and belief, the Governor has not received certified numbers from the House of the Congress of the United State triggering the processes of Article III, Section 45 after May 18, 2022, when the current district boundaries when into effect with House Bill 2909.

31. On information and belief, only two challenges to the district boundaries passed in House Bill 2909 have been filed, and neither was pursued to conclusion by the plaintiffs. See *Berry v. Ashcroft*, U.S. District Court for the Eastern District of Missouri, St. Louis Division - No. 4:22-cv-465; *Thomas v. Missouri*, Missouri Circuit Court, Cole County - No. 22AC-CC00222.

32. On December 1, 2024, then Senator Ben Brown introduced Senate Bill 152 entitled “AN ACT To amend chapter 130, RSMo, by adding thereto six new sections relating to campaign finance.” (Truly Agreed and Finally Passed Version Attached as Exhibit E).

33. On March 27, 2025, Senate Bill 152 was passed by the Missouri Senate by a vote of 28 Ayes to 2 Noes.

34. On May 15, 2025, Senate Bill 152 was Truly Agreed and Finally Passed by the House by a vote of 94 Ayes to 47 Noes.

35. On July 9, 2025, Senate Bill 152 was signed into law by the Governor.

36. Senate Bill 152 went into effect on August 28, 2025.

37. Senate Bill 152 contained several provisions which restricted donations from foreign nationals and the use of foreign funds for the purposes of ballot measures.

38. Missouri statutes make it a crime to fraudulently gather signatures for an initiative petition under Section 116.090 RSMo. This section was amended in 2013.

39. Missouri provides an opportunity for public comment on every initiative petition filed with the Secretary of State under Section 116.153 and 116.334 RSMo. These sections were amended in 2014 and 2025 respectively.

40. Missouri requires copies of the full text of each statewide ballot measure to be made available at each polling place under Section 116.290 RSMo. This section was amended in 1983.

41. All but one of the actions deemed necessary by the Governor in the Proclamation appear to have already occurred.

42. The only matter designated by the proclamation which has not already been enacted is in part 2 subsection c of the proclamation and is "To provide that a statewide ballot measure be passed only if a majority of voters statewide and a majority of voters in each congressional district vote to adopt the proposed measure..."

43. There has been ample time for potential challenges to the district boundaries established by House Bill 2909 and none has been forthcoming.

V. CAUSES OF ACTION

COUNT I – DECLARATORY JUDGEMENT THE GOVERNOR’S PROCLAMATION FAILS TO STATE AN EXTRAORDINARY OCCASION AS REQUIRED BY ARTICLE IV SECTION 9.

44. Plaintiff incorporates by reference all proceeding paragraphs of this Petition as if fully set forth herein.

45. Plaintiff is requesting a declaratory judgment under Sections 527.010 and 527.020 RSMo.

46. Article IV, Section 9 of the Missouri Constitution provides:

The governor shall, at the commencement of each session of the general assembly, at the close of his term of office, and at such other times as he may deem necessary, give to the general assembly information as to the state of the government, and shall recommend to its consideration such measures as he shall deem necessary and expedient. *On extraordinary occasions he may convene the general assembly by proclamation, wherein he shall state specifically each matter on which action is deemed necessary.* (Emphasis added).

47. Since 1944, there have been at least 33 extraordinary sessions convened by the Governor.

48. The matters designated by the Governor for these extraordinary sessions range from emergency appropriations to motor vehicle sales tax.

49. Article, IV, Section 9 requires an “extraordinary occasion” before the Governor can convene the legislature.

50. The definition of and parameters around the term “extraordinary occasion” is a question of first impression for this Court.

51. Where there is no specific definition of a legislative or Constitutional term, the ordinary meaning canon of legislative interpretation applies.

52. The term “extraordinary” in common usage means:

a. Out of the ordinary; exceeding the usual, average, or normal measure or degree; beyond or out of the common order, method or rule; not usual, regular, or of a customary kind; remarkable; uncommon; rare; employed for an exceptional purpose or on a special occasion. (Black’s Law Dictionary Sixth Edition)

b. Beyond what is common or usual: remarkable. (Webster’s II Revised Edition)

53. The term “occasion” in common usage means:

a. That which provides an opportunity for the causal agency to act. Meaning not only particular time but carrying idea of opportunity, necessity or need, or even cause in a limited sense. Condition of affairs; juncture entailing need; exigency; or juncture affording ground or reason for something. (Black’s Law Dictionary Sixth Edition)

b. An event, especially a notable event. The time at which something occurs. A favorable moment: opportunity. Something that brings on an event. A need created by particular circumstances. (Webster’s II Revised Edition)

54. Taken together the phrase “extraordinary occasion” would appear to mean a set of circumstances that require action or bring about an event.

55. Nothing in the Governor’s Proclamation indicates a change in Missouri’s circumstances that requires action.

56. In fact, all but one of the matters designated by the Proclamation are already law and have already been acted upon by the General Assembly. Thus, the Proclamation fails because,

none of the actions are “necessary” as required by Article, IV, Section 9. Nothing sought in the Proclamation is required for the next election for US Representatives to take place in 2026.

57. The Governor references the potential for litigation over the constitutionality of the congressional boundaries but provides no support for this claim. Furthermore, the mere threat of litigation would not require redrawing district maps. Such action would be “necessary” only if a litigant actually initiated a lawsuit, prevailed against the State, and Missouri was ordered by a court to redraw district lines. None of that has transpired. There also is no allegation by anyone that the maps as they exist violate the one-person one-vote principal. Thus, there is no legitimate threat to the constitutionality of the current maps.

58. A review of the history of extraordinary sessions after the 1971 move to annual legislative sessions will likely show a trend away from the original purpose of emergency spending and interim changes to Federal requirements.

59. The Governor in recent years has begun calling extraordinary sessions on a regular basis to designate matters the legislature addressed but failed to pass during their regular session. That is not the case here. The last time the legislature addressed drawing district lines was when it was required to do so after the results of the 2020 Census.

60. Broad discretion given to the Governor under the doctrine of separation of powers does not need to be limitless.

61. The separation of powers doctrine does not, for example, require the Courts to allow the executive to act without legislative authority or in violation of the Constitution.

62. In this instance, the Court should require a minimum showing of some set of circumstances or events outside of the normal course of business to justify the convening of the legislature in an extraordinary session under Art. IV Sec. 9.

WHEREFORE, Plaintiffs respectfully request the Court:

- A. Enter judgment declaring the Governor's Proclamation to be insufficient under Article IV, Section 9;
- B. Grant a permanent injunction prohibiting Defendants Pro Tem and Speaker from calling the legislature into session based on the Proclamation;
- C. An award of costs under Section 527.100; and
- D. Such other relief as is just and proper.

**COUNT II – DECLARATORY JUDGEMENT
ARTICLE III SECTION 45 DOES NOT GRANT AUTHORITY TO
CREATE NEW CONGRESSIONAL BOUNDARIES WITHOUT A
DECENNIAL CENSUS CERTIFICATION.**

63. Plaintiff incorporates by reference all proceeding paragraphs of this Petition as if fully set forth herein.

64. Plaintiff is requesting a declaratory judgment under Sections 527.010 and 527.020 RSMo.

65. Article III, Section 45 of the Missouri Constitution provides:

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.

66. As stated above, the Missouri General Assembly followed the procedure required by Article III, Section 45 and passed a set of congressional boundaries which went into effect on May 18, 2022.

67. No new census has been conducted, nor has any reapportionment bill been passed by the United States Congress.

68. The population calculation and the apportionment of representatives to which Missouri is entitled is exactly the same as it was in 2022.

69. Two elections have now occurred based on the congressional boundaries passed in House Bill 2909.

70. No one has sustained a challenge to the congressional boundaries based on either Constitutional or Voting Rights Act claims.

71. A Court has not invalidated the existing congressional boundaries.

72. There is no indication that any change in circumstance has prompted the Governor to designate this matter for an extraordinary session under Article IV, Section 9.

73. Absent a condition outlined in Article III, Section 45 or some other operation of law, the General Assembly is not authorized to designate new congressional boundaries.

WHEREFORE, Plaintiffs respectfully request the Court:

A. Enter judgment declaring the Governor does not have the authority to designate the matter of redrawing congressional boundaries to the General Assembly under Article IV, Section 9;

B. Enter judgment declaring the General Assembly does not have the authority to act to draw new congressional boundaries outside of the provisions of Article III, Section 45;

C. Grant a permanent injunction prohibiting Defendants Pro Tem and Speaker from calling the legislature into session based on the Proclamation;

D. An award of costs under Section 527.100; and

E. Such other relief as is just and proper.

COUNT III – REQUEST FOR PRELIMINARY INJUNCTION

**THE PROCLAMATION ISSUED BY THE GOVERNOR ON AUGUST 29, 2025 IS
INSUFFICIENT AND THE GENERAL ASSEMBLY MAY
NOT CONVENE PURSUANT TO ITS PROVISIONS.**

74. Plaintiff incorporates by reference all proceeding paragraphs of this Petition as if fully set forth herein.

75. Plaintiff is requesting a preliminary injunction pursuant to section 526.030 RSMo.

76. Injunctions may be granted by the Court under Section 526.030 RSMo in cases where other remedies would not be adequate.

77. A temporary injunction may be granted when it appears the plaintiff is entitled to relief, there is a likelihood of action during pending litigation, and irreparable harm would result, Section 526.050 RSMo.

78. There is no reason to believe that Plaintiffs will not succeed in their claims after full briefing and argument.

79. The Plaintiffs in this case has clearly laid out a series of questions of first impression properly before the Court.

80. There is a certainty of action being taken during the pendency of this case absent an injunction.

81. The legislature has already posted notice of its intent to convene on Wednesday, September 3, 2025, at Noon in accordance with the Governor's Proclamation.

82. Irreparable harm in the form of costs to the taxpayers and undue burden to participants in the process will result absent an injunction.

83. Costs of an extraordinary session are expected to exceed \$25,000 per day based upon the per diem and mileage allowances given to the members of the General Assembly.

84. Additional harms include non-monetary harms such as the undue burden on interested parties to travel to Jefferson City for the public hearings and to participate in the legislative process outside of the usual timeframe, uncertainty in the district boundaries both for constituents and anyone interested in filing for office, and the undue burden on legislators created by an early return to Jefferson City.

85. The costs associated with each day of the legislature's convening cannot be recovered by the taxpayers through any means.

86. The non-monetary harms caused by the legislature's convening cannot be remedied by monetary damages.

87. Absent injunctive relief, Plaintiffs, as taxpayers, will suffer immediate and irreparable harm in the form of additional costs and confusion.

WHEREFORE, Plaintiffs respectfully request the Court:

- A. Issue a preliminary injunction prohibiting Defendants Pro Tem and Speaker from calling the legislature into session based on the Proclamation;
- C. An award of costs under Section 527.100; and
- D. Such other relief as is just and proper.

Respectfully Submitted,



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ATTORNEYS FOR PLAINTIFFS

PROCLAMATION

WHEREAS, the General Assembly has adjourned its regular legislative session without having enacted new congressional district boundaries; and

WHEREAS, Article III, Section 45 of the Missouri Constitution authorizes the General Assembly to divide the state into districts for the United States House of Representatives; and

WHEREAS, the State of Missouri's current congressional district map may be vulnerable to a legal challenge under the Voting Rights Act and the Fourteenth Amendment, due to a lack of compactness in certain districts; and

WHEREAS, our congressional delegation should reflect the values of Missourians; and

WHEREAS, congressional candidate filing for the 2026 election cycle begins on February 24, 2026; and

WHEREAS, legislation to establish new congressional districts for the State of Missouri cannot be accomplished in the 2026 Regular Session; and

WHEREAS, the failure to establish new congressional districts constitutes an extraordinary occasion that warrants immediate legislative action; and

WHEREAS, the swift and efficient resolution of this matter is necessary to prepare for the upcoming election cycle and to provide certainty for voters; and

WHEREAS, a fair and transparent initiative petition process is essential for the citizens of the State of Missouri to propose and enact laws; and

WHEREAS, the current initiative petition process may be vulnerable to foreign and out-of-state influence; and

WHEREAS, certain ballot initiatives can be confusing to voters and lead to unintended consequences; and

WHEREAS, Article IV, Section 9 of the Missouri Constitution authorizes the Governor on extraordinary occasions, to convene the General Assembly by proclamation, specifying each matter requiring action.

NOW, THEREFORE, on the extraordinary occasion that exists in the State of Missouri:

I, MIKE KEHOE, GOVERNOR OF THE STATE OF MISSOURI, pursuant to the authority vested in me as Governor by the Constitution of the State of Missouri, do, by this Proclamation, convene the One Hundred Third General Assembly in the Second Extraordinary Session of the First Regular Session; and

I HEREBY call upon the Senators and Representatives of said General Assembly to meet in the State Capitol in the City of Jefferson at the hour of 12:00 p.m. on Wednesday, September 3, 2025; and

I **HEREBY** state that the action of said General Assembly is deemed necessary concerning each matter specifically designated and limited hereinafter as follows:

1. To enact legislation to establish new congressional districts for the State of Missouri.
2. To enact legislation to amend the state's initiative petition process as follows:
 - a. To ban foreign nationals from contributing to committees for or against a statewide ballot measure; and
 - b. To establish a criminal election offense for fraudulently signing or gathering signatures for a statewide ballot measure; and
 - c. To provide that a statewide ballot measure be passed only if a majority of voters statewide and a majority of voters in each congressional district vote to adopt the proposed measure; and
 - d. To require that before a statewide ballot measure is certified for signatures to be gathered, there shall be an opportunity for public comment; and
 - e. To require that the full text of a statewide ballot measure be printed and available to voters at all election sites and polling places.



IN WITNESS WHEREOF, I have hereunto set my hand and caused to be affixed the Great Seal of the State of Missouri, in the City of Jefferson, on this 29th day of August, 2025.

A handwritten signature in black ink, appearing to read "Mike Kehoe", written over a horizontal line.

MIKE KEHOE
GOVERNOR

ATTEST:

A handwritten signature in black ink, appearing to read "Denny Hoskins", written over a horizontal line.

DENNY HOSKINS
SECRETARY OF STATE

GOVERNOR KEHOE ANNOUNCES SPECIAL SESSION ON CONGRESSIONAL REDISTRICTING AND INITIATIVE PETITION REFORM



(mailto:?)

Special%20Session%20on%20Congressional%20Redistricting%20and%20Initiative%20Petition%20Reform&body=Check
.gov/press-releases/archive/governor-kehoe-announces-special-session-congressional-redistricting-and)

AUGUST 29, 2025

JEFFERSON CITY — Today, Governor Mike Kehoe announced that he has issued a proclamation to convene the General Assembly for a special session to enact legislation establishing updated congressional districts for the State of Missouri and amending the state's initiative petition process.

The One Hundred Third General Assembly will convene for the Second Extraordinary Session of the First Regular Session in Jefferson City on Wednesday, September 3, 2025, at 12:00 p.m.

"Today, I am calling on the General Assembly to take action on congressional redistricting and initiative petition reform to ensure our districts and Constitution truly put Missouri values first," said **Governor Kehoe**. "This is about clarity for voters and ownership of our future, and I hope the legislature will work together to pass our Missouri First Map and critically needed IP reform."

To establish updated congressional districts for the State of Missouri, Governor Kehoe unveiled the **Missouri First Map**, a more compact, contiguous proposed map that was drawn and created by his team in Missouri to be considered by the General Assembly.

Highlights of the Missouri First Map:

- Splits fewer counties and municipalities than the current map.
- Preserves 2 congressional districts as currently drawn.
- Retains every current member of Missouri's congressional delegation in their current districts.

To view images of the map, **click here** (<https://governor.mo.gov/media/pdf/missouri-first-map>).

"Missourians are more alike than we are different, and our Missouri values, across both sides of the aisle, are closer to each other than those of the extreme Left representation of New York, California, and Illinois," said **Governor Kehoe**. "Missouri's conservative, common-sense values should be truly represented at all levels of government, and the Missouri First Map delivers just that."

Governor Kehoe's call also includes enacting legislation to amend the state's initiative petition process with legislation that does the following:

- Bans foreign nationals from contributing to committees for or against a statewide ballot measure.
- Establishes a criminal election offense for fraudulently signing or gathering signatures for a statewide ballot measure.
- Provides that a statewide ballot measure be passed only if a majority of voters statewide and a majority of voters in each congressional district vote to adopt the proposed measure.
- Requires that before a statewide ballot measure is certified for signatures to be gathered, there shall be an opportunity for public comment.
- Requires that the full text of a statewide ballot measure be printed and available to voters at all election sites and polling places.

"For far too long, Missouri's Constitution has been the victim of out-of-state special interests who deceive voters to pass out-of-touch policies," said **Governor Kehoe**. "It's time we give voters a chance to protect our Constitution."

To view Governor Kehoe's video announcement on the special session, **click here** (<https://x.com/GovMikeKehoe/status/1961538399229075941>).

Exhibit B
Exhibit A, Page 0021

The special session proclamation will be uploaded at **this link**
(<https://governor.mo.gov/actions/proclamations?page=0>).

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CONTACT US

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OUR OFFICE

Governor's Bio (<https://governor.mo.gov/bio>)
Press Releases (<https://governor.mo.gov/press-releases>)
Media Advisories (<https://governor.mo.gov/media-advisories>)
Legislative Actions (<https://governor.mo.gov/legislative-actions>)
Executive Orders (<https://governor.mo.gov/executive-orders>)

POPULAR SERVICES

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GOVERNMENT

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MIKE KEHOE
GOVERNOR OF MISSOURI

Michael Kehoe

Missouri FIRST Map

Exhibit C

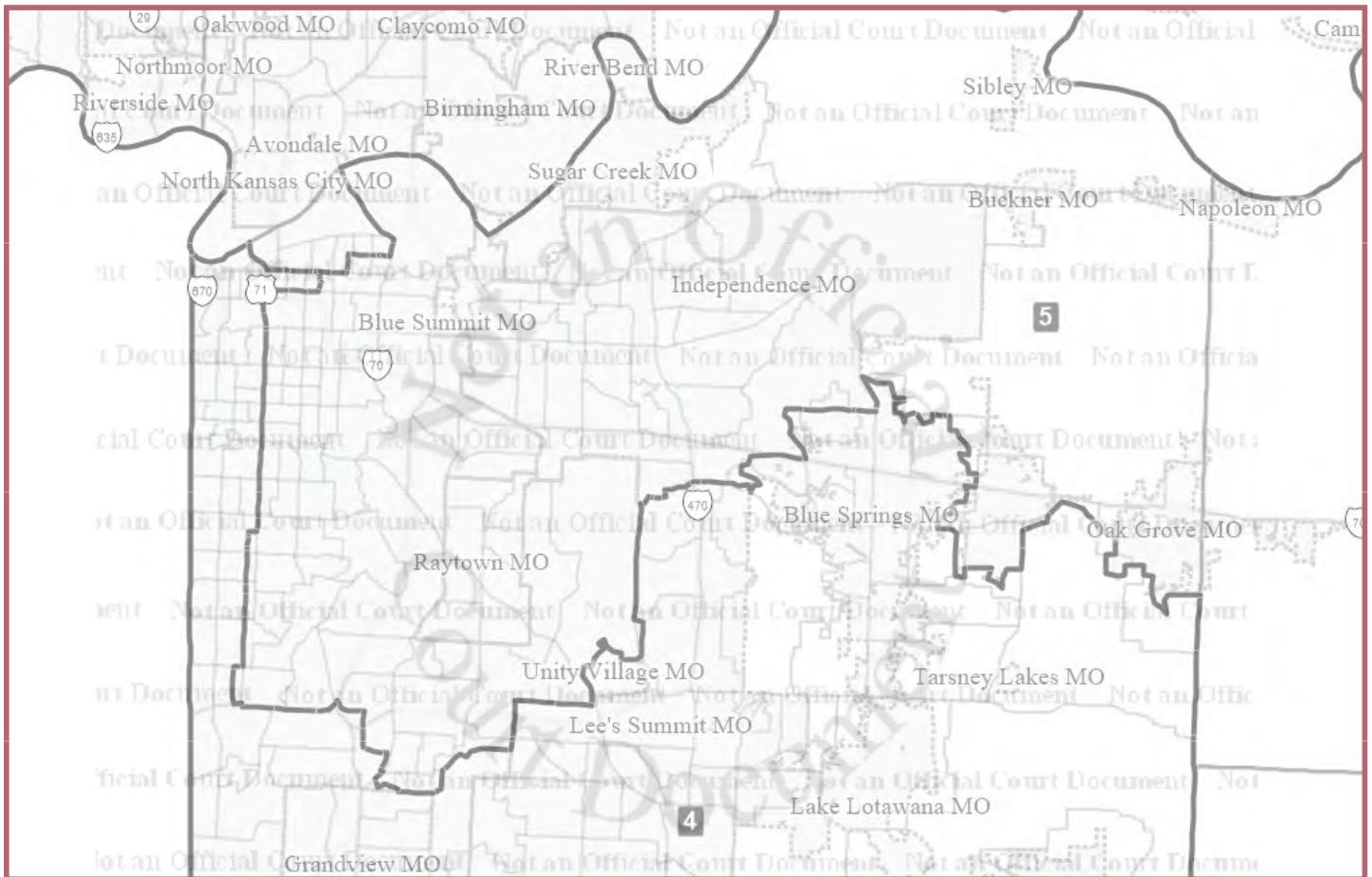


Missouri FIRST Map





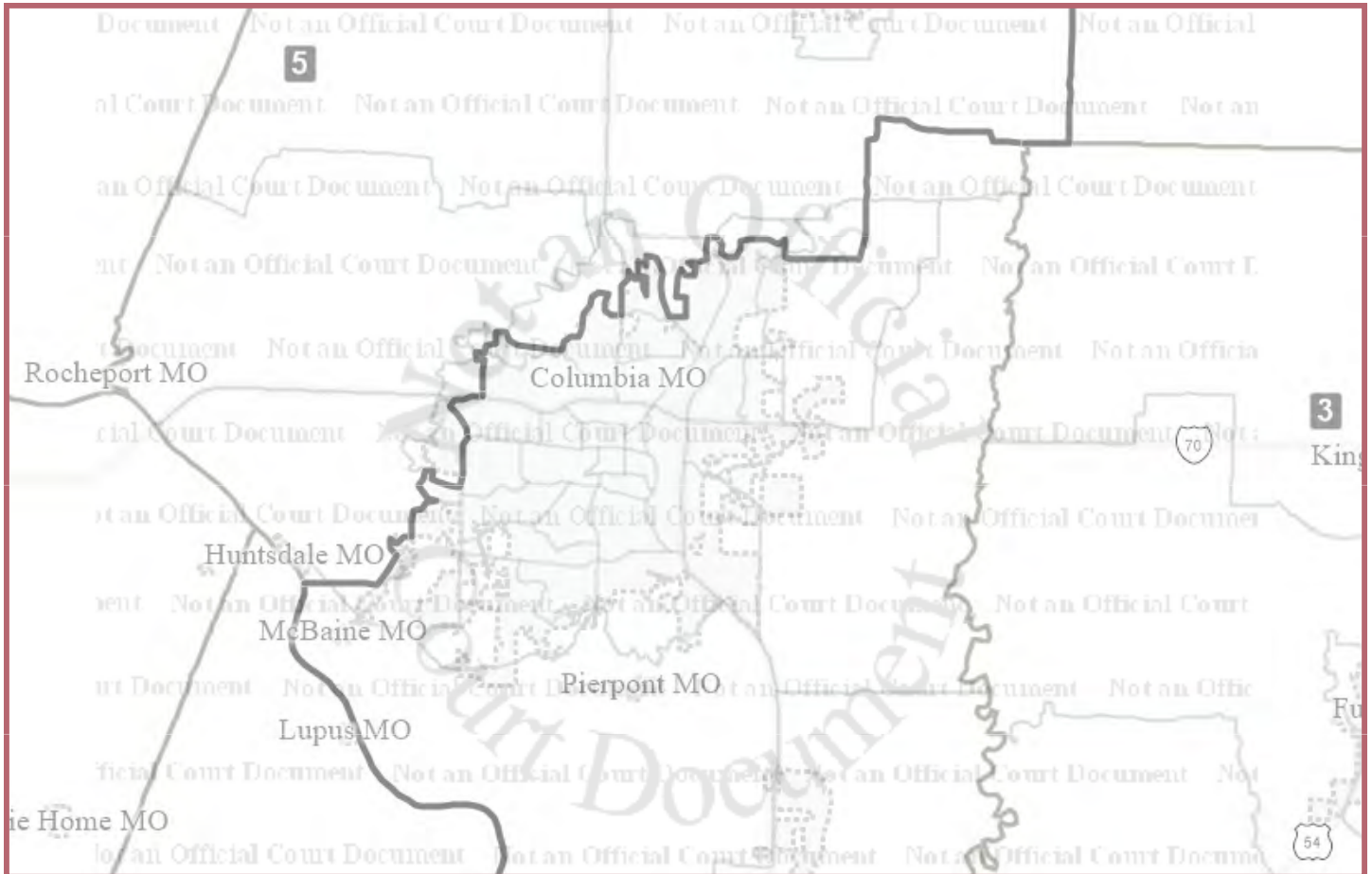
Missouri FIRST Map



Kansas City Metropolitan



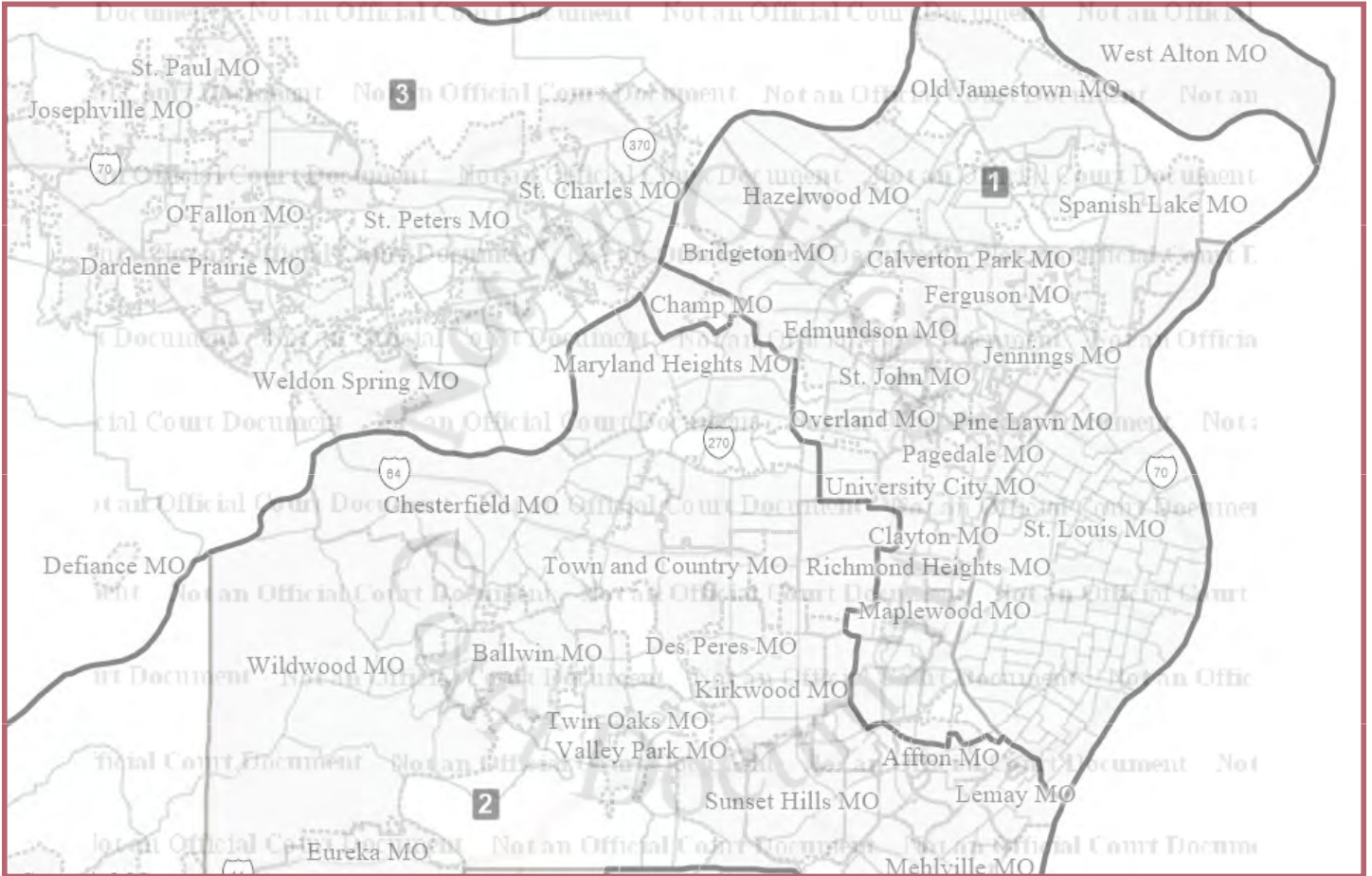
Missouri FIRST Map



Boone County



Missouri FIRST Map



St. Louis Metropolitan

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 new sections enacted in lieu thereof, to be known as sections 128.345, 128.346, 128.348, 128.461, 128.462, 128.463, 128.464, 128.465, 128.466, 128.467, 128.468, and 128.469, to read as follows:

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

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

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

2. The districts established by sections 128.451 to 128.458 for the election of representatives to the Congress of the United States shall be effective beginning with the 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.

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
 49 VTD: AP046
 50 VTD: AP047
 51 VTD: AP048
 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 Not an Official Court Document 4 Not an Official Court Document Not an O

65 VTD: AP216 Not an Official Court Document Not an Official Court Document
 66 VTD: AP217
 67 VTD: AP218 Not an Official Court Document Not an Official Court Document Not an Official Court Document
 68 VTD: AP225 Not an Official Court Document Not an Official Court Document Not an Official Court Document
 69 VTD: AP230
 70 VTD: AP232 Not an Official Court Document Not an Official Court Document Not an Official Court Document
 71 VTD: AP233
 72 VTD: AP237 Not an Official Court Document Not an Official Court Document Not an Official Court Document
 73 VTD: CC002
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 75 VTD: CC004
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 81 Block: 291892151022012
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 83 Block: 291892151022014
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 87 VTD: CC007
 88 VTD: CC008 Not an Official Court Document Not an Official Court Document Not an Official Court Document
 89 VTD: CC009
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 91 VTD: CC012
 92 VTD: CC013 Not an Official Court Document Not an Official Court Document Not an Official Court Document
 93 VTD: CC017
 94 VTD: CC018 Not an Official Court Document Not an Official Court Document Not an Official Court Document
 95 VTD: CC022
 96 VTD: CC023 Not an Official Court Document Not an Official Court Document Not an Official Court Document
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 99 Block: 291892153011003
 100 Block: 291892153011004
 101 Block: 291892153011005

HCS HB 2909 Not an Official Court Document 5 Not an Official Court Document Not an O

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 103 **Block: 291892153011008**
 104 **Block: 291892153011009**
 105 **VTD: CC024**
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 131 **Block: 291892153024004**
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 133 **Block: 291892153024006**
 134 **Block: 291892153024007**
 135 **Block: 291892153024008**
 136 **Block: 291892153024009**
 137 **Block: 291892153024010**
 138 **VTD: CC030**

HCS HB 2909 Not an Official Court Document 6 Not an Official Court Document Not an O

139 VTD: CC031 Not an Official Court Document Not an Official Court Document
 140 VTD: CC033
 141 VTD: CC035 Not an Official Court Document Not an Official Court Document
 142 VTD: CC037 Not an Official Court Document Not an Official Court Document Not an Official
 143 VTD: CC038
 144 VTD: CC041 Not an Official Court Document Not an Official Court Document Not an
 145 VTD: CC042
 146 VTD: CC043 Not an Official Court Document Not an Official Court Document
 147 VTD: CC044
 148 VTD: CC045 Not an Official Court Document Not an Official Court Document Not an Official Court D
 149 VTD: CC046
 150 VTD: CC047 Not an Official Court Document Not an Official Court Document Not an Official
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 153 VTD: CC051
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 155 VTD: CC054
 156 VTD: CC056 Not an Official Court Document Not an Official Court Document Not an Official Court
 157 VTD: CC057
 158 VTD: CC058 Not an Official Court Document Not an Official Court Document Not an Offic
 159 VTD: CC201
 160 VTD: CC202 Not an Official Court Document Not an Official Court Document Not
 161 VTD: CC203
 162 VTD: CC205 Not an Official Court Document Not an Official Court Document
 163 VTD: CC208
 164 VTD: CC221 Not an Official Court Document Not an Official Court Document Not an Official Cou
 165 VTD: CLA001
 166 VTD: CLA002 Not an Official Court Document Not an Official Court Document Not an Offi
 167 VTD: CLA003
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 169 VTD: CLA005
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HCS HB 2909 Not an Official Court Document 7 Not an Official Court Document Not an O

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204 **VTD: CLA027**
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HCS HB 2909 Not an Official Court Document Not an Official Court Document Not an Official Court Document

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HCS HB 2909 10

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HCS HB 2909 11

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HCS HB 2909 13

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HCS HB 2909 14

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469 **VTD: LC016**
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471 **VTD: LC018**

HCS HB 2909 15

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HCS HB 2909 16

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HCS HB 2909 Not an Official Court Document 17 Not an Official Court Document Not an Official Court Document

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- 550 VTD: MID020
- 551 VTD: MID021
- 552 VTD: MID022
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- 554 VTD: MID024
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- 556 VTD: MID026
- 557 VTD: MID027
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- 563 VTD: MID033
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- 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

Exhibit A, Page 0046

HCS HB 2909 Not an Official Court Document 20 Not an Official Court Document Not an Official Court Document

657 VTD: NOR208 Not an Official Court Document Not an Official Court Document
658 VTD: NOR213
659 VTD: NOR218 Not an Official Court Document Not an Official Court Document Not an Official Court Document
660 VTD: NOR222 Not an Official Court Document Not an Official Court Document Not an Official Court Document
661 VTD: NRW001
662 VTD: NRW002 Not an Official Court Document Not an Official Court Document Not an Official Court Document
663 VTD: NRW003
664 VTD: NRW004 Not an Official Court Document Not an Official Court Document
665 VTD: NRW005
666 VTD: NRW006 Not an Official Court Document Not an Official Court Document Not an Official Court Document
667 VTD: NRW007
668 VTD: NRW008 Not an Official Court Document Not an Official Court Document Not an Official Court Document
669 VTD: NRW009
670 VTD: NRW010 Not an Official Court Document Not an Official Court Document Not an Official Court Document
671 VTD: NRW011
672 VTD: NRW012 Not an Official Court Document Not an Official Court Document Not an Official Court Document
673 VTD: NRW013
674 VTD: NRW014 Not an Official Court Document Not an Official Court Document Not an Official Court Document
675 VTD: NRW015
676 VTD: NRW016 Not an Official Court Document Not an Official Court Document Not an Official Court Document
677 VTD: NRW017
678 VTD: NRW018 Not an Official Court Document Not an Official Court Document Not an Official Court Document
679 VTD: NRW019
680 VTD: NRW020 Not an Official Court Document Not an Official Court Document Not an Official Court Document
681 VTD: NRW021
682 VTD: NRW022 Not an Official Court Document Not an Official Court Document Not an Official Court Document
683 VTD: NRW023
684 VTD: NRW024 Not an Official Court Document Not an Official Court Document Not an Official Court Document
685 VTD: NRW025
686 VTD: NRW026 Not an Official Court Document Not an Official Court Document Not an Official Court Document
687 VTD: NRW027 Not an Official Court Document Not an Official Court Document Not an Official Court Document
688 VTD: NRW028
689 VTD: NRW029
690 VTD: NRW030
691 VTD: NRW031
692 VTD: NRW032
693 VTD: NRW033

HCS HB 2909 Not an Official Court Document 21 Not an Official Court Document Not an Official Court Document

694 VTD: NRW034 Not an Official Court Document Not an Official Court Document
695 VTD: NRW035 Not an Official Court Document Not an Official Court Document
696 VTD: NRW036 Not an Official Court Document Not an Official Court Document
697 VTD: NRW037 Not an Official Court Document Not an Official Court Document
698 VTD: NRW038 Not an Official Court Document Not an Official Court Document
699 VTD: NRW039 Not an Official Court Document Not an Official Court Document
700 VTD: NRW040 Not an Official Court Document Not an Official Court Document
701 VTD: NRW041 Not an Official Court Document Not an Official Court Document
702 VTD: NRW042 Not an Official Court Document Not an Official Court Document
703 VTD: NRW043 Not an Official Court Document Not an Official Court Document
704 VTD: NRW044 Not an Official Court Document Not an Official Court Document
705 VTD: NRW045 Not an Official Court Document Not an Official Court Document
706 VTD: NRW046 Not an Official Court Document Not an Official Court Document
707 VTD: NRW047 Not an Official Court Document Not an Official Court Document
708 VTD: NRW048 Not an Official Court Document Not an Official Court Document
709 VTD: NRW049 Not an Official Court Document Not an Official Court Document
710 VTD: NRW050 Not an Official Court Document Not an Official Court Document
711 VTD: NRW051 Not an Official Court Document Not an Official Court Document
712 VTD: NRW200 Not an Official Court Document Not an Official Court Document
713 VTD: NRW201 Not an Official Court Document Not an Official Court Document
714 VTD: NRW202 Not an Official Court Document Not an Official Court Document
715 VTD: NRW203 Not an Official Court Document Not an Official Court Document
716 VTD: NRW204 Not an Official Court Document Not an Official Court Document
717 VTD: NRW205 Not an Official Court Document Not an Official Court Document
718 VTD: NW001 Not an Official Court Document Not an Official Court Document
719 VTD: NW002 Not an Official Court Document Not an Official Court Document
720 VTD: NW003 Not an Official Court Document Not an Official Court Document
721 VTD: NW004 Not an Official Court Document Not an Official Court Document
722 VTD: NW005 Not an Official Court Document Not an Official Court Document
723 VTD: NW006 Not an Official Court Document Not an Official Court Document
724 VTD: NW007 Not an Official Court Document Not an Official Court Document
725 VTD: NW008 Not an Official Court Document Not an Official Court Document
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727 VTD: NW010 Not an Official Court Document Not an Official Court Document
728 VTD: NW011 Not an Official Court Document Not an Official Court Document
729 VTD: NW012 Not an Official Court Document Not an Official Court Document
730 VTD: NW013 Not an Official Court Document Not an Official Court Document

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 Not an Official Court Document Not an Official Court Document Not an Official Court Document

879 **VTD: SPL027** Not an Official Court Document Not an Official Court Document
 880 **VTD: SPL028**
 881 **VTD: SPL201** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 882 **VTD: SPL202**
 883 **VTD: SPL207** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 884 **VTD: SPL208**
 885 **VTD: UNV001** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 886 **VTD: UNV002** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 887 **VTD: UNV003**
 888 **VTD: UNV004** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 889 **VTD: UNV005**
 890 **VTD: UNV006** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 891 **VTD: UNV007**
 892 **VTD: UNV008** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 893 **VTD: UNV009**
 894 **VTD: UNV010** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 895 **VTD: UNV011**
 896 **VTD: UNV012** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 897 **VTD: UNV013**
 898 **VTD: UNV014** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 899 **VTD: UNV015**
 900 **VTD: UNV016** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 901 **VTD: UNV017**
 902 **VTD: UNV018** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 903 **VTD: UNV019**
 904 **VTD: UNV020** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 905 **VTD: UNV021**
 906 **VTD: UNV022** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 907 **VTD: UNV023**
 908 **VTD: UNV024** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 909 **VTD: UNV025**
 910 **VTD: UNV026** Not an Official Court Document Not an Official Court Document Not an Official Court Document
 911 **VTD: UNV027**
 912 **VTD: UNV028**
 913 **VTD: UNV029**
 914 **VTD: UNV030**
 915 **VTD: UNV031**

HCS HB 2909 27 Not an Official Court Document Not an Official Court Document

- 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 Not an Official Court Document 29 Not an Official Court Document Not an O

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 Not an Official Court Document 30 Not an Official Court Document Not an O

94 **Block: 291833121922045** Not an Official Court Document Not an Official Court Document
95 **Block: 291833121922046**
96 **Block: 291833121922048** Not an Official Court Document Not an Official Court Do
97 **Block: 291833121922049** Not an Official Court Document Not an Official Court Document
98 **Block: 291833121933000**
99 **Block: 291833121933001** Not an Official Court Document Not an Official Court Document
100 **Block: 291833121933002**
101 **Block: 291833121933003** Not an Official Court Document Not an Official Court Document
102 **Block: 291833121933007**
103 **Block: 291833121933008** Not an Official Court Document Not an Official Court D
104 **Block: 291833121933009**
105 **Block: 291833121933010** Not an Official Court Document Not an Official
106 **Block: 291833121933011**
107 **Block: 291833121933012** Not an Official Court Document Not an Official Court Document
108 **Block: 291833121933013**
109 **Block: 291833121933014** Not an Official Court Document Not an Official Court Document
110 **Block: 291833121933015**
111 **Block: 291833121933016** Not an Official Court Document Not an Official Court
112 **Block: 291833121933017**
113 **Block: 291833121933018** Not an Official Court Document Not an Official
114 **Block: 291833121933019**
115 **Block: 291833121933020** Not an Official Court Document Not an Official Court Document
116 **Block: 291833121933021**
117 **Block: 291833121933022** Not an Official Court Document Not an Official Court Document
118 **Block: 291833121933023**
119 **Block: 291833121933024** Not an Official Court Document Not an Official Court
120 **Block: 291833121933025**
121 **Block: 291833121933026** Not an Official Court Document Not an Official
122 **Block: 291833121933027**
123 **Block: 291833121933028** Not an Official Court Document Not an Official Court Document
124 **Block: 291833121933029**
125 **Block: 291833121933030** Not an Official Court Document Not an Official Court Document
126 **Block: 291833121933037**
127 **Block: 291833121933038**
128 **Block: 291833121933048**
129 **Block: 291833121933049**
130 **VTD: Delmar**

HCS HB 2909 Not an Official Court Document 31 Not an Official Court Document Not an Official Court Document

131 **VTD: Discovery** Not an Official Court Document Not an Official Court Document
132 **Block: 291833117352016**
133 **VTD: DuVall** Not an Official Court Document Not an Official Court Document Not an Official Court Document
134 **VTD: Feise** Not an Official Court Document Not an Official Court Document Not an Official Court Document
135 **VTD: Fieldcrest**
136 **VTD: Foristell**
137 **Block: 291833120032054**
138 **Block: 291833120032055** Not an Official Court Document Not an Official Court Document
139 **Block: 291833120032056**
140 **Block: 291833120032058** Not an Official Court Document Not an Official Court Document
141 **Block: 291833120032059**
142 **Block: 291833120032060** Not an Official Court Document Not an Official Court Document
143 **Block: 291833120032061**
144 **Block: 291833120032062** Not an Official Court Document Not an Official Court Document
145 **Block: 291833120032063**
146 **Block: 291833120032064** Not an Official Court Document Not an Official Court Document
147 **Block: 291833120032065**
148 **Block: 291833120032077** Not an Official Court Document Not an Official Court Document
149 **Block: 291833120032079**
150 **Block: 291833120032080** Not an Official Court Document Not an Official Court Document
151 **Block: 291833120032081**
152 **Block: 291833120032084** Not an Official Court Document Not an Official Court Document
153 **Block: 291833120032085**
154 **Block: 291833120032086** Not an Official Court Document Not an Official Court Document
155 **Block: 291833120032087**
156 **Block: 291833120032088** Not an Official Court Document Not an Official Court Document
157 **Block: 291833120032089**
158 **Block: 291833120032090** Not an Official Court Document Not an Official Court Document
159 **VTD: Freymuth**
160 **VTD: Glengate** Not an Official Court Document Not an Official Court Document
161 **Block: 291833117381000**
162 **Block: 291833117381001** Not an Official Court Document Not an Official Court Document
163 **Block: 291833117381002**
164 **Block: 291833117381003**
165 **Block: 291833117381004**
166 **Block: 291833117381005**
167 **Block: 291833117381006**

HCS HB 2909 32 Not an Official Court Document Not an Official Court Document Not an Official Court Document

168 **Block: 291833117381007** Not an Official Court Document Not an Official Court Document
169 **Block: 291833117381008**
170 **Block: 291833117381009** Not an Official Court Document Not an Official Court Document
171 **Block: 291833117381010** Not an Official Court Document Not an Official Court Document
172 **Block: 291833117381011** Not an Official Court Document Not an Official Court Document
173 **Block: 291833117381012** Not an Official Court Document Not an Official Court Document
174 **Block: 291833117381023** Not an Official Court Document Not an Official Court Document
175 **Block: 291833117381024** Not an Official Court Document Not an Official Court Document
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198 **Block: 291833117382021**
199 **Block: 291833117382022** Not an Official Court Document Not an Official Court Document
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 Not an Official Court Document 34 Not an Official Court Document Not an O

242 VTD: BON013 Not an Official Court Document Not an Official Court Document
243 VTD: BON014 Not an Official Court Document Not an Official Court Document
244 VTD: BON015 Not an Official Court Document Not an Official Court Document
245 VTD: BON016 Not an Official Court Document Not an Official Court Document
246 VTD: BON017 Not an Official Court Document Not an Official Court Document
247 VTD: BON018 Not an Official Court Document Not an Official Court Document
248 VTD: BON019 Not an Official Court Document Not an Official Court Document
249 VTD: BON020 Not an Official Court Document Not an Official Court Document
250 VTD: BON021 Not an Official Court Document Not an Official Court Document
251 VTD: BON022 Not an Official Court Document Not an Official Court Document
252 VTD: BON023 Not an Official Court Document Not an Official Court Document
253 VTD: BON024 Not an Official Court Document Not an Official Court Document
254 VTD: BON025 Not an Official Court Document Not an Official Court Document
255 VTD: BON026 Not an Official Court Document Not an Official Court Document
256 VTD: BON027 Not an Official Court Document Not an Official Court Document
257 VTD: BON028 Not an Official Court Document Not an Official Court Document
258 VTD: BON029 Not an Official Court Document Not an Official Court Document
259 VTD: BON030 Not an Official Court Document Not an Official Court Document
260 VTD: BON031 Not an Official Court Document Not an Official Court Document
261 VTD: BON032 Not an Official Court Document Not an Official Court Document
262 VTD: BON033 Not an Official Court Document Not an Official Court Document
263 VTD: BON034 Not an Official Court Document Not an Official Court Document
264 VTD: BON035 Not an Official Court Document Not an Official Court Document
265 VTD: BON036 Not an Official Court Document Not an Official Court Document
266 VTD: BON037 Not an Official Court Document Not an Official Court Document
267 VTD: BON038 Not an Official Court Document Not an Official Court Document
268 VTD: BON039 Not an Official Court Document Not an Official Court Document
269 VTD: BON040 Not an Official Court Document Not an Official Court Document
270 VTD: BON200 Not an Official Court Document Not an Official Court Document
271 VTD: BON202 Not an Official Court Document Not an Official Court Document
272 VTD: BON203 Not an Official Court Document Not an Official Court Document
273 VTD: BON205 Not an Official Court Document Not an Official Court Document
274 VTD: BON206 Not an Official Court Document Not an Official Court Document
275 VTD: BON207 Not an Official Court Document Not an Official Court Document
276 VTD: BON208 Not an Official Court Document Not an Official Court Document
277 VTD: BON210 Not an Official Court Document Not an Official Court Document
278 VTD: BON211 Not an Official Court Document Not an Official Court Document

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 Not an Official Court Document 36 Not an Official Court Document Not an O

316 VTD: CC052 Not an Official Court Document Not an Official Court Document
 317 VTD: CC055
 318 VTD: CC059 Not an Official Court Document Not an Official Court Document Not an Official Court Do
 319 VTD: CC060
 320 VTD: CC214 Not an Official Court Document Not an Official Court Document Not an Official
 321 VTD: CHE001 Not an Official Court Document Not an Official Court Document Not an Official
 322 VTD: CHE002 Not an Official Court Document Not an Official Court Document Not an
 323 VTD: CHE003 Not an Official Court Document Not an Official Court Document
 324 VTD: CHE004
 325 VTD: CHE005 Not an Official Court Document Not an Official Court Document Not an Official Court D
 326 VTD: CHE006
 327 VTD: CHE007 Not an Official Court Document Not an Official Court Document Not an Official
 328 VTD: CHE008
 329 VTD: CHE009 Not an Official Court Document Not an Official Court Document Not
 330 VTD: CHE010
 331 VTD: CHE011 Not an Official Court Document Not an Official Court Document
 332 VTD: CHE012
 333 VTD: CHE013 Not an Official Court Document Not an Official Court Document Not an Official Court
 334 VTD: CHE014
 335 VTD: CHE015 Not an Official Court Document Not an Official Court Document Not an Offic
 336 VTD: CHE016
 337 VTD: CHE017 Not an Official Court Document Not an Official Court Document Not
 338 VTD: CHE018
 339 VTD: CHE019 Not an Official Court Document Not an Official Court Document
 340 VTD: CHE020
 341 VTD: CHE021 Not an Official Court Document Not an Official Court Document Not an Official Cou
 342 VTD: CHE022
 343 VTD: CHE023 Not an Official Court Document Not an Official Court Document Not an Offi
 344 VTD: CHE024
 345 VTD: CHE025 Not an Official Court Document Not an Official Court Document N
 346 VTD: CHE026
 347 VTD: CHE027 Not an Official Court Document Not an Official Court Document Not an Official Court Docu
 348 VTD: CHE028
 349 VTD: CHE029
 350 VTD: CHE030
 351 VTD: CHE031
 352 VTD: CHE032

HCS HB 2909 37 Not an Official Court Document Not an Official Court Document

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**
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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**
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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 Not an Official Court Document 39 Not an Official Court Document Not an O

427 VTD: CON007 Not an Official Court Document Not an Official Court Document
 428 VTD: CON008
 429 VTD: CON009 Not an Official Court Document Not an Official Court Document Not an Official Court Do
 430 VTD: CON010 Not an Official Court Document Not an Official Court Document Not an Official
 431 VTD: CON011
 432 VTD: CON012 Not an Official Court Document Not an Official Court Document Not an
 433 VTD: CON013
 434 VTD: CON014 Not an Official Court Document Not an Official Court Document
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 436 VTD: CON016 Not an Official Court Document Not an Official Court Document Not an Official Court D
 437 VTD: CON017
 438 VTD: CON018 Not an Official Court Document Not an Official Court Document Not an Official
 439 VTD: CON019
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 441 VTD: CON021
 442 VTD: CON022 Not an Official Court Document Not an Official Court Document
 443 VTD: CON023
 444 VTD: CON024 Not an Official Court Document Not an Official Court Document Not an Official Court
 445 VTD: CON025
 446 VTD: CON026 Not an Official Court Document Not an Official Court Document Not an Offic
 447 VTD: CON027
 448 VTD: CON028 Not an Official Court Document Not an Official Court Document Not
 449 VTD: CON029
 450 VTD: CON030 Not an Official Court Document Not an Official Court Document
 451 VTD: CON031
 452 VTD: CON032 Not an Official Court Document Not an Official Court Document Not an Official Cou
 453 VTD: CON033
 454 VTD: CON034 Not an Official Court Document Not an Official Court Document Not an Offi
 455 VTD: CON035
 456 VTD: CON036 Not an Official Court Document Not an Official Court Document N
 457 VTD: CON037
 458 VTD: CON038 Not an Official Court Document Not an Official Court Document Not an Official Court Docu
 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

Exhibit A, Page 0068

HCS HB 2909 42

538 **VTD: HAD013**
 539 **VTD: HAD019**
 540 **VTD: HAD020**
 541 **VTD: HAD021**
 542 **Block: 291892167004000**
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 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**
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 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**
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581 **Block: 291892194004014**
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583 **Block: 291892194005001**
584 **Block: 291892194005002**
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587 **Block: 291892194005007**
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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**
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 629 **Block: 291892195021007**
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 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
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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**
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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**
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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 Not an Official Court Document Not an Official Court Document Not an Official Court Document

- 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**
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 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**
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 933 **VTD: MR052**
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 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
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- 1012 VTD: QUE015
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- 1014 VTD: QUE017
- 1015 VTD: QUE018
- 1016 VTD: QUE019
- 1017 VTD: QUE020
- 1018 VTD: QUE021

HCS HB 2909 Not an Official Court Document 55 Not an Official Court Document Not an Official Court Document

1019 VTD: QUE022 Not an Official Court Document Not an Official Court Document
 1020 VTD: QUE023 Not an Official Court Document Not an Official Court Document
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 1031 VTD: QUE034 Not an Official Court Document Not an Official Court Document
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 1033 VTD: QUE036 Not an Official Court Document Not an Official Court Document
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 1037 VTD: QUE040 Not an Official Court Document Not an Official Court Document
 1038 VTD: QUE041 Not an Official Court Document Not an Official Court Document
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 1040 VTD: QUE043 Not an Official Court Document Not an Official Court Document
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 1042 VTD: QUE045 Not an Official Court Document Not an Official Court Document
 1043 VTD: QUE046 Not an Official Court Document Not an Official Court Document
 1044 VTD: QUE047 Not an Official Court Document Not an Official Court Document
 1045 VTD: QUE048 Not an Official Court Document Not an Official Court Document
 1046 VTD: QUE049 Not an Official Court Document Not an Official Court Document
 1047 VTD: QUE200 Not an Official Court Document Not an Official Court Document
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 1050 VTD: QUE203 Not an Official Court Document Not an Official Court Document
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 1052 VTD: QUE205 Not an Official Court Document Not an Official Court Document
 1053 VTD: QUE207 Not an Official Court Document Not an Official Court Document
 1054 VTD: QUE208 Not an Official Court Document Not an Official Court Document
 1055 VTD: QUE209 Not an Official Court Document Not an Official Court Document

HCS HB 2909 56 Not an Official Court Document Not an Official Court Document Not an Official Court Document

1056 VTD: QUE210 Not an Official Court Document Not an Official Court Document
 1057 VTD: QUE211 Not an Official Court Document Not an Official Court Document
 1058 VTD: QUE213 Not an Official Court Document Not an Official Court Document
 1059 VTD: TSF001 Not an Official Court Document Not an Official Court Document
 1060 VTD: TSF002 Not an Official Court Document Not an Official Court Document
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 1064 VTD: TSF006 Not an Official Court Document Not an Official Court Document
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 1086 VTD: TSF201 Not an Official Court Document Not an Official Court Document
 1087 VTD: WH001 Not an Official Court Document Not an Official Court Document
 1088 VTD: WH002 Not an Official Court Document Not an Official Court Document
 1089 VTD: WH003 Not an Official Court Document Not an Official Court Document
 1090 VTD: WH004 Not an Official Court Document Not an Official Court Document
 1091 VTD: WH005 Not an Official Court Document Not an Official Court Document
 1092 VTD: WH006 Not an Official Court Document Not an Official Court Document

Exhibit A, Page 0084

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**
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 1162 **Block: 292198201092013**
 1163 **Block: 292198201092014**
 1164 **Block: 292198201092015**
 1165 **Block: 292198201092017**
 1166 **Block: 292198201092019**

HCS HB 2909 Not an Official Court Document 59 Not an Official Court Document Not an O

1167 Block: 292198201092022 Not an Official Court Document Not an Official Court Document
1168 Block: 292198201092023 Not an Official Court Document Not an Official Court Document
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1192 Block: 292198201092051 Not an Official Court Document Not an Official Court Document
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1199 Block: 292198201092058 Not an Official Court Document Not an Official Court Document
1200 Block: 292198201092059 Not an Official Court Document Not an Official Court Document
1201 Block: 292198201092060 Not an Official Court Document Not an Official Court Document
1202 Block: 292198201092061 Not an Official Court Document Not an Official Court Document
1203 Block: 292198201092062 Not an Official Court Document Not an Official Court Document

HCS HB 2909 Not an Official Court Document 60 Not an Official Court Document Not an O

1204 **Block: 292198201092063** Not an Official Court Document Not an Official Court Document
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1241 **Block: 292198201042011** Not an Official Court Document Not an Official Court Document
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1276 **Block: 292198201042046** Not an Official Court Document Not an Official Court Document
1277 **Block: 292198201042047** Not an Official Court Document Not an Official Court Document

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1278 Block: 292198201042048
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1296 Block: 292198201042066
1297 Block: 292198201042067
1298 Block: 292198201042068
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1300 Block: 292198201042070
1301 Block: 292198201042071
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1309 Block: 292198201042079
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1313 Block: 292198201061002
1314 Block: 292198201061003

HCS HB 2909 63

1315 **Block: 292198201061004**
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1317 **Block: 292198201061006**
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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**
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1351 **Block: 292198201061021**

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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**
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- 1415 **Block: 292198201091041**
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- 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**

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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**
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HCS HB 2909 68

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HCS HB 2909 Not an Official Court Document 69 Not an Official Court Document Not an Official Court Document

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HCS HB 2909 Not an Official Court Document 70 Not an Official Court Document Not an O

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HCS HB 2909 Not an Official Court Document 71 Not an Official Court Document Not an O

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 223 **Block: 290190010031014**

HCS HB 2909 72

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247 **VTD: 4G**
248 **VTD: 4H**
249 **VTD: 4I**
250 **VTD: 4J**
251 **VTD: 4K**
252 **VTD: 4L**
253 **VTD: 4M**
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255 **VTD: 5B**
256 **VTD: 5C**
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260 **VTD: 5G**

HCS HB 2909 Not an Official Court Document 73 Not an Official Court Document Not an Official Court Document

261 **VTD: 5H** Not an Official Court Document Not an Official Court Document
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 271 **VTD: 6C**
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 273 **VTD: 6E**
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 275 **VTD: 6G**
 276 **VTD: 6H** Not an Official Court Document Not an Official Court Document Not an Official Court Document
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 283 **County: Camden MO**
 284 **VTD: Horseshoe Bend** Not an Official Court Document Not an Official Court Document
 285 **VTD: Osage Beach 1**
 286 **VTD: Osage Beach 2** Not an Official Court Document Not an Official Court Document
 287 **VTD: Osage Beach 3**
 288 **Block: 290299502011034** Not an Official Court Document Not an Official Court Document
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HCS HB 2909 74

298 **Block: 290299502012003**
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306 **Block: 290299502012019**
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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**
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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**
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 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**
- 382 **Block: 290997002072002**
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- 384 **Block: 290997002072004**
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- 408 **Block: 290997002113007**

HCS HB 2909 Not an Official Court Document 77 Not an Official Court Document Not an Official Court Document

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427 **VTD: Northwest** Not an Official Court Document Not an Official Court Document
428 **VTD: Parkdale** Not an Official Court Document Not an Official Court Document
429 **VTD: Peaceful Village** Not an Official Court Document Not an Official Court Document
430 **VTD: Raintree** Not an Official Court Document Not an Official Court Document
431 **VTD: Rockwood** Not an Official Court Document Not an Official Court Document
432 **VTD: Scotsdale** Not an Official Court Document Not an Official Court Document
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HCS HB 2909 Not an Official Court Document 78 Not an Official Court Document Not an O

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HCS HB 2909 Not an Official Court Document 79 Not an Official Court Document Not an Official Court Document

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HCS HB 2909 80

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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**
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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 Not an Official Court Document 81 Not an Official Court Document Not an O

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HCS HB 2909 82

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HCS HB 2909 Not an Official Court Document 83 Not an Official Court Document Not an O

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HCS HB 2909 Not an Official Court Document 84 Not an Official Court Document Not an O

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HCS HB 2909 85

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HCS HB 2909 86

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778 **VTD: Flint Hill**

HCS HB 2909 87

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HCS HB 2909 Not an Official Court Document 88 Not an Official Court Document Not an O

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HCS HB 2909 89

853 **VTD: Government**
 854 **VTD: Graybridge**
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HCS HB 2909 Not an Official Court Document 90 Not an Official Court Document Not an Official Court Document

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910 **VTD: Kampville**
911 **VTD: Katy Trail** Not an Official Court Document Not an Official Court Document
912 **VTD: Lakes**
913 **VTD: Laura Hill** Not an Official Court Document Not an Official Court Document
914 **VTD: Lincoln**
915 **VTD: Mamelle** Not an Official Court Document Not an Official Court Document
916 **VTD: Marina**
917 **VTD: McClay** Not an Official Court Document Not an Official Court Document
918 **VTD: McNair**
919 **VTD: Meadow Valley** Not an Official Court Document Not an Official Court Document
920 **VTD: Mid Rivers**
921 **VTD: Montbrook** Not an Official Court Document Not an Official Court Document
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**
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HCS HB 2909 92

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 987 **VTD: Rivers**
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 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**
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HCS HB 2909 Not an Official Court Document 94 Not an Official Court Document Not an O

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HCS HB 2909 Not an Official Court Document 95 Not an Official Court Document Not an O

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- 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**

1223 **Block: 292198201092043**

1224 **County: Washington MO**

128.464. The fourth congressional district shall be composed of the following:

County: Barton MO

County: Bates MO

County: Benton MO

County: Boone MO

VTD: 07

VTD: 08

VTD: 09

VTD: 10

VTD: 11

VTD: 12

VTD: 15

VTD: 16

VTD: 17

VTD: 18

Block: 290190018032015

Block: 290190018032016

Block: 290190018032018

Block: 290190018032033

Block: 290190018032034

Block: 290190018032035

Block: 290190018032036

Block: 290190018032040

Block: 290190018032041

Block: 290190018032042

Block: 290190018032043

Block: 290190018032044

VTD: 19

VTD: 1A

VTD: 1C

VTD: 1D

VTD: 1F

VTD: 1G

VTD: 1J

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 Not an Official Court Document 103 Not an Official Court Document Not an O

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 Not an Official Court Document 104 Not an Official Court Document Not an O

184 Block: 290299502013033 Not an Official Court Document Not an Official Court Document
185 Block: 290299502013034 Not an Official Court Document Not an Official Court Document
186 Block: 290299502013035 Not an Official Court Document Not an Official Court Document
187 Block: 290299502013036 Not an Official Court Document Not an Official Court Document
188 Block: 290299502013037 Not an Official Court Document Not an Official Court Document
189 Block: 290299502013038 Not an Official Court Document Not an Official Court Document
190 Block: 290299502013039 Not an Official Court Document Not an Official Court Document
191 Block: 290299502013040 Not an Official Court Document Not an Official Court Document
192 Block: 290299502013041 Not an Official Court Document Not an Official Court Document
193 Block: 290299502013042 Not an Official Court Document Not an Official Court Document
194 Block: 290299502013044 Not an Official Court Document Not an Official Court Document
195 Block: 290299502023000 Not an Official Court Document Not an Official Court Document
196 Block: 290299502023001 Not an Official Court Document Not an Official Court Document
197 Block: 290299502023005 Not an Official Court Document Not an Official Court Document
198 Block: 290299502023006 Not an Official Court Document Not an Official Court Document
199 Block: 290299502023007 Not an Official Court Document Not an Official Court Document
200 Block: 290299502023008 Not an Official Court Document Not an Official Court Document
201 Block: 290299502023009 Not an Official Court Document Not an Official Court Document
202 Block: 290299502023010 Not an Official Court Document Not an Official Court Document
203 Block: 290299502023011 Not an Official Court Document Not an Official Court Document
204 Block: 290299502023013 Not an Official Court Document Not an Official Court Document
205 Block: 290299502023014 Not an Official Court Document Not an Official Court Document
206 Block: 290299502023015 Not an Official Court Document Not an Official Court Document
207 Block: 290299502023016 Not an Official Court Document Not an Official Court Document
208 Block: 290299502023017 Not an Official Court Document Not an Official Court Document
209 Block: 290299502023018 Not an Official Court Document Not an Official Court Document
210 Block: 290299502023019 Not an Official Court Document Not an Official Court Document
211 Block: 290299502023020 Not an Official Court Document Not an Official Court Document
212 Block: 290299502023034 Not an Official Court Document Not an Official Court Document
213 Block: 290299506002000 Not an Official Court Document Not an Official Court Document
214 Block: 290299506002001 Not an Official Court Document Not an Official Court Document
215 Block: 290299506002002 Not an Official Court Document Not an Official Court Document
216 Block: 290299506002003 Not an Official Court Document Not an Official Court Document
217 Block: 290299506002004 Not an Official Court Document Not an Official Court Document
218 Block: 290299506002005 Not an Official Court Document Not an Official Court Document
219 Block: 290299506002006 Not an Official Court Document Not an Official Court Document
220 Block: 290299506002007 Not an Official Court Document Not an Official Court Document

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 Not an Official Court Document 107 Not an Official Court Document Not an O

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 Not an Official Court Document 114 Not an Official Court Document Not an O

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:

County: Clay MO

VTD: Chou 8

Block: 290470206032000

Block: 290470206032001

Block: 290470206032002

Block: 290470206032003

Block: 290470206032004

Block: 290470206032007

Block: 290470206032008

Block: 290470206032014

Block: 290470206032015

Block: 290470206032016

Block: 290470206032017

Block: 290470206032018

Block: 290470206034000

Block: 290470206034001

Block: 290470206034002

Block: 290470206034003

Block: 290470206034004

Block: 290470206034005

Block: 290470206034006

Block: 290470206034007

Block: 290470206034008

Block: 290470206034018

Block: 290470206034019

Block: 290470206034020

Block: 290470208032005

Block: 290470208032006

Block: 290470208032007

Block: 290470208032008

Block: 290470208032009

Block: 290470208032010

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 PI 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 Not an Official Court Document 117 Not an Official Court Document Not an O

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 Not an Official Court Document 118 Not an Official Court Document Not an O

- 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 PI 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: PI 1**
96 **VTD: PI 2**
97 **VTD: PI 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**

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**

- 2 **128.468. The eighth congressional district shall be composed of the following:**
- 3 **County: Bollinger MO**
- 4 **County: Butler MO**
- 5 **County: Cape Girardeau MO**
- 6 **County: Carter MO**
- 7 **County: Dent MO**
- 8 **County: Douglas MO**
- 9 **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**

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

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

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.

✓

FIRST REGULAR SESSION

[TRULY AGREED TO AND FINALLY PASSED]

SENATE SUBSTITUTE FOR

SENATE BILL NO. 152

103RD GENERAL ASSEMBLY

2025

1095S.13T

AN ACT

To amend chapter 130, RSMo, by adding thereto six new sections relating to campaign finance.

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

Section A. Chapter 130, RSMo, is amended by adding thereto
2 six new sections, to be known as sections 130.170, 130.173,
3 130.176, 130.179, 130.185, and 130.188, to read as follows:

130.170. For purposes of sections 130.170 to 130.188,
2 the following terms mean:

3 (1) "Committee", the same meaning as otherwise
4 provided in section 130.011, except it shall not include
5 candidate committees;

6 (2) "Directly or indirectly", acting either alone or
7 jointly with, through, or on behalf of any other committee,
8 organization, person, or other entity;

9 (3) "Foreign national", any of the following:

10 (a) An individual who is not a citizen or lawful
11 permanent resident of the United States of America;

12 (b) A government, or subdivision, of a foreign country
13 or municipality thereof;

14 (c) A foreign political party;

15 (d) Any entity, such as a partnership, association,
16 corporation, organization, or other combination of persons,

Exhibit E

that is organized under the laws of, or has its principal place of business in, a foreign country; or

(e) Any entity organized pursuant to the laws of the United States of America or any state thereof that is wholly or majority owned by a person or entity described in paragraphs (a) to (d) of this subdivision, unless:

a. Any contribution or expenditure it makes derives entirely from funds generated by the entity's United States operations; and

b. All decisions concerning the contribution or expenditure are made by individuals who are United States citizens or lawful permanent residents, except for setting overall budget amounts;

(4) "Funds obtained through the usual course of business", funds generated entirely by the entity's United States operations;

(5) "Lobbyist", the same meaning as in section 105.470;

(6) "Prohibited sources", contributions from or expenditures by a foreign national made with the intent to use such funds to influence an election on a ballot measure;

(7) "Preliminary activity", includes, but is not limited to, conducting a poll, drafting ballot measure language, conducting a focus group, making telephone calls, and travel;

(8) "Tax-exempt organization", an organization that is described in section 501(c) of the Internal Revenue Code of 1986 and is exempt from taxation under section 501(a) of such Code. A political organization organized pursuant to section 527 of such Code shall not be considered a tax-exempt organization.

130.173. 1. Upon creating, forming, or registering a committee, the treasurer shall file an accompanying

certification that no preliminary activity was funded by prohibited sources, whether directly or indirectly.

2. After a committee has been created, formed, or registered, the committee shall not knowingly or willfully receive, solicit, or accept contributions from a prohibited source, whether directly or indirectly.

3. Any report filed pursuant to this chapter shall include an affirmation that the committee has not knowingly or willfully received, solicited, or accepted, directly or indirectly, contributions from a prohibited source.

4. Any committee or person that makes an expenditure in support of or in opposition to a ballot measure shall keep records of any contribution or expenditure and retain such records in the same manner and for the same period of time as is required by section 130.036.

130.176. 1. Upon a committee's receipt of a contribution of more than two thousand dollars, the treasurer shall obtain from the donor an affirmation that the donor is not a foreign national and has not knowingly or willfully accepted funds, directly or indirectly, aggregating in excess of ten thousand dollars from one or more prohibited sources within the two-year period immediately preceding the date the contribution is made, in the case of an individual, or within the four-year period immediately preceding the date the contribution is made, in case of any other entity. Receipt of an affirmation by a committee pursuant to this subsection shall create a rebuttable presumption of compliance with this subsection on the part of the committee. Nothing in this subsection shall prohibit the attorney general from pursuing any action pursuant to section 130.188 if the attorney general has found a willful violation of this subsection.

2. Each disclosure report filed pursuant to section 130.041 shall require the treasurer of a committee to affirm that the donor associated with each contribution is not a foreign national and has not knowingly or willfully received, solicited, or accepted, whether directly or indirectly, contributions from one or more prohibited sources aggregating in excess of ten thousand dollars within the four-year period immediately preceding the date of the contribution.

3. Within forty-eight hours of making one or more expenditures supporting or opposing a ballot measure, the entity making the expenditure shall affirm to the Missouri ethics commission that it has not knowingly or willfully accepted funds, directly or indirectly, aggregating in excess of ten thousand dollars from one or more prohibited sources within the four-year period immediately preceding the date the expenditure is made and that it will not do so through the remainder of the calendar year in which the ballot measure will appear on the ballot. Each disclosure report filed pursuant to section 130.041 shall require the entity making the expenditure to affirm that it has not knowingly or willfully accepted funds, directly or indirectly, aggregating in excess of ten thousand dollars from one or more prohibited sources within the four-year period immediately preceding the date the expenditure is made. Receipt of an affirmation from a donor that it is not a foreign national shall create a rebuttable presumption that the entity has not knowingly or willingly accepted funds, directly or indirectly, aggregating in excess of ten thousand dollars from one or more prohibited sources. Nothing in this subsection shall prohibit the attorney general from pursuing any action pursuant to section 130.188

50 if the attorney general has found a willful violation of
51 this subsection.

52 4. Notwithstanding any provision of this section to
53 the contrary, a donor or entity that makes a contribution to
54 a committee or an expenditure in support of or in opposition
55 to a ballot measure from its own funds obtained through the
56 usual course of business or in any commercial or other
57 transaction from any source and which are not contributions
58 does not violate this section.

59 5. A committee shall not accept an in-kind
60 contribution from any foreign national or from any
61 individual or entity that has knowingly or willfully
62 accepted funds, directly or indirectly, aggregating in
63 excess of ten thousand dollars from one or more foreign
64 nationals within the four year period immediately preceding
65 the date the in-kind contribution is made. A foreign
66 national shall not make an in-kind expenditure for the
67 purpose of supporting or opposing any ballot measure.

130.179. 1. A foreign national may not direct,
2 dictate, control, or directly or indirectly participate in
3 the decision-making process of any person with regard to
4 that person's activities to influence an election on a
5 ballot measure, such as decisions concerning the making of
6 contributions to influence an election on a ballot measure.

7 2. A foreign national may not solicit, directly or
8 indirectly, the making of a donation, contribution, or
9 expenditure by another person to influence an election on a
10 ballot measure.

11 3. Nothing in sections 130.170 to 130.188 shall be
12 deemed to create or eliminate any existing rights or duties
13 beyond those specifically enumerated in such sections.

130.185. 1. Lawful donors to a tax-exempt
organization possess a right of privacy in their donations.
Any investigation of an alleged violation of sections
130.170 to 130.188 shall occur in a manner that shields the
identity of lawful donors as much as possible. The attorney
general shall not collect or require the submission of
information on the identity of any donor to a tax-exempt
organization other than those directly related to an alleged
violation of sections 130.170 to 130.188. Any collection or
required submission of information by the attorney general
regarding the identity of any donor to a tax-exempt
organization beyond that permitted by sections 130.170 to
130.188 shall be deemed a violation of section 105.1500.

2. The attorney general shall not disclose to the
public, or another government official not directly involved
in the investigation, information revealing the identity of
the entity under investigation or any donor to a tax-exempt
organization, unless the information is regarding the
identity of the entity or of a donor that engaged in conduct
prohibited by sections 130.170 to 130.188 after a final
determination has been made that the entity or donor
violated sections 130.170 to 130.188. The unlawful
disclosure of information revealing the identity of any
entity under investigation or donor to a tax-exempt
organization in connection with a committee shall be deemed
a violation of section 105.1500.

130.188. 1. (1) If the attorney general has
reasonable cause to believe that a person or entity has
engaged in, is engaging in, or is about to engage in, a
violation of sections 130.170 to 130.185, the attorney
general may execute in writing and cause to be served upon
any person who is believed to have information, documentary

material, or physical evidence relevant to the alleged or suspected violation, a civil investigative demand requiring such person to appear and testify, or to produce relevant documentary material or physical evidence or examination, at such reasonable time and place as may be stated in the civil investigative demand, concerning the subject matter of the investigation. Service of any civil investigative demand, notice, or subpoena may be made by any person authorized by law to serve process or by any duly authorized employee of the attorney general.

(2) In the process of a civil investigative demand being executed pursuant to subdivision (1) of this subsection, the provisions of sections 407.040 to 407.090 shall apply.

2. (1) If the attorney general has reasonable cause to believe that a committee, person, or other entity has engaged in, is engaging in, or is about to engage in, a violation of sections 130.170 to 130.185, the attorney general may bring a civil action to enforce sections 130.170 to 130.188. The provisions of section 130.054 and 105.957 to 105.963 shall not apply to violations of sections 130.170 to 130.188.

(2) A committee, person, or other entity alleged to have violated sections 130.170 to 130.188 shall be provided a notice of the civil action, with opportunity for discovery and opportunity to be heard as provided by law for civil actions generally before being found liable for a violation of sections 130.170 to 130.188.

(3) In all actions brought pursuant to this section, the burden of proof shall be on the attorney general.

(4) (a) Prior to discovery, the court shall set a hearing to determine if there is probable cause to believe

39 that a committee, person, or other entity has violated
40 sections 130.170 to 130.188.

41 (b) If, after the hearing, the court determines that
42 no probable cause exists to believe that a violation of
43 sections 130.170 to 130.188 has occurred, the court shall
44 enter an order of dismissal.

45 (c) If, after the hearing, the court determines that
46 probable cause does exist to believe that a violation of
47 sections 130.170 to 130.188 has occurred, the court shall
48 enter an order to that effect and the case should proceed to
49 trial on an expedited basis.

50 (5) Subject to the provisions of section 130.185, the
51 committee, person, or other entity alleged to have violated
52 sections 130.170 to 130.188 may, at a time to be determined
53 by the court prior to the scheduling of trial, present
54 evidence sufficient to rebut the probable cause finding by
55 making an ex parte presentation of records to the court for
56 in-camera review.

57 (6) A non-prevailing party under paragraph (c) of
58 subdivision (4) of this subsection has the right to:

59 (a) An interlocutory expedited appeal; and

60 (b) A stay of proceedings in the trial court.

61 3. (1) Within thirty days of a court finding that a
62 committee has violated sections 130.170 to 130.188, the
63 committee shall refund the contribution to the original
64 contributor. In the event of an appeal, the contribution
65 shall be placed in escrow, after which the funds shall be
66 disbursed in accordance with the final order.

67 (2) If the committee is unable to return the funds,
68 the directors, officers, or executive members of the
69 campaign committee shall be liable in their personal

70 capacity, jointly and severally, for the refund of said
71 funds.

72 4. Within thirty days of a court finding that a
73 committee, person, or other entity making an expenditure
74 covered by sections 130.170 to 130.188 has violated such
75 sections, the committee, person, or other entity shall
76 disgorge to the attorney general funds in an amount equal to
77 the reported cost of the expenditure. If the committee,
78 person, or entity is unable to disgorge the requisite funds,
79 the person or the directors, officers, or executive members
80 of the committee or other entity shall be liable in their
81 personal capacities, jointly and severally, for the payment
82 of the amount due. In the event of an appeal, the funds
83 subject to disgorgement shall be placed in escrow, after
84 which they shall be disbursed in accordance with the final
85 order.

86 5. If any lobbyist violates any of the provisions of
87 sections 130.170 to 130.188, the lobbyist's registration may
88 be revoked or suspended and the lobbyist may be enjoined
89 from receiving compensation or making expenditures for
90 lobbying.

91 6. If the attorney general prevails in an action
92 brought under this section, the court shall award:

93 (1) Injunctive relief sufficient to prevent the
94 defendant from violating sections 130.170 to 130.188 or
95 engaging in acts that aid or abet violations of such
96 sections; and

97 (2) Statutory damages up to twice the amount of the
98 prohibited contribution or expenditure.

99 7. In addition to the penalties in subsection 6 of
100 this section and any other remedies provided by law, if the
101 court finds a knowingly or willful violation of sections

102 130.170 to 130.188, the court may assess a penalty of up to
103 three times the statutory damages.

✓

VERIFICATION

STATE OF MISSOURI)

) ss.

COUNTY OF BOONE)Traci L. Wilson-Kleekamp

I, _____, being of lawful age, state under oath that I have read the PETITION FOR DECLARATORY AND INJUNCTIVE RELIEF AND APPLICATION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION and that the facts stated therein are true and correct to the best of my knowledge, information, and belief.

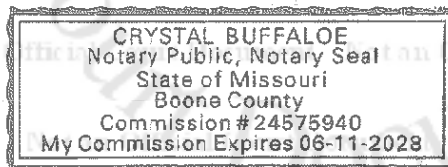
Traci L. Wilson-Kleekamp

Plaintiff

Traci L. Wilson-KleekampSubscribed and sworn before me this 3rd day of September 2025.Crystal Buffaloe

Notary Public

(SEAL)

My Commission Expires: 6-11-28

VERIFICATION

STATE OF MISSOURI)
) ss.COUNTY OF JacksonI, Patricia A. Jones, being of lawful age, state under oath that I have read the facts stated therein are true and correct to the best of my knowledge, information, and belief.Patricia A. Jones
PlaintiffSubscribed and sworn before me this 23 day of September 2025.Notary Public
(SEAL)ZINA LEWIS-RANSOM
Notary Public - Notary Seal
State of Missouri
Commissioned for Jackson County
My Commission Expires: June 21, 2027
10955409My Commission Expires: June 21, 2027Visit [UPS.com](https://www.ups.com)

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Domestic Shipments

- To qualify for the letter rate, UPS Express envelopes for correspondence, urgent documents, and/or electronic media must be 8 oz. or less. UPS Express envelopes containing items weighing more than 8 oz. will be billed by weight.

International Shipments

- The UPS Express envelope may be used only for documents and electronic media at a value. Certain countries consider electronic media at value. [ups.com/importexport](https://www.ups.com/importexport) to verify if your shipment is eligible.
- To qualify for the letter rate, the UPS Express envelope must weigh less than 8 oz. and the UPS Express envelope must weigh more than 8 oz. will be billed by weight.

Note: UPS Express envelopes are not recommended for electronic media containing sensitive personal information. Do not send cash or cash equivalent.

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

**NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
MISSOURI STATE CONFERENCE)
et. al.)**

Plaintiffs,

v.)

Case No.)

**MICHAEL KEHOE in his official)
capacity as Governor of Missouri)
et. al.)**

**REQUEST FOR TEMPORARY)
RESTRAINING ORDER AND)
PRELIMINARY INJUNCTION)**

Defendants)

PROPOSED TEMPORARY RESTRAINING ORDER WITHOUT NOTICE (Ex Parte)

NOW on this ____ day of September 2025, the Court, having reviewed Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction, the accompanying memorandum, affidavit(s), and exhibits, and being fully advised in the premises, finds that immediate and irreparable injury, loss, or damage will result to Plaintiffs if Defendants are not restrained. The Court further finds that providing notice to Defendants would allow them to accelerate or proceed with the challenged special session before the Court can act, thereby defeating the purpose of this Order. Pursuant to Rule 92.02(b) of the Missouri Rules of Civil Procedure, the Court concludes that issuance of this Temporary Restraining Order without notice is proper and necessary. The Court therefore makes the following findings:

1. Based on Plaintiffs' Verified Petition, supporting memorandum, and exhibits, the Court finds that **Plaintiffs have demonstrated a strong likelihood of success on the merits** of her

claims that Defendants' proceedings violate Article III, Section 45 and Article IV, Section 9, and constitutional due process protections under the Missouri Constitution.

1. **Plaintiff will suffer irreparable harm** if Defendants are allowed to proceed with or enforce impeachment or removal actions, including loss of Constitutionally protected voting rights. Additional harms include non-monetary harms such as the undue burden on interested parties to travel to Jefferson City for the public hearings and to participate in the legislative process outside of the usual timeframe, uncertainty in the district boundaries both for constituents and anyone interested in filing for office, and the undue burden on legislators created by an early return to Jefferson City.

2. Pursuant to Rule 92.02(b)(4), this Order shall expire ten (10) days from the date of issuance unless extended by the Court or replaced by a preliminary injunction following the scheduled hearing.

3. **The balance of equities favors Plaintiff**, as Defendants will suffer no undue hardship by being restrained from unlawful or procedurally defective actions, whereas Plaintiff and the electorate would suffer significant harm absent injunctive relief.

4. **The public interest supports injunctive relief** because preventing an unlawful, retaliatory impeachment preserves the democratic process, protects the will of the voters, and upholds transparency and constitutional governance.

5. **Pursuant to Rule 92.02(b)**, immediate issuance of this Temporary Restraining Order without notice is warranted due to the imminence of the scheduled impeachment hearing and the risk of irreparable harm if Defendants proceed.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED THAT:

1. Defendants, and all persons acting in concert with them are hereby restrained and enjoined from taking any action to proceed with, enforce, or conduct any impeachment or removal proceedings against Plaintiffs pending further order of this Court.

2. This Order shall remain in effect until a hearing on Plaintiffs' request for a preliminary injunction, which shall be held on the ____ day of _____, 2025, at : ____m., in Division ____ of this Court.

3. Pursuant to Rule 92.02(d), Plaintiff is not required to post bond because the Court finds that no monetary harm will result to Defendants by maintaining the status quo. Alternatively, if a bond is deemed necessary, it is hereby set at \$ ____.

4. Plaintiff shall promptly serve this Order upon Defendants via counsel of record, by certified mail and electronic mail (if available), and provide proof of service to the Court.

5. This Order is entered without prejudice to any party's rights or defenses and is intended solely to preserve the status quo pending further hearing.

SO ORDERED.

Dated this ____ day of September 2025._

JUDGE OF THE CIRCUIT COURT
Cole County, Missouri

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
MISSOURI STATE CONFERENCE)
et. al.)

Plaintiffs,)

v.)

Case No.)

MICHAEL KEHOE in his official)
capacity as Governor of Missouri)
et. al.)

REQUEST FOR TEMPORARY)
RESTRAINING ORDER AND)
PRELIMINARY INJUNCTION)

Defendants)

MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW the Plaintiffs, by and through counsel, and moves that Steve Waters of Waterland Litigation in Jefferson City, Missouri, who is not a party and is not less than 18 years of age, be appointed as special process server in the above case to serve the summons and petition for this case.

Respectfully Submitted,



Sharon Geuea Jones 64943
Jones Advocacy Group
227 Jefferson St.
Jefferson City, MO 65102
Phone: 573-808-2156
Email: sharon@jonesadvocacy.com

Nimrod T. Chapel, Jr. #46875
THE CHAPEL LAW GROUP LLC
311 West Dunklin

Jefferson City, MO 65101

Phone: 573-303-0405

Fax: 573-303-9709

Email: nimrod@chapellaw.com

C. Austin Reams #66825

REAMS LAW

9208 North Kelley Ave.

Oklahoma City, OK 73131

Telephone: 405-285-6878

Fax: 405-840-1164

Email: austin@reams.law

ATTORNEYS FOR PLAINTIFFS

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

**NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
MISSOURI STATE CONFERENCE)
et. al.)**

Plaintiffs,

v.)

Case No.)

**MICHAEL KEHOE in his official)
capacity as Governor of Missouri)
et. al.)**

**REQUEST FOR TEMPORARY)
RESTRAINING ORDER AND)
PRELIMINARY INJUNCTION)**

Defendants)

ORDER FOR PRIVE PROCESS SERVER

Upon application by Plaintiff, it is hereby:

ORDERED that Steve Waters of Waterland Litigation of Jefferson City, Missouri are hereby appointed to serve as a special process server for the purpose of serving the summons and petition in this case.

Date

Judge/Clerk

IN THE CIRCUIT COURT OF COLE COUNTY

STATE OF MISSOURI

NATIONAL ASSOCIATION FOR
THE ADVANCEMENT OF
COLORED PEOPLE, et. al.

Petitioner,

v.

Case No. 25AC-CC06724

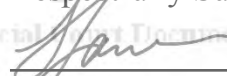
MIKE KEHOE, et. al.

Defendant.

ENTRY OF APPEARANCE

Comes now Sharon Geuea Jones and enters her appearance as attorney of record for National Association for the Advancement of Colored People, Patricia A. Jones Macklin, and Traci L. Wilson-Kleekamp, Plaintiffs, in the above-styled cause of action.

Respectfully Submitted,



Sharon Geuea Jones 64943

Jones Advocacy Group

227 Jefferson Street

Jefferson City, Missouri 65102

573-808-2156

sharon@jonesadvocacy.com

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
SERVICE EMAIL: nimrod@chapellaw.com

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
MISSOURI STATE CONFERENCE)
et. al.)
Plaintiffs,)

v.)

Case No. 25AC-CC06724

MICHAEL KEHOE in his official)
capacity as Governor of Missouri)
et. al.)
Defendants)

REQUEST FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION

ENTRY OF APPEARANCE

The undersigned, C. Austin Reams hereby enters his appearance as co-counsel of record
on behalf of Plaintiffs in the above-entitled matter.

I certify that I am admitted to practice before this court.

Respectfully submitted,

/s/C. Austin Reams

C. Austin Reams #66825

REAMS LAW

9208 North Kelley Ave.

Oklahoma City, OK 73131

Telephone: 405-285-6878

Fax: 405-840-1164

austin@reams.law

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 3rd day of September 2025, the foregoing was filed via the Missouri eFiling System and that a copy of the same was thus served via the electronic filing system in accordance with Supreme Court Rules.

/s/Nimrod T. Chapel, Jr.

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
MISSOURI STATE CONFERENCE)
et. al.)
Plaintiffs,)

v.)

Case No.)

MICHAEL KEHOE in his official)
capacity as Governor of Missouri)
et. al.)
Defendants)

REQUEST FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION

ORDER FOR PRIVATE PROCESS SERVER

Upon application by Plaintiff, it is hereby:

ORDERED that Steve Waters of Waterland Litigation of Jefferson City, Missouri are hereby appointed to serve as a special process server for the purpose of serving the summons and petition in this case.

09/04/2025

Date

Clerk

Mark A. Eichholz
zlf



Summons in Civil Case

IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI

Judge or Division: BRIAN K STUMPE	Case Number: 25AC-CC06724	
Plaintiff/Petitioner: NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE	Plaintiff's/Petitioner's Attorney/Address NIMROD THOMAS CHAPEL 311 W. DUNKLIN ST. JEFFERSON CITY, MO 65101	
vs.		
Defendant/Respondent: MICHAEL KEHOE	Court Address: PO BOX 1870 301 E HIGH ST JEFFERSON CITY, MO 65101	
Nature of Suit: CC Temporary Restraining Order		(Date File Stamp for Return)

The State of Missouri to: **MICHAEL KEHOE**
Alias:

**201 W. CAPITAL AVE., ROOM
216
JEFFERSON CITY, MO 65101**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

COURT SEAL OF



COLE COUNTY

04-SEP-2025

Date

/s/MarkEichholz/zf

Clerk

Further Information:

Officer's or Server's Return

Note to serving officer: Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).

☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date)
at _____ (time).

Printed Name of Officer or Server

Signature of Officer or Server

Must be sworn before a notary public if not served by an authorized officer.

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____
Date Notary Public

Service Fees (if applicable)

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



Summons in Civil Case

IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI

Judge or Division: BRIAN K STUMPE	Case Number: 25AC-CC06724	
Plaintiff/Petitioner: NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE	Plaintiff's/Petitioner's Attorney/Address NIMROD THOMAS CHAPEL 311 W. DUNKLIN ST. JEFFERSON CITY, MO 65101	
vs.		
Defendant/Respondent: MICHAEL KEHOE	Court Address: PO BOX 1870 301 E HIGH ST JEFFERSON CITY, MO 65101	
Nature of Suit: CC Temporary Restraining Order		(Date File Stamp for Return)

The State of Missouri to: **ANDREW BAILEY**

Alias:

**227 EAST HIGH ST.
JEFFERSON CITY, MO 65101**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

COURT SEAL OF



COLE COUNTY

04-SEP-2025

Date

/s/MarkEichholz/zf

Clerk

Further Information:

Officer's or Server's Return

Note to serving officer: Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).

☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date)
at _____ (time).

Printed Name of Officer or Server

Signature of Officer or Server

Must be sworn before a notary public if not served by an authorized officer.

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Service Fees (if applicable)

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



Summons in Civil Case

IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI

Judge or Division: BRIAN K STUMPE	Case Number: 25AC-CC06724	
Plaintiff/Petitioner: NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE	Plaintiff's/Petitioner's Attorney/Address NIMROD THOMAS CHAPEL 311 W. DUNKLIN ST. JEFFERSON CITY, MO 65101	
vs.		
Defendant/Respondent: MICHAEL KEHOE	Court Address: PO BOX 1870 301 E HIGH ST JEFFERSON CITY, MO 65101	
Nature of Suit: CC Temporary Restraining Order		(Date File Stamp for Return)

The State of Missouri to: **CINDY O'LAUGHLIN**
Alias:

**201 W. CAPITOL AVE., ROOM
326
JEFFERSON CITY, MO 65101**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

COURT SEAL OF



COLE COUNTY

04-SEP-2025

Date

/s/MarkEichholz/zf

Clerk

Further Information:

Officer's or Server's Return

Note to serving officer: Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).

☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date)
at _____ (time).

Printed Name of Officer or Server

Signature of Officer or Server

Must be sworn before a notary public if not served by an authorized officer.

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Service Fees (if applicable)

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



Summons in Civil Case

IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI

Judge or Division: BRIAN K STUMPE	Case Number: 25AC-CC06724	
Plaintiff/Petitioner: NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE	Plaintiff's/Petitioner's Attorney/Address NIMROD THOMAS CHAPEL 311 W. DUNKLIN ST. JEFFERSON CITY, MO 65101	
vs.		
Defendant/Respondent: MICHAEL KEHOE	Court Address: PO BOX 1870 301 E HIGH ST JEFFERSON CITY, MO 65101	(Date File Stamp for Return)
Nature of Suit: CC Temporary Restraining Order		

The State of Missouri to: **JON PATTERSON**
Alias:

**201 W. CAPITOL AVE., ROOM
308
JEFFERSON CITY, MO 65101**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

COURT SEAL OF



COLE COUNTY

04-SEP-2025

Date

/s/MarkEichholz/zf

Clerk

Further Information:

Officer's or Server's Return

Note to serving officer: Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).

☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date)
at _____ (time).

Printed Name of Officer or Server

Signature of Officer or Server

Must be sworn before a notary public if not served by an authorized officer.

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Service Fees (if applicable)

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

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

**MO STATE CONFERENCE OF THE)
NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
111 W HIGH)
JEFFERSON CITY, MO 65102)**

**PATRICIA A. JONES MACKLIN)
6022 BROOKLYN)
KANSAS CITY, MO 64130)**

**TRACI. L. WILSON KLEEKAMP)
2905 GREENBRIAR DR.)
COLUMBIA, MO 65203)**

Plaintiff,

v.)

Case No. 25AC-CC06724

**MIKE KEHOE in his official capacity)
as Governor of Missouri)**

**REQUEST FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

**Serve: Office of the Governor)
State Capitol, Rm. 216)
201 W Capitol Ave.)
Jefferson City, MO 65101)**

**ANDREW BAILEY in his official)
capacity as Attorney General of Missouri)**

**Serve: Office of the Attorney General)
227 East High St.)
Jefferson City, MO 65102)**

**CINDY O'LAUGHLIN in her official)
capacity as State Senator and President)
Pro Tem of the Senate)**

**Serve: Office of the Pro Tem)
State Capitol, Rm. 326)
201 W Capitol Ave.)
Jefferson City, MO 65101)**

**JON PATTERSON, in his official
capacity as State Representative and
Speaker of the House**)
)
)

**Serve: Office of the Speaker
State Capitol, Rm. 308
201 W Capitol Ave.
Jefferson City, MO 65101**)
)
)

**MOTION FOR TRO AND
PRELIMINARY INJUNCTION
(EXPEDITED AND EMERGENCY RELIEF REQUESTED)**

COMES NOW Plaintiffs the Missouri State Conference of the National Association for the Advancement of Colored People (“MO NAACP”) and Patricia A. Jones (“Jones”), and Traci Wilson-Kleekamp (“Wilson-Kleekamp”) by and through undersigned counsel, and submit this Brief in support of her Motion for Temporary Restraining Order (“TRO”) and Preliminary Injunction pursuant to Missouri Rule of Civil Procedure 92.02(a) and (d). Plaintiff seeks immediate relief to halt the State of Missouri (“State”), Governor Mike Kehoe (“Governor”), Attorney General Andrew Bailey (“Attorney General”), Senator and President Pro Tem of the Senate Cindy O’Laughlin (“Pro Tem”), and Representative and Speaker of the House Jon Patterson (“Speaker”) unlawful convening of an extraordinary session and enactment and/or presentation for signature to the Governor, any legislation, acts or rules related to the matters designated in the Governor’s Proclamation of August 29, 2025. Unless restrained, Defendants’ actions will cause irreparable harm to Plaintiff’s rights as voters. As demonstrated below, Plaintiff satisfies all factors required for injunctive relief under Missouri law.

I. INTRODUCTION

Defendant Governor is attempting to convene a special session of the legislature presided over by Defendants Pro Tem and Speaker. Plaintiffs bring this action for Declaratory Judgment

and Injunctive Relief, challenging the constitutionality of the Proclamation issued by the Governor on August 29, 2025 (“Proclamation”) convening the legislature for an extraordinary session. (Verified Petition, Ex. A.) The Proclamation was issued under the authority of Art. IV Sec. 9 of the Missouri Constitution and contains two general topic areas of consideration for the General Assembly – a new Congressional Map drafted under Article III Sec. 45 and new laws relating to initiative petitions. The Governor also issued a Press Release to explain his proclamation which included a proposed new Congressional Map. (Id.)

This appears to be a case of first impression in Missouri. Article IV, Section 9 of the Missouri Constitution grants the Governor authority to convene the legislature “on extraordinary occasions.” The question of what an “extraordinary occasion” under the Missouri Constitution has not been tested in the Courts.

Neither of the matters designated in the Proclamation reach the level of extraordinary occasion required by Art. IV Sec 9. Additionally, Plaintiffs contends that the Governor has no authority under either Art. IV Sec. 9 or Art. III Sec. 45 to request a new Congressional Map from the General Assembly without action from Congress. And the General Assembly likewise has no authority to enact legislation without action from Congress, and without an additional census, as required by the Missouri constitution.

Allowing an extraordinary session of the legislature, or the enactment of legislation establishing new congressional districts, when the Constitutionality of the Proclamation is in doubt creates irreparable harm in that the additional costs attributable to the legislative session is in excess of \$25,000 per day based on the per diem and mileage payments authorized by Sections 21.140 and 21.145. Additional irreparable harms may be created by the necessity for interested parties to travel to Jefferson City for the public hearings and to participate in the legislative process,

uncertainty in the district boundaries both for constituents and anyone interested in filing for office, and the undue burden on legislators created by an early return to Jefferson City.

Plaintiffs respectfully request that this Court issue a TRO to preserve the status quo halt the process of the General Assembly arising from the Governor's Proclamation, enter temporary restraining order and preliminary and permanent injunctions against the convening of the legislature for an extraordinary session based upon said Proclamation.

II. LEGAL STANDARD

A temporary restraining order and preliminary injunction are extraordinary remedies designed to prevent irreparable harm and preserve the status quo until the court can fully resolve the underlying claims. Under Missouri law, a TRO or preliminary injunction may issue where the movant demonstrates:

- a) A probability of success on the merits;
- b) A threat of irreparable harm absent relief;
- c) That the balance of harms favors the movant; and
- d) That relief is in the public interest.

State ex rel. Dir. of Revenue v. Gabbert, 925 S.W.2d 838, 839 (Mo. banc 1996).

Missouri courts have emphasized that “the primary purpose of a preliminary injunction is to maintain the status quo until the merits of the case can be determined.” *Ste. Genevieve Sch. Dist. R-II v. Bd. of Aldermen*, 66 S.W.3d 6, 11 (Mo. App. E.D. 2001). The status quo, in this context, is for the General Assembly to follow the Constitutionally mandated schedule and remain in recess until September 10, 2025 at which time it may consider matters vetoed by the Governor and then to recess again until January 7, 2025.

Further, Rule 92.02(a) of the Missouri Rules of Civil Procedure authorizes the issuance of a TRO “without written or oral notice to the adverse party or that party’s attorney” where “it clearly appears from specific facts shown by affidavit or verified petition that immediate and irreparable injury, loss or damage will result.” Because Defendants have set in motion an legislative and executive process, Plaintiffs faces imminent and irreparable harm unless this Court intervenes.

The issuance of an injunction in this case is also consistent with the well-settled principle that when government officials act outside of their lawful authority, courts are empowered to intervene to prevent irreparable harm. As the Missouri Court of Appeals stated: “An injunction is proper where a governmental body acts in excess of its statutory authority” *See City of Peculiar v. Hunt Martin Materials, LLC*, 274 S.W.3d 588, 591 (Mo. App. W.D. 2009).

III. ARGUMENT

A. Plaintiff is Likely to Succeed on the Merits.

Plaintiff can demonstrate a likelihood of success on the merits because Defendants’ coordinated call for a special session of the general assembly, unlawful convening of an extraordinary session for the enactment and/or presentation for signature to the Governor, violates the separation of powers.

Article II, section 1, of the Missouri Constitution, provides:

The powers of government shall be divided into three distinct departments—the legislative, executive and judicial—each of which shall be confided to a separate magistracy, *and no person, or collection of persons, charged with the exercise of powers properly belonging to one of those departments, shall exercise any power properly belonging to either of the others, except in the instances in this constitution expressly directed or permitted.*

The governor has the power to execute state laws. Art. IV, §§ 1 and 2. “The legislative power shall be vested in a senate and house of representatives to be styled ‘The General Assembly of the State of Missouri.’” Art. III, §1. Article III, section 21, provides: “No law shall be passed

except by bill, and **no bill shall be so amended in its passage through either house as to change its original purpose.**”

In *Missouri Coalition for the Environment v. Joint Committee on Admin. Rules*, 948 S.W.2d 125, 132-133 (Mo. banc 1997), the Missouri Supreme Court held:

This Court has consistently held that the doctrine of separation of powers, as set forth in Missouri's constitution, is "vital to our form of government," *State ex inf. Danforth v. Banks*, 454 S.W.2d 498, 500 (Mo. banc 1970), because it “prevent[s] the abuses that can flow from centralization of power.” *State Tax Comm’n v. Administrative Hearing Comm’n*, 641 S.W.2d 69, 73-74 (Mo. banc.1982). While “it was not the purpose [of the Constitution] to make a total separation of these three powers[, each branch of government] ought to be kept as separate from and independent from, each other as the nature of free government will admit, or as is consistent with that chain of connection which binds the whole fabric of the Constitution in one indissoluble bond of union and amity.” *Rhodes v. Bell*, 230 Mo. 138, 130 S.W. 465, 468 (1910). (citations omitted). The Missouri Constitution carefully divides the powers of government into three distinct and named departments; sedulously segregates each from the other; confides each to a separate magistracy; and then, not satisfied with such strict demarkation (sic) of the boundaries of their respective jurisdictions, peremptorily forbids either of such departments from passing the prohibitory precincts thus ordained by the exercise of powers properly belonging to either of the others, and then concludes by giving the sole exception to the unbending rule by saying, “except in the instances in this constitution expressly directed or permitted.” ... Lacking such express direction or express permission, the act done must incontinently be condemned as unwarranted by the constitution.... Each department of the government is essentially and necessarily distinct from the others, and neither can lawfully trench upon or interfere with the powers of the other; and our safety, both as to national and state governments, is largely dependent upon the preservation of the distribution of power and authority made by the constitution, and the laws made in pursuance thereof.

In *Missouri Coalition*, the Missouri Supreme Court found that legislation, which had granted a legislative agency to suspend and withdraw regulatory rules promulgated by an agency of the executive branch, violated constitutional provisions of separation of executive and legislative functions by 1) unconstitutionally interfering with the functions of the executive branch, and 2) circumventing the constitution’s bill passage and presentment requirements. *Id.* at 133.

The Missouri Court further held: “Article II, § 1 strictly confines the power of the legislature to enacting laws and **does not permit the legislature to execute laws already enacted.**” Id. (emphasis added). “**Once the legislature "makes its choice in enacting legislation, its participation ends.**” Id. at 134 (emphasis added).

Here, the Governor plainly does not have the constitutional authority to pass legislation, just as the legislature “may not unilaterally control execution of rulemaking authority after its delegation or rulemaking power ...” Id.

Article IV, section 9 provides:

The governor shall, at the commencement of each session of the general assembly, at the close of his term of office, and at such other times as he may deem necessary, give to the general assembly information as to the state of the government, and shall recommend to its consideration such measures as he shall deem necessary and expedient. **On extraordinary occasions he may convene the general assembly by proclamation, wherein he shall state specifically each matter on which action is deemed necessary.**

The legislature has exclusive authority to redistrict voting districts. Art. III, § 3. “Districts shall be **as nearly equal as practicable in population**, and shall be drawn on the basis of one person, one vote.” Id., § 3(b)(1). Districts created by the legislature drawn based on population must not deviate by more than one percent from the ideal population of the district. Id. “Districts shall be established in a manner so as to comply with all requirements of the United States Constitution and applicable federal laws, including, but not limited to, the Voting Rights Act of 1965 (as amended).” Id., § 3(b)(2).

Article III, section 45 provides:

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.

Here, no “extraordinary occasion” has occurred to justify the Governor’s call for a special session of the General Assembly, the

In April 2021, the US Census Bureau published the results of the decennial census and its reapportionment calculations starting the process of reapportionment and redistricting in all 50 States.

On March 1, 2022, House Bill 2909, was introduced to enact in lieu thereof twelve new sections relating to the composition of congressional districts, with an emergency clause. (Verified Petition, Exhibit A.) On May 9, 2022, House Bill 2909 was passed by the Missouri House. On May 11, 2022, House Bill 2909 was Truly Agreed and Finally Passed by the Senate. On May 18, 2022, House Bill 2909 was delivered to the Governor and was signed into law by the Governor on the same day. (Id.)

House Bill 2909 went into effect on May 18, 2022 and applied to the 118th Congress which election was to be held in November 2022. On November 8, 2022 an election for US Representatives was held with the district boundaries being those described in House Bill 2909. On November 5, 2024 an election for US Representatives was held with the district boundaries being those described in House Bill 2909.

There has been no act of the U.S. Congress indicating that Missouri regarding Missouri’s number of entitled representative, and there has not since been another census. Accordingly, the Missouri legislature is not authorized under Article III, section 45, of the Missouri Constitution to enact laws relative to the Missouri voting districts.

Nonetheless, on August 29, 2025, the Governor issued a Press Release announcing a Proclamation convening an extraordinary session of the legislature under Art. IV Sec. 9 for the

purpose of enacting legislation establishing updated congressional districts and amending the state's initiative petition process.

The Press Release contained several reasons for the Proclamation including “to ensure our districts and Constitution truly put Missouri values first.” The Press Release also contained a proposed “Missouri First Map” outlining a new set of Congressional Districts. The “Missouri First Map” is substantially different than the districts passed into law by House Bill 2909. The Proclamation convening the legislature into an extraordinary session lays out eleven “whereas” statements purporting to justify the reasoning for the Proclamation, including speculation that the current congressional district map may be vulnerable to a legal challenge. (Id.) Together these eleven statements provide the official justification that an extraordinary occasion exists. The Proclamation then convenes the legislature beginning at Noon on Wednesday, September 3, 2025 for two purposes, including “To enact legislation to establish new congressional districts for the State of Missouri,” and “To enact legislation to amend the state's initiative petition process...”

The Missouri legislature does not have constitutional authority under the circumstances because, inter alia, (1) the US Census Bureau has not issued new apportionment calculations since the April 2021 publication, and (2) on information and belief, the Governor has not received certified numbers from the House of the Congress of the United State triggering the processes of Art. III Sec. 45 after May 18, 2022 when the current district boundaries when into effect with House Bill 2909. By his Proclamation, the Governor is asking the Missouri legislature to do something that have constitutional authority to do under the circumstances, and which the legislature has previously done.

There apparently no Missouri case law which interprets the meaning of an “extraordinary occasion” regarding the Governor’s limited ability to call for a special session under Article IV,

section 9. The Missouri Supreme Court has held that the “primary rule of statutory interpretation is to give effect to legislative intent as reflected in the plain language of the statute at issue.” *Ivie v. Smith*, 439 S.W.3d 189, 202 (Mo. 2014). “Courts look elsewhere for interpretation only when the meaning is ambiguous or would lead to an illogical result that defeats the purpose of the legislation.” *Id.* “Statutory interpretation should not be hyper-technical, but reasonable and logical and should give meaning to the statute.” *Id.* at 203.

Prior proclamations by the Missouri Governor indicated that an “extraordinary occasion” included something like responding to a world-wide pandemic such as COVID-19, giving rise to the need for an expedited legislative session because the General Assembly was unable to meet in time to address such an emergency pertaining to public health. See Governor’s Proclamation, July 15, 2020, “due to the COVID-19 outbreak, the General Assembly was unable to meet ...” therefore “on the extraordinary occasion that exists in the State of Missouri,” See MO Register Vol. 45 No. 16 (pp. 1211-1296), August 17, 2020. The Governor previously indicated “additional immediate legislative measures must be taken to provide for the economic recovery from COVID-19 by providing liability protection ... on the extraordinary occasion that exists in the State of Missouri...” And see Executive Order, Governor’s Proclamation, Special Message, November 12, 2020, MO Register Vol. 45 No. 24 (pp. 1949-1998), Dec. 15, 2020; and Governor’s Proclamation, August 10, 2020, MO Register Vol. 45 No. 18 (p. 1333-1366) (regarding “unprecedented wave of violent crime existing in Missouri’s urban areas ... on the extraordinary occasion that exists...”). Other states such as Kentucky have concluded that an “extraordinary measure” includes an emergency threatening public health and welfare like the pandemic. *Beshear v. Acree*, 615 S.W.3d 780, 807 (Ky. 2020) (“the ‘extraordinary occasion’ ... of a global pandemic gives rise to an obvious emergency”).

Here, the primary and sole circumstance giving rise to the Governor's call of a special session is the naked political ambitions of U.S. President Donald Trump. Plaintiffs request that this Court take judicial notice numerous press reports, such as KCUR on August 29, 2025, attached hereto as Exhibit A:

President Trump has been pressuring Gov. Mike Kehoe to call a special session for mid-decade redistricting. Republican lawmakers hope to gerrymander congressional lines around Kansas City, diluting Democratic voting power and making it harder for Rep. Emanuel Cleaver to win in the 2026 midterms.

President Trump is the one who is actually calling for a special session. He does not have authority under the Missouri Constitution to do so. The political goal of a national political party, Republic Party, to sway and win the results of the mid-term elections so that persons, parties and interests outside of Missouri can stay in power, is certainly not an "extraordinary occasion." And that is plainly not a basis for the Missouri General Assembly to enact new legislation, particularly when it is for the benefit of non-Missourian citizens, persons, organizations, and interests.

Moreover, the other stated purposes of the Governor's Proclamation are largely moot, revealing the ulterior motives of these events. On December 1, 2024, then Senator Ben Brown introduced Senate Bill 152 entitled "AN ACT To amend chapter 130, RSMo, by adding thereto six new sections relating to campaign finance." (Verified Petition.) On March 27, 2025, Senate Bill 152 was passed by the Missouri Senate by a vote of 28 Ayes to 2 Noes. On May 15, 2025, Senate Bill 152 was Truly Agreed and Finally Passed by the House by a vote of 94 Ayes to 47 Noes. On July 9, 2025, Senate Bill 152 was signed into law by the Governor. Senate Bill 152 went into effect on August 28, 2025. Senate Bill 152 contained several provisions which restricted donations from foreign nationals and the use of foreign funds for the purposes of ballot measures. Missouri statutes make it a crime to fraudulently gather signatures for an initiative petition under Section 116.090 RSMo. Missouri provides an opportunity for public comment on every initiative

petition filed with the Secretary of State under Section 116.153 and 116.334 RSMo.. Missouri requires copies of the full text of each statewide ballot measure to be made available at each polling place under Section 116.290 RSMo. Thus, all but one of the actions deemed necessary by the Governor in the Proclamation appear to have already occurred.

B. Plaintiff Will Suffer Irreparable Harm Without Injunctive Relief.

The special session and proposed legislation would irreparably harm voting rights. Missouri citizens have a fundamental right to vote, which is established “with unmistakable clarity” by the Missouri Constitution. *Priorities USA v. State*, 591 S.W.3d 448 (Mo banc 2020), citing Art. 1, § 25, and Art. VIII, §2 of the Missouri Constitution. The goal of President Trump, and the Missouri Governor and legislature, is to “dilute Democratic voting power” and make it harder for Missouri Democrats to win in the 2016 midterms. (New Reports, Exhibit A.) Missouri courts recognize that undermining the will of the electorate causes harm to the public interest and cannot be remedied by damages. *See State ex rel. McClellan v. Kirkpatrick*, 504 S.W.2d 83, 85 (Mo. banc 1974) (protecting the public’s interest in fair and lawful elections).

Allowing an extraordinary session of the legislature when the Constitutionality of the Proclamation is in doubt also creates irreparable harm in that the additional costs attributable to the legislative session is in excess of \$25,000 per day based on the per diem and mileage payments authorized by Sections 21.140 and 21.145. Additional irreparable harms may be created by the necessity for interested parties to travel to Jefferson City for the public hearings and to participate in the legislative process, uncertainty in the district boundaries both for constituents and anyone interested in filing for office, and the undue burden on legislators created by an early return to Jefferson City.

Monetary damages cannot restore Plaintiff's voting rights and the public in a fair and just democracy. The only adequate relief is to enjoin the special session until a full hearing on the merits is conducted. As noted by the Missouri Supreme Court in *City of Kansas City v. New Power Co.*, 947 S.W.2d 877, 881 (Mo. App. W.D. 1997): "The inadequacy of a legal remedy and the need to prevent irreparable harm are the very foundation of equitable jurisdiction."

C. The Balance of Equities Favors Plaintiff.

The balance of equities, also referred to as the balancing of hardships, strongly favors granting injunctive relief because the harm to Plaintiffs and the public far outweighs any inconvenience or burden on Defendants, much less President Trump and the national Republican Party.

1. Defendants Suffer No Legitimate Harm by Following the Law

Missouri courts have emphasized that when defendants have no legal right to engage in the conduct sought to be enjoined, the balance of equities inherently favors the plaintiff. In *State ex rel. Reed v. Reardon*, 41 S.W.3d 470, 473 (Mo. banc 2001), the Missouri Supreme Court noted: "[e]quity will not permit a defendant to complain of harm resulting from being restrained from that which the law does not allow him to do."

Here, Defendants, who are actually motivated by the political will of non-Missourians such as President Trump, have no lawful right to demand a special session in Missouri for their own personal political fortunes. Enjoining the unlawful call for a special session, and the session itself, merely compels Defendants to adhere to the law, for the interest of Missouri voters and the Missouri Constitution itself, a burden they cannot claim as a harm.

2. Plaintiff Faces Severe and Irreversible Harm if No Injunction is Issued

If the TRO is denied, Plaintiffs will suffer irreparable injury through the loss of the elected office of Democrats, which Defendants publicly acknowledge is their goal. (Reports, Exhibit A.) As established in *Brown v. Weir*, 675 S.W.2d 135, 140 (Mo. App. W.D. 1984), the wrongful deprivation of an elected position is a “serious and irreparable” harm. The personal, professional, and political consequences for Plaintiffs are far more severe than any temporary administrative delay for Defendants.

3. Protecting the Status Quo Favors Plaintiff

The primary purpose of a TRO or preliminary injunction is to preserve the status quo pending a full trial on the merits. *State ex rel. Dir. of Revenue v. Gabbert*, 925 S.W.2d 838, 839 (Mo. banc 1996). Here, the status quo is maintaining the current voting map, previously presented to, and signed by, the Governor. Maintaining that status until the legality of the call for special session, the special session itself, and any resulting legislation, can be fully litigated prevents unnecessary disruption to voting rights.

4. Defendants’ Alleged “Harm” is Self-Inflicted

Defendants cannot claim hardship from being temporarily restrained because any claimed urgency or need for redistricting is non-existent, of their own making. The aforementioned Proclamation of the Governor imagines that “State of Missouri’s current congressional district map **may be** vulnerable to a legal challenge under the Voting Rights Act and the Fourteenth Amendment.” Defendants do not point to any actual legal challenge. Their own actions, arising solely out of the political ambitions of a U.S. President, are what gave rise to this litigation. Missouri courts routinely reject claims of hardship when the defendant’s predicament is self-inflicted. *See City of Kansas City v. New Power Co.*, 947 S.W.2d 877, 881 (Mo. App. W.D. 1997) (equity favors the party who “seeks to prevent unlawful conduct, rather than the one attempting to

justify it”).

5. Equities Also Favor the Voters and Public Confidence

The voters of Missouri have a vested interest in the continuity and integrity of their elected offices. Enjoining an unlawful call for special session, and the special session itself, protects both Plaintiffs and the democratic process. In *State ex rel. McClellan v. Kirkpatrick*, 504 S.W.2d 83, 85 (Mo. banc 1974), the Court recognized that equity must weigh not only the individual rights at stake but also the public’s interest in fair governance. Here, the balance strongly tips toward preserving the will of the electorate.

D. The Public Interest Supports Injunctive Relief.

The public interest factor overwhelmingly supports granting a TRO and preliminary injunction because preventing an unlawful special session, and unlawful redistricting, preserves democratic governance, the integrity of elections, and the public’s trust in government institutions.

1. Protecting the Will of the Voters

The Missouri Constitution guarantees that “all political power is vested in and derived from the people” (Mo. Const. art. I, § 2) and that elections “shall be free and open” (art. I, § 25). Courts recognize that undermining the will of the voters is contrary to the public interest unless done strictly according to law. In *Halderman v. City of Sturgeon*, 670 S.W.3d 193, 199 (Mo. App. W.D. 2023), the court held that elected officials cannot be removed except by strict adherence to statutory requirements. Here, the brazen purpose of the call for a special session, and the special session itself, is to exclude previously elected officials and dilute the voting power of Missourians. Enjoining Defendants’ unlawful actions and plans protects this fundamental democratic choice.

2. Upholding Constitutional Protections Enhances Public Confidence

Missouri courts have long recognized that when government bodies act outside the scope of their authority, public trust erodes. As the court noted in *State ex rel. Ellis v. Brown*, 326 S.W.2d 752, 754 (Mo. App. 1959), courts must act to “restrain unlawful acts of municipal officials which affect the rights of the public.” By issuing a TRO, this Court will reinforce the principle that government actions must comply with the rule of law.

3. No Harm to Public Administration by Granting Relief

The requested injunction does not impede governmental operations. Rather, it enforces the limitations placed on the legislature and executive branches by the Missouri Constitution. Defendants suffer no harm by temporarily halting the call for special session and special session until the merits can be fully adjudicated. Conversely, allowing a procedurally them to proceed would cause confusion, instability, and litigation costs, undermining the public’s interest in orderly and lawful government.

IV. CONCLUSION AND PRAYER FOR RELIEF

For the reasons set forth above, Plaintiffs have demonstrated a clear and compelling likelihood of success on the merits of their claims and their constitutional rights under the Missouri Constitution. Defendants’ actions and plans are unconstitutional and procedurally defective, undertaken in open disregard of established statutory mandates and due process protections. Without immediate injunctive relief, Plaintiffs will suffer irreparable harm, including the unlawful injuries to their voting rights, and the disenfranchisement of Missouri citizens. The balance of equities and the public interest weigh heavily in favor of preserving the status quo, ensuring compliance with Missouri law, and upholding the voters’ will and the democratic process.

WHEREFORE, Plaintiffs respectfully requests that this Court issue a Temporary Restraining Order pursuant to Rule 92.02(a) enjoining Defendants from proceeding with the

unlawful call for a special session of the general assembly, unlawful convening of an extraordinary session and unlawful enactment and/or presentation for signature to the Governor, any legislation, acts or rules related to the redistricting of the Missouri's Congressional districts. Plaintiffs request and that the Court set this matter for an expedited hearing on her request for a Preliminary Injunction under Rule 92.02(d), maintaining the TRO in effect until the legality of Defendants' actions can be adjudicated. Plaintiffs further request that the Court declare Defendants' call for special session, any special session and legislation arising therefrom or presented to the Governor, void and unconstitutional, and violative of Plaintiffs constitutional rights. Finally, Plaintiff prays that this Court grant such other and further relief as it deems just, equitable, and proper under the circumstances.

Respectfully submitted,

/s/ Nimrod Chapel, Jr.

Nimrod T. Chapel, Jr., #46875

Chapel Law Group, LLC

311 West Dunklin Street

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Telephone: 573-303-0405

Facsimile: 573-303-9709

Email: nimrod@chapellaw.com

C. Austin Reams #66825

REAMS LAW

9208 North Kelley Ave.

Oklahoma City, OK 73131

Telephone: 405-285-6878

Fax: 405-840-1164

Email: austin@reams.law

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

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The undersigned hereby certifies that on this 4th day of September 2025, the foregoing was filed via the Missouri eFiling System and that a copy of the same was thus served via the electronic filing system in accordance with Supreme Court Rules.

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IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF COLORED)
PEOPLE MISSOURI STATE)
CONFERENCE)

Case No. 25AC-CC06724

Plaintiffs,)

v.)

Michael KEHOE, et al.,)

Defendants.)

ENTRY OF APPEARANCE

Louis J. Capozzi III, Solicitor General for the State of Missouri, and Peter F. Donohue Sr., Deputy Director of Special Litigation enter their appearances on behalf of Defendant Governor Kehoe, in his official capacity as Governor of Missouri, and on behalf of State Defendants who tender representation to the Attorney General.

Dated: September 4, 2025

Respectfully submitted,

ANDREW BAILEY
ATTORNEY GENERAL

/s/ Peter F. Donohue Sr.

Louis J. Capozzi III, #77756

Solicitor General

Peter F. Donohue Sr., #75835

Deputy Director of Special Litigation

Office of the Attorney General

Old Post Office Building

815 Olive St, Suite 200

St. Louis, MO 63101

Office: (314) 340-3413

Counsel for Defendants

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
SERVICE EMAIL: nimrod@chapellaw.com

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF COLORED)
PEOPLE MISSOURI STATE)
CONFERENCE)

Case No. 25AC-CC06724

Plaintiffs,)

v.)

Michael KEHOE, et al.,)

Defendants.)

DEFENDANTS' OPPOSITION TO PLAINTIFFS' REQUEST FOR *EX PARTE*
TEMPORARY RESTRAINING ORDER OR, IN THE ALTERNATIVE,
MOTION FOR BRIEFING ON REQUESTED TEMPORARY RESTRAINING
ORDER

“Article II, § 1 of the Missouri Constitution ‘provides for the separation of power into three distinct departments—legislative, executive, and judicial—and prohibits the exercise of power properly belonging to one of those departments from being exercised by another.’” *Williams v. Falkenrath*, 676 S.W.3d 452, 459 (Mo. App. W.D. 2023) (quoting *State v. Raccagno*, 530 S.W.2d 699, 703 (Mo. 1975)). Here, Plaintiffs request this Court shatter that separation, inviting this Court to thwart Missouri’s democratic process. Seeking an astonishing and unprecedented intrusion upon Missouri’s constitutional structure and the long-established prerogatives of the Governor and the General Assembly, Plaintiffs request an *ex parte* order to “prohibit[] Defendants Pro Tem and Speaker from calling the legislature into session based on the Proclamation,” Pls. Pet. at ¶ 87(A), which would “interfere impermissibly with the other[s]’ performance of [their] constitutionally assigned

power[s].” *State Auditor v. Joint Comm. on Legislative Rsch.*, 956 S.W.2d 228, 231 (Mo. banc 1997) (quoting *I.N.S. v. Chadha*, 462 U.S. 919, 963 (1983) (Powell, J., concurring)). Essentially, Plaintiffs aim to stymie the Governor and General Assembly’s core lawmaking functions through a judicial order which—as far as Defendants know—has *never* been granted in Missouri history.

Even worse, Plaintiffs assault these fundamental foundations of the Missouri Constitution through the vehicle of an *ex parte* Rule 92 temporary restraining order (“TRO”), depriving the State of its opportunity to be heard. Rule 92.02 imposes “strict limits on *ex parte* motions.” *CNS Int’l Ministries, Inc. v. Bax*, 2025 WL 671060, at *17, n.10 (E.D. Mo. Mar. 3, 2025). In particular, such orders cannot issue unless plaintiffs prove that “notice cannot be given.” Mo. R. RCP § 92.02(b)(2). And that is clearly not true here. Plaintiffs knew how to contact the State. They declined to do so, instead opting for a highly-disfavored *ex parte* TRO to short-circuit the State’s ability to respond and to defend the Missouri Constitution. Plaintiffs have *no* basis to undercut due process in this matter. *See, e.g., Granny Goose Foods, Inc. v. Brotherhood of Teamsters*, 415 U.S. 423, 439 (1974) (noting “fact that our entire jurisprudence runs counter to the notion of court action taken before reasonable notice and an opportunity to be heard has been granted both sides of a dispute”).

Consequently, the Court can, and should, summarily deny Plaintiffs’ motion. But at the very least, Defendants respectfully request that this Court set an appropriate briefing schedule on Plaintiffs’ request for a temporary restraining order, as well as on their requests for declaratory and injunctive relief.

Respectfully submitted,

ANDREW BAILEY

ATTORNEY GENERAL

/s/ Louis J. Capozzi, III

Louis J. Capozzi III, #77756

Solicitor General

Peter F. Donohue Sr., #75835

Deputy Director of Special Litigation

Office of the Attorney General

Old Post Office Building

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St. Louis, MO 63101

Office: (314) 340-3413

Counsel for Defendants

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
SERVICE EMAIL: nimrod@chapellaw.com

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

**MO STATE CONFERENCE OF THE)
NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE, et. al.)**

Plaintiffs,)

v.)

Case No. 25AC-CC06724

MIKE KEHOE et.al.)

Defendants)

**PLAINTIFFS' REPLY TO DEFENDANTS' OPPOSITION TO
PLAINTIFF'S REQUEST FOR EX PARTE TEMPORARY RESTRAINING ORDER**

Defendants incorrectly claim that the separation of powers doctrine prevents this Court from entering an order restraining the Executive and Legislative Branches from exceeding their Constitutional Authority. On the contrary, the Court is explicitly given authority to make determinations regarding the rights and remedies in cases such as this and to restrain action pending a determination on the merits.

Art. II Sec. 1 of the Missouri Constitution does in fact give specific powers and authority to each Branch of the Government. In fact, part of that grant of power is to grant the authority to “make final determinations of questions of law.” State ex rel. Praxair, Inc. v. Mo. Pub. Serv. Comm’n, 344 S.W.3d 178, 186 (Mo. banc 2011). The Legislature has also granted authority to the courts to make determinations regarding rights and remedies. § 527.010 RSMo.. Additionally, the Legislature had granted through statute the ability for the Courts to restrain action pending a determination on the merits in cases involving rights and remedies. § 526.050 RSMo..

While the ability to convene the legislature on “extraordinary occasions” is granted to the Governor and the authority to draw congressional boundaries and pass laws generally are granted to the General Assembly generally, this authority is not boundless and absolute. Article II, Section 1 “does not erect an impenetrable wall of separation between the departments of government.” *Chastain v. Chastain*, 932 S.W.2d 396. The idea of judicial review and the concept of the Courts determining the Constitutionality of actions of the other Branches is well established dating back as far as *Marbury v. Madison*, 5 U.S. 137 (1803). It is highly irregular for the Defendants to suggest this Court has no ability to review the Governor’s actions in convening the legislature based on Art. IV Sec. 9.

Defendants cite to two cases to support their request to deny the Plaintiffs’ requests for injunctive relief. The first case, *Williams v. Falkenrath* 676 SW3d 452, does not apply to the facts before the court. That case is a specific to the lack of authority for the courts to establish new sentencing standards in conflict with those passed by the legislature. Here, Plaintiffs are requesting the Court to fulfill its role as interpreter of the Constitution. The second case, *State Auditor v. JCLR* 956 SW2d 228 is a case that actually affirms the ability for the court to do what Plaintiffs request. The court in that case determined the legislature did not have the authority to interfere with clearly defined governmental process. Here we are asking the Court to do the same and determine the authority and boundaries of the provisions of Art. IV Sec. 9 and Art. III Sec. 45.

What Plaintiffs have placed before the Courts is a clear request for interpretation of Constitutional provisions. The only questions before the Court today are whether to prevent irreparable harm while the questions on the merits of Plaintiffs’ claims are pending and whether the Court has the authority to hear Plaintiffs’ claims.

Plaintiff has already briefed the elements of the request for injunctive relief. Above are the clear reasons why the Court may certainly act on Plaintiffs' request.

The Court should quickly grant Plaintiffs' request for Temporary and Preliminary injunctions and set the case for a hearing on the merits as soon as possible.

Respectfully Submitted,

/s/ Sharon Geuea Jones

Sharon Geuea Jones 64943

Jones Advocacy Group

227 Jefferson St.

Jefferson City, MO 65102

Phone: 573-808-2156

Email: sharon@jonesadvocacy.com

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 5th day of September 2025, the foregoing was filed via the Missouri eFiling System and that a copy of the same was thus served via the electronic filing system in accordance with Supreme Court Rules.

/s/Sharon Geuea Jones

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
SERVICE EMAIL: nimrod@chapellaw.com

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
SERVICE EMAIL: peter.donohue@ago.mo.gov

STATE OF MISSOURI
FOR THE NINETEENTH JUDICIAL CIRCUIT
COLE COUNTY, MISSOURI

NATIONAL ASSOCIATION FOR)
THE ADVANCEMENT OF COLORED)
PEOPLE MISSOURI STATE)
CONFERENCE; PATRICIA A.)
JONES and TRACI L. WILSON)
KLEEKAMP,)

Plaintiffs,)

-vs-)

No. 25AC-CC06724

MICHAEL KEHOE, *in his official*)
capacity as Governor of Missouri;)
ANDREW BAILEY, *in his official*)
capacity as Attorney General of)
Missouri; CINDY O'LAUGHLIN in)
her official capacity as State Senator)
and President Pro Tem of the Senate;)
and JON PATTERSON, *in his official*)
capacity as State Representative and)
Speaker of the House,)

Defendants.)

ENTRY OF APPEARANCE

Solicitor General Louis J. Capozzi, III enters his appearance on behalf of
Defendants.

Dated: September 6, 2025

Respectfully submitted,

ANDREW BAILEY

Missouri Attorney General

/s/ Louis J. Capozzi, III

Louis J. Capozzi, III #77756

Solicitor General

Office of Missouri Attorney General

207 West High St.

Jefferson City, MO 65101

(573) 751-7890

Louis.Capozzi@ago.mo.gov

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2025, the foregoing Entry of Appearance was filed electronically using the Court's CM/ECF system, which sends notification to all counsel of record.

/s/ Louis J. Capozzi III

Louis J. Capozzi III

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
 SERVICE EMAIL: nimrod@chapellaw.com

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
 SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: SHARON GEUEA JONES, Attorney for Plaintiff
 SERVICE EMAIL: sharon@jonesadvocacy.com

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

MO STATE CONFERENCE OF THE)
NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE, et. al.)

Plaintiffs,)

v.)

Case No. 25AC-CC06724

MIKE KEHOE et.al.)

Defendants)

APPLICATION FOR CHANGE OF JUDGE

Comes now Plaintiffs by and through undersigned counsel, and requests a change of judge
in the above-styled matter pursuant to Supreme Court Rule 51.05.

Respectfully Submitted,

/s/ Sharon Geuea Jones

Sharon Geuea Jones 64943

Jones Advocacy Group

227 Jefferson St.

Jefferson City, MO 65102

Phone: 573-808-2156

Email: sharon@jonesadvocacy.com

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 8th day of September 2025, the foregoing was
filed via the Missouri eFiling System and that a copy of the same was thus served via the electronic
filing system in accordance with Supreme Court Rules.

/s/Sharon Geuea Jones

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
SERVICE EMAIL: nimrod@chapellaw.com

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
SERVICE EMAIL: peter.donohue@ago.mo.gov

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI
19TH JUDICIAL CIRCUIT

MO STATE CONFERENCE OF THE)
NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED LPEOPLE, et. al.)
Plaintiffs,)

vs.)

Cause No. 25AC-CC06724

MIKE KEHOE, et al.)
Defendants.)

Date of Proceeding: _____

Nature of Proceeding: _____

Appearances: _____

Attorney For: _____

☐ Docket Sheet Entry ☒ Order ☐ Judgment ☐ Stipulation ☐ Other

☐ As Follows ☐ Attached Hereto ☐ Agreed to By: _____

Plaintiffs' Application for Change of Judge is sustained. Cause transferred to Presiding Judge for reassignment.

Submitted By: _____

Attorney For: _____

SO ORDERED this 8th day of SEPTEMBER, 2025.


Judge

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI
19TH JUDICIAL CIRCUIT

DIVISION II

NAACP, ET AL

Petitioner,

vs.

Cause No. 25AC-CC06724

MIKE KEHOE, ET AL

Respondent.

Date of Proceeding: _____

Nature of Proceeding: _____

Appearances: _____

Attorney For: _____

☐ Docket Sheet Entry ☒ Order ☐ Judgment ☐ Stipulation ☐ Other

☐ As Follows ☐ Attached Hereto ☐ Agreed to By: _____

Division(s) I has/have been disqualified.

Case assigned to Division: _____

IV - Judge Limbaugh

Submitted By: _____

Attorney For: _____

SO ORDERED this 9 day of Sept, 2025.

Judge

STATE OF MISSOURI
FOR THE NINETEENTH JUDICIAL CIRCUIT
COLE COUNTY, MISSOURI

NATIONAL ASSOCIATION FOR)
THE ADVANCEMENT OF COLORED)
PEOPLE MISSOURI STATE)
CONFERENCE; PATRICIA A.)
JONES and TRACI L. WILSON)
KLEEKAMP,)

Plaintiffs,)

-vs-)

No. 25AC-CC06724

MICHAEL KEHOE, *in his official*)
capacity as Governor of Missouri;)
ANDREW BAILEY, *in his official*)
capacity as Attorney General of)
Missouri; CINDY O'LAUGHLIN in)
her official capacity as State Senator)
and President Pro Tem of the Senate;)
and JON PATTERSON, *in his official*)
capacity as State Representative and)
Speaker of the House,)

Defendants.)

ENTRY OF APPEARANCE

Assistant Solicitor General Joseph James Maurey Kiernan enters his
appearance on behalf of Defendants.

Dated: September 9, 2025 Respectfully submitted,

CATHERINE HANAWAY
Missouri Attorney General
/s/ Joseph James Maurey Kiernan

Joseph James Maurey Kiernan #77798

Assistant Solicitor General

Office of Missouri Attorney General

815 Olive Street, Suite 200

St. Louis, Missouri 63101

(573) 690-2426

Joseph.Kiernan@ago.mo.gov

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2025, the foregoing Entry of Appearance was filed electronically using the Court's CM/ECF system, which sends notification to all counsel of record.

/s/ Joseph James Maurey Kiernan

Joseph James Maurey Kiernan

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

**MO STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF
COLORED PEOPLE, et. al.**

Plaintiffs,

v.

Case No. 25AC-CC06724

MIKE KEHOE et.al.

Defendants

NOTICE OF HEARING

Plaintiffs hereby provide notice that they will call up for hearing their Motion for Temporary Restraining Order and Preliminary Injunction on September 11, 2025 at 1:30 p.m. or as soon thereafter as she may be heard. Plaintiff also requests Webex be made available for parties who are unable to appear in person.

Respectfully submitted,

/s/ Sharon Geuea Jones

Sharon Geuea Jones 64943

Jones Advocacy Group

227 Jefferson St.

Jefferson City, MO 65102

573-808-2156

sharon@jonesadvocacy.com

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that on September 9, 2025 the foregoing was filed electronically with the Clerk of the Court, and served via special process server on all parties.

/s/ Sharon Geuea Jones

Attorney for Plaintiff

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
SERVICE EMAIL: nimrod@chapellaw.com

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant
SERVICE EMAIL: louis.capozzi@ago.mo.gov

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF COLORED)
PEOPLE MISSOURI STATE)
CONFERENCE, et. al.,)

Case No. 25AC-CC06724

Plaintiffs,)

v.)

Michael KEHOE, et al.,)

Defendants.)

**DEFENDANTS' OPPOSITION TO NOTICE OF HEARING AND MOTION
FOR BRIEFING SCHEDULE ON PETITION FOR DECLARATORY
JUDGMENT AND INJUNCTIVE RELIEF**

Defendants strongly oppose the scheduling of a hearing on Thursday, September 11, 2025—*less than two days* from now. Instead, Defendants restate their prior motion to schedule a briefing schedule addressing Plaintiffs' request for a temporary restraining order.

Holding a hearing on Thursday regarding the merits of Plaintiffs' request would highly prejudice Defendants in several respects. *First*, the Solicitor General will be out of the State until Monday, September 15, due to previously scheduled state business. Forcing Defendants to proceed without their lead counsel would be imprudent.

Second, Defendants deserve a fair opportunity to file a brief against Plaintiffs' remarkable and unprecedented request for a temporary restraining order against the

General Assembly meeting in special session. “Full briefing” is encouraged in order to give all parties the opportunity to aid the court in reaching a proper decision.” *State ex rel. Bollinger v. Bernstein*, 501 S.W.3d 570, 572 n.3 (Mo. App. S.D. 2016) (quoting *State ex rel. Neal v. Karl*, 627 S.W.2d 913, 914 (Mo. App. W.D. 1982)). Following that standard practice is especially appropriate in this case, where Plaintiffs are asking this Court to enjoin the General Assembly from meeting—a remedy that Defendants believe has *never* been granted in state history and that would profoundly damage the separation of powers. *See State ex rel. Abel v. Gates*, 89 S.W. 881, 884 (Mo. 1905) (“It is not within the power of the judiciary . . . to enjoin the General Assembly from passing a proposed statute or compel it by mandamus to do so.”). Additionally, Plaintiffs lack standing—as they challenge a statute that has not even been passed yet. And their state constitutional claims are utterly meritless. Defendants request an appropriate amount of time to file a brief making these points.

Third, Plaintiffs should not be rewarded for their dubious litigation tactics. To start, they filed a request for an *ex parte* temporary restraining order against the State—a litigant they obviously know how to contact. That fact renders their request for a temporary restraining order patently improper. *See, e.g., Granny Goose Foods, Inc. v. Brotherhood of Teamsters & Auto Truck Drivers Local No. 70 of Alameda County*, 415 U.S. 423, 439 (1974) (noting “fact that [the Court’s] entire jurisprudence runs counter to the notion of court action taken before reasonable notice and an opportunity to be heard has been granted both sides of a dispute”); *CNS Int’l Ministries, Inc. v. Bax*, 2025 WL 671060, at *17, n.10 (E.D. Mo. Mar. 3, 2025) (noting

that Rule 92.02 imposes “strict limits on *ex parte* motions”). Plaintiffs—who are urging the need for immediate, rash action—also filed for a change of judge: an action they are entitled to take but that simultaneously suggests immediate action is not required. They have also moved for a hearing in less than two days—without contacting the State’s lead counsel and despite another state lawyer telling them that Thursday would not work for a hearing.

For the reasons previously stated, the Court can and should summarily deny Plaintiffs’ request for an *ex parte* temporary restraining order. In no event should the Court hold a hearing in *less than two days* on the merits of Plaintiffs’ inappropriate motion. Instead, the Court should set an appropriate briefing schedule and only then set a hearing.

Respectfully submitted,

CATHERINE L. HANAWAY
ATTORNEY GENERAL

/s/ Louis J. Capozzi, III

Louis J. Capozzi III, #77756

Solicitor General

Peter F. Donohue Sr., #75835

Deputy Solicitor General and Deputy

Director of Special Litigation

Joseph J. Kiernan, #77798

Assistant Solicitor General

Office of the Attorney General

Old Post Office Building

815 Olive St, Suite 200

St. Louis, MO 63101

Office: (314) 340-3413

Counsel for Defendants

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was filed and served electronically on all counsel of record via the Court's e-filing system on September 9, 2025.

/s/Louis J. Capozzi, III

Solicitor General

Counsel for Defendants

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
SERVICE EMAIL: nimrod@chapellaw.com

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: SHARON GEUEA JONES, Attorney for Plaintiff
SERVICE EMAIL: sharon@jonesadvocacy.com

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

**MO STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF
COLORED PEOPLE, et. al.**

Plaintiffs,

v.

Case No. 25AC-CC06724

MIKE KEHOE et.al.

Defendants

REPLY TO DEFENDANTS' OPPOSITION TO PLAINTIFFS' NOTICE OF HEARING

The primary claims in this case are extremely time sensitive. The Plaintiffs assert that the Proclamation of Governor Kehoe convening the General Assembly under Art. IV Sec. 9 exceeds his authority under that provision of the Missouri Constitution. If this case is not heard quickly the General Assembly will have fully acted before the merits of the claim can be heard. This could mean additional confusion and waste as any legislation passed during an unlawfully called extraordinary session will be invalid. *State ex rel. Department of Penal Institutions v. Becker*, 47 S.W.2d 781 (Mo. 1932).

At Noon on Wednesday, September 3, 2025, the Missouri House convened pursuant to the Governor's Proclamation in a "Technical Session." Several pieces of legislation were introduced and First Read at that time. At 10 o'clock AM on Thursday, September 4, 2025, the Missouri House again met in a "Technical Session" to Second Read several pieces of legislation. Later that same morning, House Bill 1 (HB1) and House Joint Resolution 3 (HJR3) were referred to their respective legislative committees. The House Special Committee on Redistricting and the House Elections Committee had previously noticed up a hearing on HB1 and HJR3 respectively pending their referral. At Noon on September 4, 2025, the House Special Committee on Redistricting held a hearing on HB1. At 1 o'clock PM on September 4, 2025, the House Elections Committee held a hearing on HJR3. The legislation was voted out of their respective committees immediately following the hearings. The House Rules-Legislative Committee met at 9am on September 5, 2025, with a short recess at 10am for the "Technical Session," and voted out both HB1 and HJR3. At 10am on September 5, 2025, the House held another "Technical Session" to receive the vote reports from the House Special Committee on

Redistricting and the House Elections Committee, at which time HB1 and HJR3 were referred to the House Rules-Legislative Committee. The House then adjourned for the weekend with another “Technical Session” on Sunday to allow for the legislation to continue to progress while the legislators returned to their homes. At 2 o’clock PM on Monday, September 8, 2025, the House came to order to debate and “Perfect” both pieces of legislation. At 9 o’clock AM on Tuesday, September 9, 2025, the same day this motion and the Notice of Hearing were filed, the House “Third Read” both pieces of legislation and prepared to send them to the Senate for their consideration. The Senate intends to convene pursuant to the Governor’s Proclamation after their Constitutionally mandated Veto Session some time after Noon on Wednesday, September 10, 2025.

Confusion over the time of referral and vote of the House Rules-Legislative Committee, aside, the intention of the House to move as quickly as possible with as many time saving procedural moves as possible. The Senate is unlikely to move slower. Even a week’s delay in the hearing of this case would mean that the validity of Governor’s Proclamation would not have been determined until after the General Assembly adjourns from the extraordinary session convened pursuant thereto.

The Defendants’ complain of prejudice in Plaintiffs’ attempts to move this case quickly. To the contrary, Plaintiffs’ are attempting to slow down the legislative process so the merits of their claim that the Governor has exceeded his authority can be fully and properly litigated. Plaintiffs’ are anticipating a full briefing on the merits of their claims, but this briefing is best done when the very processes they claim are an overreach of the Governor’s authority are not ongoing. The lack of quick action on the case has already meant that the process of the extraordinary session is half complete. Failure to act at this point, is a miscarriage of justice in that it could deny the Plaintiffs any opportunity to be heard.

Plaintiffs’ counsel attempted to reach out to Defendants’ counsel in good faith to give them time to arrange an appearance. Defendants’ counsel is the Attorney General’s office with a number of attorneys who practice in this area of the law on a regular basis and fully understand the time-sensitive nature of the case. If the entirety of the State’s legal apparatus is unable to appear with more than 24 hours notice, then an order based on the pleadings enjoining any further action from the General Assembly based upon the provisions of the Governor’s Proclamation would allow for a briefing schedule and fuller review of the claims. This would allow parties to work out a briefing schedule and give the Court time to fully review the issue without creating delays that could deny the Plaintiffs’ a hearing of their claims on the merits.

Plaintiffs request the court to hold the hearing as noticed or in the alternative, grant their requested injunctions and set the case for briefing and a hearing on the merits.

Respectfully submitted,
/s/ Sharon Geuea Jones
Sharon Geuea Jones 64943
Jones Advocacy Group
227 Jefferson St.
Jefferson City, MO 65102
573-808-2156
sharon@jonesadvocacy.com

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that on September 9, 2025 the foregoing was filed electronically with the Clerk of the Court, and served via special process server on all parties.

/s/ Sharon Geuea Jones
Attorney for Plaintiff

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
 SERVICE EMAIL: nimrod@chapellaw.com

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
 SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant
 SERVICE EMAIL: louis.capozzi@ago.mo.gov



Summons in Civil Case

IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI

Judge or Division: BRIAN K STUMPE	Case Number: 25AC-CC06724	
Plaintiff/Petitioner: NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE	Plaintiff's/Petitioner's Attorney/Address NIMROD THOMAS CHAPEL 311 W. DUNKLIN ST. JEFFERSON CITY, MO 65101	
Defendant/Respondent: MICHAEL KEHOE	Court Address: PO BOX 1870 301 E HIGH ST JEFFERSON CITY, MO 65101	(Date File Stamp for Return)
Nature of Suit: CC Temporary Restraining Order		

The State of Missouri to: **MICHAEL KEHOE**
Alias:

201 W. CAPITAL AVE., ROOM
216
JEFFERSON CITY, MO 65101

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

COURT SEAL OF



COLE COUNTY

04-SEP-2025

Date

/s/MarkEichholz/zf

Clerk

Further Information:

Officer's or Server's Return

Note to serving officer: Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

☒ (for service on a corporation) delivering a copy of the summons and petition to: Office of the Governor
Jordan Roling (name) Deputy General Counsel (title).

☐ other: _____

Served at 201 W. Capital Ave. Rm 216, Jefferson City (address)
in Cole (County/City of St. Louis), MO, on Sept. 4, 2025 (date)
at 11:22 A.M. (time).

Stephen R. Waters
Printed Name of Officer or Server

Stephen R. Waters
Signature of Officer or Server

Must be sworn before a notary public if not served by an authorized officer.

Subscribed and sworn to before me on September 4, 2025 (date).

(Seal)

My commission expires: 8/24/29

Date

Merle Thompson
Notary Public

Service Fees (if applicable)

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____



A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant
SERVICE EMAIL: louis.capozzi@ago.mo.gov

SERVICE PARTY: SHARON GEUEA JONES, Attorney for Plaintiff
SERVICE EMAIL: sharon@jonesadvocacy.com



Summons in Civil Case

IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI

Judge or Division: BRIAN K STUMPE	Case Number: 25AC-CC06724	
Plaintiff/Petitioner: NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE	Plaintiff's/Petitioner's Attorney/Address NIMROD THOMAS CHAPEL 311 W. DUNKLIN ST. JEFFERSON CITY, MO 65101	
Defendant/Respondent: MICHAEL KEHOE	Court Address: PO BOX 1870 301 E HIGH ST JEFFERSON CITY, MO 65101	(Date File Stamp for Return)
Nature of Suit: CC Temporary Restraining Order		

The State of Missouri to: **ANDREW BAILEY**
Alias:

227 EAST HIGH ST.
JEFFERSON CITY, MO 65101

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

COURT SEAL OF



COLE COUNTY

04-SEP-2025

Date

/s/MarkEichholz/zf

Clerk

Further Information:

Officer's or Server's Return

Note to serving officer: Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent,
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

☒ (for service on a Government Office) delivering a copy of the summons and petition to:
Winderlyn Woodard (name) Designated Employee (title).

☐ other: _____

Served at 227 E. High St., Jefferson City (address)
in Cole (County/City of St. Louis), MO, on Sept. 4, 2025 (date)
at 11:17 a.m. (time).

Stephen R. Waters Printed Name of Officer or Server
Stephen R. Waters Signature of Officer or Server

Must be sworn before a notary public if not served by an authorized officer.

(Seal) Subscribed and sworn to before me on September 4, 2025 (date).
My commission expires: 8/24/29 Date Merle Thompson Notary Public



Service Fees (if applicable)	
Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	_____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
 SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant
 SERVICE EMAIL: louis.capozzi@ago.mo.gov

SERVICE PARTY: SHARON GEUEA JONES, Attorney for Plaintiff
 SERVICE EMAIL: sharon@jonesadvocacy.com



Summons in Civil Case

IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI

Judge or Division: BRIAN K STUMPE	Case Number: 25AC-CC06724	
Plaintiff/Petitioner: NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE	Plaintiff's/Petitioner's Attorney/Address NIMROD THOMAS CHAPEL 311 W. DUNKLIN ST. JEFFERSON CITY, MO 65101	
Defendant/Respondent: MICHAEL KEHOE	Court Address: PO BOX 1870 301 E HIGH ST JEFFERSON CITY, MO 65101	(Date File Stamp for Return)
Nature of Suit: CC Temporary Restraining Order		

The State of Missouri to: CINDY O'LAUGHLIN
Alias:

201 W. CAPITOL AVE., ROOM
326
JEFFERSON CITY, MO 65101

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

COURT SEAL OF



COLE COUNTY

04-SEP-2025

Date

/s/MarkEichholz/zf

Clerk

Further Information:

①

Officer's or Server's Return

Note to serving officer: Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

☒ (for service on a corporation) delivering a copy of the summons and petition to: Cindy O'Laughlin, Office of President Pro-Tem, Mo. Senate

Lisa Garrison- (name) Legislative Assistant (title).

☐ other: Approved by Brice Beal, Legal Counsel,

Served at 201 W. Capital Ave. Rm 326, Jefferson City (address)
in Cole (County/City of St. Louis), MO, on Sept. 4, 2025 (date)
at 11:30 A.M. (time).

Stephen R. Waters
Printed Name of Officer or Server

[Signature]
Signature of Officer or Server

Must be sworn before a notary public if not served by an authorized officer.
Subscribed and sworn to before me on September 4, 2025 (date).

(Seal) My commission expires: 8/24/29 Merle Thompson
Date Notary Public

Service Fees (if applicable)

Summons \$ _____
Non Est \$ _____
Sheriff's Deputy Salary _____
Supplemental Surcharge \$ 10.00
Mileage \$ _____ (_____ miles @ \$ _____ per mile)
Total \$ _____

MERLE THOMPSON
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: August 24, 2029
Commission Number: 21957661

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
 SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant
 SERVICE EMAIL: louis.capozzi@ago.mo.gov

SERVICE PARTY: SHARON GEUEA JONES, Attorney for Plaintiff
 SERVICE EMAIL: sharon@jonesadvocacy.com

Electronically Filed - COLE CIRCUIT - September 11, 2025 - 09:10 AM

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Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant

SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant

SERVICE EMAIL: louis.capozzi@ago.mo.gov

SERVICE PARTY: SHARON GEUEA JONES, Attorney for Plaintiff

SERVICE EMAIL: sharon@jonesadvocacy.com

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

**NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF
COLORED PEOPLE
MISSOURI STATE CONFERENCE**

PATRICIA A. JONES

TRACI. L. WILSON KLEEKAMP

Plaintiff,

v.

Case No. 25AC-CC06724

STATE OF MISSOURI

**Serve: Office of the Attorney General
227 East High St.
Jefferson City, MO 65101**

**MICHAEL KEHOE in his official
capacity as Governor of Missouri**

**REQUEST FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

**ANDREW BAILEY in his official
capacity as Attorney General of Missouri**

**CINDY O’LAUGHLIN in her official
capacity as State Senator and President
Pro Tem of the Senate**

**JON PATTERSON, in his official
capacity as State Representative and
Speaker of the House**

Defendants

**FIRST AMENDED PETITION FOR DECLARATORY JUDGMENT
AND INJUNCTIVE RELIEF**

Comes now Plaintiffs the National Association for the Advancement of Colored People Missouri State Conference (“NAACP MO”), Patricia A. Jones (“Jones”), and Traci Wilson-

Kleekamp (“Wilson-Kleekamp”) by and through undersigned counsel and for their Petition against Defendants State of Missouri (“State”), Governor Mike Kehoe (“Governor”), Attorney General Andrew Bailey (“Attorney General”), Senator and President Pro Tem of the Senate Cindy O’Laughlin (“Pro Tem”), and Representative and Speaker of the House Jon Patterson (“Speaker”), states as follows:

I. INTRODUCTION

Plaintiffs bring this Verified Petition for Declaratory Judgment and Injunctive Relief, challenging the constitutionality of the Proclamation issued by the Governor on August 29, 2025, (“Proclamation”) (Attached as Exhibit A) calling the legislature into an extraordinary session. The Proclamation purportedly was issued under the authority of Article IV, Section 9 of the Missouri Constitution and contains two general topic areas of consideration for the General Assembly – a new Congressional Map drafted under Article III, Section 45 and new laws relating to initiative petitions. The Governor also issued a Press Release (Attached as Exhibit B) to explain his Proclamation which included a proposed new Congressional Map (Attached as Exhibit C) and included reasoning for the extraordinary session different than that stated in the Proclamation. The General Assembly has adjourned from the extraordinary session after passing two pieces of legislation. This amended petition is for the purposes of requesting appropriate relief following this action.

This appears to be a case of first impression in Missouri. Article IV, Section 9 of the Missouri Constitution grants the Governor authority to convene the legislature "on extraordinary occasions." Although the question of what an “extraordinary occasion” under the Missouri Constitution has not been tested in the Courts, no governor has ever before convened the legislature based on similar facts.

Neither of the matters designated in the Proclamation reach the level of extraordinary occasion required by Article IV, Section 9. Additionally, neither Article IV, Sec. 9 nor Article III, Section 45 expressly grant the Governor the authority to request a new Congressional Map from the General Assembly without action from Congress.

Allowing an extraordinary session of the legislature when the constitutionality of the Proclamation is in doubt creates irreparable harm in that the additional costs attributable to the legislative session is in excess of \$25,000 per day based on the per diem and mileage payments authorized by Sections 21.140 and 21.145. Additional irreparable harms would be created by the undue burden on interested parties to travel to Jefferson City for the public hearings and to participate in the legislative process outside of the usual timeframe, uncertainty in the district boundaries both for constituents and anyone interested in filing for office, and the undue burden on legislators created by an early return to Jefferson City.

Plaintiffs seek a declaratory judgment that the Governor's Proclamation is unconstitutional and a temporary restraining order and preliminary and permanent injunctions against the convening of the legislature for an extraordinary session based upon said Proclamation.

II. PARTIES

1. Plaintiff National Association for the Advancement of Colored People Missouri State Conference ("NAACP MO") is an affiliate of the National Association for the Advancement of Colored People, a Delaware nonprofit corporation in good standing that conducts business in Missouri through its Missouri State Conference. The National Association for the Advancement of Colored People is the oldest and largest civil rights organization in the nation.

2. NAACP MO has members in over 35 of its Units across Missouri. The mission of the NAACP is to achieve equity, political rights, and social inclusion by advancing policies and

practices that expand human and civil rights, eliminate discrimination, and accelerate the well-being, education, and economic security of Black people and all persons of color.

3. Plaintiff Patricia A. Jones is a natural person, a resident and citizen of Jackson County, Missouri, and these United States.

4. Plaintiff Traci L. Wilson Kleekamp is a natural person, a resident and citizen of Boone County, Missouri, and these United States.

5. Defendant State of Missouri enforces the Statutes and Constitution of Missouri and will be responsible for the implementation of legislation passed during the extraordinary session.

6. The Honorable Michael Kehoe is a natural person, the duly elected and currently serving Governor of Missouri, sued in his official capacity as a constitutional officer of the State of Missouri, whose official office is in Cole County.

7. The Honorable Andrew Bailey is a natural person, the duly elected and currently serving Attorney General of Missouri, sued in his official capacity as a constitutional officer of the State of Missouri, whose official office is in Cole County.

8. The Honorable Cindy O'Laughlin is a natural person, the duly elected and currently serving President Pro Tem of the Missouri Senate, sued in her official capacity as a constitutional officer of the State of Missouri, whose official office is in Cole County.

9. The Honorable Jon Patterson is a natural person, the duly elected and currently serving Speaker of the Missouri House, sued in his official capacity as a constitutional officer of the State of Missouri, whose official office is in Cole County.

III. JURISDICTION AND VENUE

10. The Court has jurisdiction over this action pursuant to Article V, Section 14 of the Missouri Constitution and Section 527.010, RSMo.

11. Venue is proper in this Court pursuant to Section 508.010.2(1), RSMo, because Defendants officers of the State of Missouri sued in their official capacities whose offices are located in Cole County, Missouri.

IV. FACTS COMMON TO ALL COUNTS

12. In April 2021, the US Census Bureau published the results of the decennial census and its reapportionment calculations, starting the process of reapportionment and redistricting in all 50 States.

13. Missouri's Congressional Redistricting is governed by Article III, Section 45 of the Missouri Constitution and requires the General Assembly to pass a law dividing the state into districts composed of contiguous territory as compact and as nearly equal in population as may be.

14. On March 1, 2022, then Representative Dan Shaul introduced redistricting legislation, House Bill 2909 entitled "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." (Truly Agreed and Finally Passed Version Attached as Exhibit D).

15. On May 9, 2022, House Bill 2909 was passed by the Missouri House by a vote of 101 Ayes to 47 Noes. The Emergency Clause was adopted by a vote of 114 Ayes to 34 Noes.

16. On May 11, 2022, House Bill 2909 was Truly Agreed and Finally Passed by the Senate by a vote of 22 Ayes to 11 Noes. The Emergency Clause was adopted by a vote of 29 Ayes to 4 Noes.

17. On May 18, 2022, House Bill 2909 was delivered to the Governor and was signed into law by the Governor on the same day.

18. House Bill 2909 went into effect on May 18, 2022, and applied to the 118th Congress election which was to be held in November 2022.

19. On November 8, 2022, an election for US Representatives was held with the district boundaries being those described in House Bill 2909.

20. On November 5, 2024, an election for US Representatives was held with the district boundaries being those described in House Bill 2909. This was the second election using that district maps approved by the legislature and signed into law by the Governor.

21. On August 29, 2025, the Governor issued a Press Release announcing a Proclamation convening an extraordinary session of the legislature under Article IV, Section 9 for the purpose of enacting legislation establishing revised congressional districts and amending the state's initiative petition process.

22. The Press Release contained several reasons for the Proclamation including "to ensure our districts and Constitution truly put Missouri values first."

23. The Press Release also contained a proposed "Missouri First Map" outlining a new set of Congressional Districts.

24. The "Missouri First Map" is substantially different than the districts passed into law by House Bill 2909.

25. The Proclamation convening the legislature into an extraordinary session lays out eleven "whereas" statements justifying the reasoning for the Proclamation.

"WHEREAS, the General Assembly has adjourned its regular legislative session without having enacted new congressional district boundaries; and

WHEREAS, Article III, Section 45 of the Missouri Constitution authorizes the General Assembly to divide the state into districts for the United States House of Representatives; and

WHEREAS, the State of Missouri's current congressional district map may be vulnerable to a legal challenge under the Voting Rights Act and the Fourteenth Amendment, due to a lack of compactness in certain districts; and

WHEREAS, our congressional delegation should reflect the values of Missourians; and

WHEREAS, congressional candidate filing for the 2026 election cycle begins on February 24, 2026; and

WHEREAS, legislation to establish new congressional districts for the State of Missouri cannot be accomplished in the 2026 Regular Session; and

WHEREAS, the failure to establish new congressional districts constitutes an extraordinary occasion that warrants immediate legislative action; and

WHEREAS, the swift and efficient resolution of this matter is necessary to prepare for the upcoming election cycle and to provide certainty for voters; and

WHEREAS, a fair and transparent initiative petition process is essential for the citizens of the State of Missouri to propose and enact laws; and

WHEREAS, the current initiative petition process may be vulnerable to foreign and out-of-state influence; and

WHEREAS, certain ballot initiatives can be confusing to voters and lead to unintended consequences; and”

(Exhibit A, P. 1)

26. The “whereas” statements generally include the adjournment of the General Assembly without passage of new congressional district boundaries (although no new congressional maps are required until after the 2030 census) and the speculation that the current congressional district map may be vulnerable to a legal challenge from unnamed persons for unexplained reasons.

27. Other “whereas” statements generally relate to the need for a “fair and transparent” initiative petition process free from unspecified influence from unnamed foreign sources.

28. Together these eleven statements provide the official justification that an extraordinary occasion exists.

29. The Proclamation then convenes the legislature beginning at Noon on Wednesday, September 3, 2025, for two purposes:

1. To enact legislation to establish new congressional districts for the State of Missouri.
2. To enact legislation to amend the state's initiative petition process as follows:
 - a. To ban foreign nationals from contributing to committees for or against a statewide ballot measure; and
 - b. To establish a criminal election offense for fraudulently signing or gathering signatures for a statewide ballot measure; and
 - c. To provide that a statewide ballot measure be passed only if a majority of voters statewide and a majority of voters in each congressional district vote to adopt the proposed measure; and

d. To require that before a statewide ballot measure is certified for signatures to be gathered, there shall be an opportunity for public comment; and

e. To require that the full text of a statewide ballot measure be printed and available to voters at all election sites and polling places.

(Exhibit A P. 2)

30. The US Census Bureau has not issued new apportionment calculations since the April 2021 publication.

31. On information and belief, the Governor has not received certified numbers from the House of the Congress of the United State triggering the processes of Article III, Section 45 after May 18, 2022, when the current district boundaries when into effect with House Bill 2909.

32. On information and belief, only two challenges to the district boundaries passed in House Bill 2909 have been filed, and neither was pursued to conclusion by the plaintiffs. See *Berry v. Ashcroft*, U.S. District Court for the Eastern District of Missouri, St. Louis Division - No. 4:22-cv-465; *Thomas v. Missouri*, Missouri Circuit Court, Cole County - No. 22AC-CC00222.

33. On December 1, 2024, then Senator Ben Brown introduced Senate Bill 152 entitled “AN ACT To amend chapter 130, RSMo, by adding thereto six new sections relating to campaign finance.” (Truly Agreed and Finally Passed Version Attached as Exhibit E).

34. On March 27, 2025, Senate Bill 152 was passed by the Missouri Senate by a vote of 28 Ayes to 2 Noes.

35. On May 15, 2025, Senate Bill 152 was Truly Agreed and Finally Passed by the House by a vote of 94 Ayes to 47 Noes.

36. On July 9, 2025, Senate Bill 152 was signed into law by the Governor.

37. Senate Bill 152 went into effect on August 28, 2025.
38. Senate Bill 152 contained several provisions which restricted donations from foreign nationals and the use of foreign funds for the purposes of ballot measures.
39. Missouri statutes make it a crime to fraudulently gather signatures for an initiative petition under Section 116.090 RSMo. This section was amended in 2013.
40. Missouri provides an opportunity for public comment on every initiative petition filed with the Secretary of State under Section 116.153 and 116.334 RSMo. These sections were amended in 2014 and 2025 respectively.
41. Missouri requires copies of the full text of each statewide ballot measure to be made available at each polling place under Section 116.290 RSMo. This section was amended in 1983.
42. All but one of the actions deemed necessary by the Governor in the Proclamation appear to have already occurred.
43. The only matter designated by the proclamation which has not already been enacted is in part 2 subsection c of the proclamation and is “To provide that a statewide ballot measure be passed only if a majority of voters statewide and a majority of voters in each congressional district vote to adopt the proposed measure...”
44. There has been ample time for potential challenges to the district boundaries established by House Bill 2909 and none has been forthcoming.
45. The General Assembly has convened and adjourned pursuant to the Proclamation and passed two pieces of legislation, House Bill 1 and House Joint Resolution 3.

V. CAUSES OF ACTION

COUNT I – DECLARATORY JUDGEMENT
THE GOVERNOR’S PROCLAMATION FAILS TO STATE AN EXTRAORDINARY
OCCASSION AS REQUIRED BY ARTICLE IV SECTION 9.

46. Plaintiff incorporates by reference all proceeding paragraphs of this Petition as if fully set forth herein.

47. Plaintiff is requesting a declaratory judgment under Sections 527.010 and 527.020 RSMo.

48. Article IV, Section 9 of the Missouri Constitution provides:
The governor shall, at the commencement of each session of the general assembly, at the close of his term of office, and at such other times as he may deem necessary, give to the general assembly information as to the state of the government, and shall recommend to its consideration such measures as he shall deem necessary and expedient. *On extraordinary occasions he may convene the general assembly by proclamation, wherein he shall state specifically each matter on which action is deemed necessary.* (Emphasis added).

49. Since 1944, there have been at least 33 extraordinary sessions convened by the Governor.

50. The matters designated by the Governor for these extraordinary sessions range from emergency appropriations to motor vehicle sales tax.

51. Article, IV, Section 9 requires an “extraordinary occasion” before the Governor can convene the legislature.

52. The definition of and parameters around the term “extraordinary occasion” is a question of first impression for this Court.

53. Where there is no specific definition of a legislative or Constitutional term, the ordinary meaning canon of legislative interpretation applies.

54. The term “extraordinary” in common usage means:

a. Out of the ordinary; exceeding the usual, average, or normal measure or degree; beyond or out of the common order, method or rule; not usual, regular, or of a customary kind; remarkable; uncommon; rare; employed for an exceptional purpose or on a special occasion. (Black's Law Dictionary Sixth Edition)

b. Beyond what is common or usual: remarkable. (Webster's II Revised Edition)

55. The term "occasion" in common usage means:

a. That which provides an opportunity for the causal agency to act. Meaning not only particular time but carrying idea of opportunity, necessity or need, or even cause in a limited sense. Condition of affairs; juncture entailing need; exigency; or juncture affording ground or reason for something. (Black's Law Dictionary Sixth Edition)

b. An event, especially a notable event. The time at which something occurs. A favorable moment: opportunity. Something that brings on an event. A need created by particular circumstances. (Webster's II Revised Edition)

56. Taken together the phrase "extraordinary occasion" would appear to mean a set of circumstances that require action or bring about an event.

57. Nothing in the Governor's Proclamation indicates a change in Missouri's circumstances that requires action.

58. In fact, all but one of the matters designated by the Proclamation are already law and have already been acted upon by the General Assembly. Thus, the Proclamation fails because, none of the actions are "necessary" as required by Article, IV, Section 9. Nothing sought in the Proclamation is required for the next election for US Representatives to take place in 2026.

59. The Governor references the potential for litigation over the constitutionality of the congressional boundaries but provides no support for this claim. Furthermore, the mere threat of litigation would not require redrawing district maps. Such action would be “necessary” only if a litigant actually initiated a lawsuit, prevailed against the State, and Missouri was ordered by a court to redraw district lines. None of that has transpired. There also is no allegation by anyone that the maps as they exist violate the one-person one-vote principal. Thus, there is no legitimate threat to the constitutionality of the current maps.

60. A review of the history of extraordinary sessions after the 1971 move to annual legislative sessions will likely show a trend away from the original purpose of emergency spending and interim changes to Federal requirements.

61. The Governor in recent years has begun calling extraordinary sessions on a regular basis to designate matters the legislature addressed but failed to pass during their regular session. That is not the case here. The last time the legislature addressed drawing district lines was when it was required to do so after the results of the 2020 Census.

62. Broad discretion given to the Governor under the doctrine of separation of powers does not need to be limitless.

63. The separation of powers doctrine does not, for example, require the Courts to allow the executive to act without legislative authority or in violation of the Constitution.

64. In this instance, the Court should require a minimum showing of some set of circumstances or events outside of the normal course of business to justify the convening of the legislature in an extraordinary session under Art. IV Sec. 9.

WHEREFORE, Plaintiffs respectfully request the Court:

- A. Enter judgment declaring the Governor's Proclamation to be insufficient under Article IV, Section 9;
- B. Grant preliminary and permanent injunctions prohibiting Defendants from implementing any legislation or joint resolutions passed pursuant to the Proclamation;
- C. Declare any legislation passed pursuant to the Proclamation to be invalid
- D. An award of costs under Section 527.100; and
- E. Such other relief as is just and proper.

**COUNT II – REQUEST FOR PRELIMINARY INJUNCTION
THE PROCLAMATION ISSUED BY THE GOVERNOR ON AUGUST 29, 2025 IS
INSUFFICIENT AND THE GENERAL ASSEMBLY MAY
NOT CONVENE PURSUANT TO ITS PROVISIONS.**

65. Plaintiff incorporates by reference all proceeding paragraphs of this Petition as if fully set forth herein.

66. Plaintiff is requesting a preliminary injunction pursuant to section 526.030 RSMo.

67. Injunctions may be granted by the Court under Section 526.030 RSMo in cases where other remedies would not be adequate.

68. A temporary injunction may be granted when it appears the plaintiff is entitled to relief, there is a likelihood of action during pending litigation, and irreparable harm would result, Section 526.050 RSMo.

69. There is no reason to believe that Plaintiffs will not succeed in their claims after full briefing and argument.

70. The Plaintiffs in this case has clearly laid out a series of questions of first impression properly before the Court.

71. There is a certainty of action being taken during the pendency of this case absent an injunction.

72. The legislature has already passed legislation in accordance with the Governor's Proclamation.

73. Irreparable harm in the form of confusion over congressional boundaries and whether a measure relating to initiative petitions will appear on the ballot, costs to the taxpayers, and undue burden to participants in the process will result absent an injunction.

74. Non-monetary harms such as the undue burden on interested parties in the filing of legal challenges to the language of House Bill 3 which must be filed within 10 days of certification of the title, and uncertainty in the district boundaries both for constituents and anyone interested in filing for office.

75. The non-monetary harms caused by the legislature's convening cannot be remedied by monetary damages.

76. It is in the public interest to delay the implementation of any legislation until the underlying issue of Constitutionality has been resolved.

77. Absent injunctive relief, Plaintiffs, as taxpayers, will suffer immediate and irreparable harm in the form of additional costs and confusion.

WHEREFORE, Plaintiffs respectfully request the Court:

- A. Issue a preliminary injunction prohibiting Defendants from implementing any legislation or joint resolutions passed pursuant to the Proclamation;
- C. An award of costs under Section 527.100; and
- D. Such other relief as is just and proper.

Respectfully Submitted,



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IN THE CIRCUIT COURT OF COLE COUNTY STATE
OF MISSOURI

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
MISSOURI STATE CONFERENCE)

PATRICIA A. JONES)

TRACI. L. WILSON KLEEKAMP)

Plaintiff,)

v.)

Case No. 25AC-CC06724

STATE OF MISSOURI)

Serve: Office of the Attorney General)
227 East High St.)
Jefferson City, MO 65101)

MICHAEL KEHOE in his official)
capacity as Governor of Missouri)

REQUEST FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION

ANDREW BAILEY in his official)
capacity as Attorney General of Missouri)

CINDY O'LAUGHLIN in her official)
capacity as State Senator and President)
Pro Tem of the Senate)

JON PATTERSON, in his official)
capacity as State Representative and)
Speaker of the House)

Defendants)

PLAINTIFF'S REQUEST FOR SUMMONSES

COMES NOW Plaintiffs hereby request that a summons be issued to:

STATE OF MISSOURI
Serve: Office of the Attorney General
227 East High St.
Jefferson City, MO 65101

Respectfully submitted,

/s/Nimrod T. Chapel, Jr.

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CERTIFICATE OF SERVICE

I hereby affirm filing a true and accurate copy of the foregoing with the Court's Electronic Filing System, on this 15th day of September 2025, serving all counsel of record.

/s/Nimrod T. Chapel, Jr.

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

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IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

MO STATE CONFERENCE FOR THE)
NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF COLORED)
PEOPLE, et al.,)

Case No. 25AC-CC06724

Plaintiffs,

v.)
MICHAEL KEHOE, et al.,)

Defendants.

DEFENDANTS' OBJECTIONS TO MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION, AND MOTION
TO DISMISS

TABLE OF CONTENTS

INTRODUCTION	3
LEGAL STANDARD	6
ARGUMENT	7
I. Plaintiffs' Count I and Count III claims to incapacitate the legislature cannot succeed.	7
A. Plaintiffs' Count I and Count III claims to enjoin the legislature are moot because the General Assembly has adjourned.	7
B. Plaintiffs do not have standing.	8
C. Plaintiffs' challenge is nonjusticiable because it violates Missouri's political question doctrine.	11
D. The Governor of Missouri has unreviewable discretion to call for a special session under art. IV, § 9.	15
II. Plaintiffs' challenge to the General Assembly's mid-decade redistricting prerogative fails on the merits.	24
III. Plaintiffs identify no irreparable harm.	27
CONCLUSION	30

INTRODUCTION

Article II, § 1 of the Missouri Constitution “provides for separation of powers among the legislative, executive, and judicial departments.” *Giudicy v. Mercy Hospitals East Communities*, 645 S.W.3d 492, 498 (Mo. banc 2022). Under this State’s republican system of government, the Governor wields discretionary authority to call special sessions of the General Assembly. Mo. Const. art. IV, § 9. And, the General Assembly, in turn, has the power to “divide the state” into congressional districts. Mo. Const. art. III, § 46.

Plaintiffs seek to scramble that basic design, and to destabilize the “separation of power[s] and limitation of authority . . . vital to the maintenance of our system.” *Lake Wauwanoka, Inc. v. Spain*, 622 S.W.309, 311 n.5 (Mo. App. E.D. 1981). In Counts I and III, they ask for the Court to second-guess the Governor’s decision to convene the General Assembly for a special session. *See* Pls. Pet. at 17 (“Plaintiffs respectfully request the Court . . . [i]use a preliminary injunction prohibiting Defendants Pro Tem and Speaker from calling the legislature into session based on the Proclamation.”).

But Plaintiffs’ challenge to the special session fails for several, independent reasons. *First* and foremost, Plaintiffs’ claim is moot. The General Assembly has already adjourned sine die, *see* Missouri Senate, *Major Dates for the 2025 Session*, (Sept. 12, 2025), <https://senate.mo.gov/Legislation/MajorDates>; Missouri House of Representatives, *Chamber Messageboard* (Sept. 12, 2025), <https://house.mo.gov/>, and the Court can no longer grant the relief requested in Counts I and III of Plaintiffs’ petition. *Second*, they fail to establish taxpayer standing because they are not

challenging any direct expenditure flowing from allegedly unconstitutional action—but instead bring an unprecedented challenge to the General Assembly’s general operating expenditures. *Third*, Plaintiffs’ request to enjoin the General Assembly from meeting is barred by Missouri’s political question doctrine. *Finally*, Plaintiffs’ challenge fails on the merits. The Governor has broad discretion to call a special session, and precedent confirms that courts cannot second-guess the manner in which the Governor uses that discretion. *State ex rel. Rice v. Edwards*, 241 S.W. 945, 948 (Mo. banc 1922) (“The matter to be legislated upon at a special session is within the discretion of the Governor.”).

Additionally, Plaintiffs ask the Court to hold that the General Assembly lacks the power to conduct a mid-decade redistricting. But this challenge is doomed on the merits. Nothing prohibits the General Assembly from adopting a new federal congressional map mid-decade. The Missouri Constitution is simply silent on that question. And where the Missouri Constitution is silent on a challenged legislative power, the General Assembly has the discretion to act. *See State v. Clay*, 481 S.W.3d 531, 537 (Mo. banc 2016) (“[T]he General Assembly has the power to do whatever is necessary to perform its functions *except as expressly restrained by the Constitution*.”). “The general assembly’s authority is plenary, except when express constitutional provisions intervene,” *Blaske v. Smith & Entzeroth, Inc.*, 821 S.W.2d 822, 835 (Mo. banc 1991), and here no such provisions “intervene.” Consequently, the Court should deny Plaintiffs’ request for preliminary injunctive relief because they cannot succeed on the merits.

Finally, for all their claims, Plaintiffs fail to demonstrate irreparable harm justifying immediate injunctive relief. Plaintiffs will have a full opportunity to contest the General Assembly's proposed federal congressional map. The new federal congressional map will not be used until 2026. Consequently, this Court can adjudicate redistricting claims with expedited merits proceedings—not based on rush requests for emergency relief.

For all these reasons, this Court should *deny* Plaintiffs' motion (Pls. Mot. for TRO) in its entirety and dismiss this case.

LEGAL STANDARD

“When considering a motion for a preliminary injunction, a court should weigh ‘the movant’s probability of success on the merits, the threat of irreparable harm to the movant absent the injunction, the balance between this harm and the injury that the injunction’s issuance would inflict on other interested parties, and the public interest.’” *State ex rel. Dir. of Revenue, State of Mo. v. Gabbert*, 925 S.W.2d 838, 839 (Mo. banc 1996) (quoting *Pottgen v. Mo. State High Sch. Activities Assoc.*, 30 F.3d 926, 928 (9th Cir. 1994)). “To show entitlement to injunctive relief, a petition must plead facts that show (1) the plaintiff has no adequate remedy at law, and (2) irreparable harm will result if the relief is not granted.” *Glenn v. City of Grant City*, 69 S.W.3d 126, 130 (Mo. App. W.D. 2002) (citing *Walker v. Hanke*, 992 S.W.2d 925, 933 (Mo. App. W.D. 1999)). Plaintiffs cannot obtain the “extraordinary” remedy of a preliminary injunction without a “clear showing” of entitlement to relief. *Mazurek v. Armstrong*, 520 U.S. 968, 972 (1997) (emphasis in original) (quoting 11 Wright & Miller, *Federal Practice and Procedure* § 2948, pp. 129–130 (2d ed. 1995)).

When challenging a statute, it is “presumed constitutional and will be found unconstitutional only if ‘it clearly and unambiguously contravenes a constitutional provision.’” *State v. Shanklin*, 534 S.W.3d 240, 241–42 (Mo. banc 2017) (quoting *Lopez-Matias v. State*, 504 S.W.3d 716, 718 (Mo. banc 2016)).

ARGUMENT

I. Plaintiffs’ Count I and Count III claims to incapacitate the legislature cannot succeed.

Plaintiffs cannot show that their challenge to the calling of the special session—made in Counts I and III—have any “likelihood of success on the merits.” *Impey v. Clithero*, 553 S.W.3d 344, 354 (Mo. App. W.D. 2018). Plaintiffs’ invitation to second-guess the convening of the legislature is doomed—it is not justiciable and fails on the merits. The Governor possesses unreviewable discretion to call a special session under article IV, § 9.

A. Plaintiffs’ Count I and Count III claims to enjoin the legislature are moot because the General Assembly has adjourned.

Plaintiffs’ demand for injunctive relief against the General Assembly is moot. The Plaintiffs sought injunctive relief against the “calling the legislature into session.” Pls. Pet. at 17. Because the General Assembly has adjourned *sine die*, any supposed injury Plaintiffs suffered can no longer be remedied by the only judicial relief Plaintiffs have requested. *See id.* And in Missouri, “[a] case becomes moot when the issue presented seeks a decision by a court ‘upon some matter which, if the judgment was rendered, would not have any practical effect upon any then existing controversy.’” *Lamar Co., LLC v. City of Kansas City*, 330 S.W.3d 767, 771 (Mo. App. W.D. 2010) (quoting *Precision Invs., L.L.C. v. Cornerstone Propane, L.P.*, 220 S.W.3d 301, 304 (Mo. banc 2007)).

B. Plaintiffs lack standing to challenge the special session.

Plaintiffs do not have standing to challenge the calling of a special legislative session. “Regardless of an action’s merits, unless the parties to the action have proper standing, a court may not entertain the action.” *Lee’s Summit License, LLC v. Office of Administration*, 486 S.W.3d 409, 416 (Mo. App. W.D. 2016) (quoting *E. Mo. Laborers Dist. Council v. St. Louis Cnty.*, 781 S.W.2d 43, 45–46 (Mo. banc 1989)). Standing includes three irreducible elements: that a plaintiff (1) suffered an injury to a cognizable interest (2) caused by the defendant that (3) a court order would redress. And, Plaintiffs bear the burden of establishing the existence of these conditions. See *Manzara v. State*, 343 S.W.3d 656, 659 (Mo. banc 2011).

They fail that burden. *First*, Plaintiffs cannot establish taxpayer standing, and, *second*, their alleged “[a]dditional irreparable harms,” Pls. Mot. for TRO at 12, fall far short of meeting the injury, causation, and redressability requirements.

1. Plaintiffs lack taxpayer standing.

Plaintiffs do not have standing as taxpayers to challenge the special session of the General Assembly. To establish taxpayer standing, “the plaintiff must establish that one of three conditions exists: ‘(1) a direct expenditure of funds generated through taxation; (2) an increased levy in taxes; or (3) a pecuniary loss attributable to the challenged transaction of a municipality.’” *State ex rel. Mo. Automobile Dealers Ass’n v. Mo. Dept. of Revenue & Its Dir.*, 541 S.W.3d 585, 592 (Mo. App. W.D. 2017) (quoting *Manzara*, 343 S.W.3d at 659)). Here, Plaintiffs can rely only on the first condition—“a direct expenditure of funds. . . .” See Pls. Mot. for TRO at 3 (“additional costs attributable to the legislative session is in excess of \$25,000. . .”). And,

Plaintiffs' foundation for this condition is extremely narrow—and ultimately doomed: Plaintiffs rest their argument on legislators' compensation as their one and only hook for standing. *See* Pls. Pet. at ¶ 83 (“Costs of an extraordinary session are expected to exceed \$25,000 per day based upon the per diem and mileage allowances given to the members of the General Assembly.”).

Unfortunately for Plaintiffs, “[a] series of cases holds that ‘general operating expenses which [an agency] incurs regardless’ of the allegedly illegal activity are not ‘direct’ expenditures, and are insufficient to establish taxpayer standing.” *City of Slater v. State*, 494 S.W.3d 580, 587 (Mo. App. W.D. 2016), *abrogated on other grounds*, *Goodman v. Saline Cnty. Comm.*, 2024 WL 1392392 (Mo. App. W.D. Apr. 2, 2024) (quoting *John T. Finley, Inc. v. Mo. Health Facils. Review. Comm.*, 904 S.W.2d 1, 3 (Mo. App. W.D. 1995)). In *City of Slater*, the Western District Court of Appeals explained that “‘salaries for staff time of [agency] employees, correspondence and telephone calls’ used to engage in the allegedly unlawful activity are ‘not the type of expenditure of public funds which would give standing, as they are general operating expenses which were incurred whether or not the challenged transaction took place.’” *Id.* (quoting *Ours v. City of Rolla*, 965 S.W.2d 343, 346 (Mo. App. S.D. 1998)).

Therefore, Missouri case law forecloses Plaintiffs' claims of taxpayer standing because expenditures for legislators conducting their standard business, such as *per diem* payments, the “general operating expenses” of the General Assembly, *id.*, are not “direct expenditures.” *State ex rel. Mo. Automobile Dealers Ass’n*, 541 S.W.3d at 592. Furthermore, permitting taxpayer standing in this circumstance would impose

grave public policy consequences moving forward. By Plaintiffs' logic, any time a prospective litigant sought to derail *any* legislative session for *any reason*, that litigant would have standing. That is not the law.

2. Plaintiffs do not allege other injuries sufficient for standing.

Plaintiffs' additional claims of irreparable harm are "speculative" and "hypothetical." *Campbell v. Adecco USA, Inc.*, 561 S.W.3d 116, 123 (Mo. App. W.D. 2018) (quoting *Braitberg v. Charter Communications, Inc.*, 836 F.3d 925, 930 (8th Cir. 2016)). And, a "speculative or hypothetical risk is insufficient" to allege a concrete injury" for standing. *Id.* Here, Plaintiffs cite vague hypotheticals such as the travel of "interested parties" to Jefferson City to "participate in the legislative process," "uncertainty in the district boundaries" (despite the creation of a *map*), and "undue burden" on legislators. Pls. Mot. for TRO at 12. These unsubstantiated injuries cannot establish standing.

First, alleged, "undue burden" to legislators, even if it existed, is *not* an injury to Plaintiffs; it implicates third parties *and Defendants*. *Second*, "uncertainty" and the speculative travel expenditures of parties seeking to lobby the government are exactly the type of theoretical, self-manufactured "injuries" that are impermissible for standing. And even if Plaintiffs could identify concrete travel or lobbying expenses, they "cannot manufacture standing merely by inflicting harm on themselves based on their fears of hypothetical future that is not certainly impending." *Murthy v. Missouri*, 603 U.S. 43, 73 (2024) (quoting *Clapper v. Amnesty*

International USA, 568 U.S. 398, 416 (2013)). Plaintiffs’ manufactured injuries are patently insufficient as an injury for standing.

C. Plaintiffs’ claim is nonjusticiable because it violates Missouri’s political question doctrine.

Plaintiffs’ suit, requesting the State’s judicial branch supervise decisions by the Governor and General Assembly over when the legislature can meet, is not justiciable under Missouri’s political question doctrine. Under any healthy separation of powers, “[t]he Governor is the exclusive judge of the facts requiring an extraordinary session of the Legislature.” *Newsom v. City of Rainier*, 185 P. 296, 298 (Or. 1919) (citing *Farrelly v. Cole*, 56 Pac. 492 (Kan. 1899)) (citations omitted) (interpreting the Oregon Constitution’s materially identical language to Mo. Const. art. IV, § 9).¹

In Missouri, “[t]he political question doctrine establishes a limitation on the authority of the judiciary to resolve issues, decidedly political in nature, that are properly left to the legislature. If a case actually involves the resolution of a political question, the matter is immune from judicial review.” *Bennett v. Mallinckrodt, Inc.*, 698 S.W.2d 854, 865–66 (Mo. App. E.D. 1985). Missouri courts have adopted the justiciability guidelines from the U.S. Supreme Court in *Baker v. Carr*, 369 U.S. 186 (1962). A court should dismiss as nonjusticiable a case if:

“[p]rominent on the surface of any case held to involve a political question [there] is found a textually demonstrable constitutional commitment of the issue to a coordinate political department; or a lack of judicially discoverable

¹ See Or. Const. art. V, § 12 (“He may on extraordinary occasions convene the Legislative Assembly by proclamation, and shall state to both houses when assembled, the purpose for which they shall have been convened.”).

and manageable standards for resolving it; or the impossibility of deciding without an initial policy determination of a kind clearly for nonjudicial discretion; or the impossibility of a court's undertaking independent resolution without expressing lack of the respect due coordinate branches of government; or an unusual need for unquestioning adherence to a political decision already made; or the potentiality of embarrassment from multifarious pronouncements by various departments on one question.”

Bennett, 698 S.W.3d at 864 (quoting *Baker v. Carr*, 396 U.S. at 217).

Here, Plaintiffs' suit is *exactly* the type of case which should be dismissed as nonjusticiable under *Bennett*. The Missouri Constitution expressly and unambiguously reserves the discretion to the Governor, or three-fourths of the members of each house . . . [to call] . . . the General Assembly into session. Mo. Const. art. III, § 20(b); art. IV, § 9; Art. III, § 39(7). To challenge this “nonjudicial” discretionary decision exceeds the scope of this Court's—or any court's—jurisdiction.

Bennett, 698 S.W.3d at 864.

Missouri has a long history of gubernatorial discretion to call special sessions.² In fact, this power *preexists* the contemporary Missouri Constitution of 1945,

² Over two decades from the early 1990s to the late 2010s, the Governor of Missouri called *thirteen* special sessions on a wide range of legislative matters: September 1993 (flood recovery funding); September 1994 (impeachment of the Secretary of State); May 1997 (completing work on the budget after a legislative impasse over abortion funding); September 1997 (economic development, including allocating with funds for historic buildings); September 2001 (prescription drug program for low-income seniors and meatpacking law revisions); June 2003 (revenue raising); September 2003 (raising taxes and revenues for education; nursing home legislation); September 2005 (abortion restrictions; drunk driving restrictions; workers' compensation; prescription drugs at schools; public information availability); August 2007 (economic development); June 2010 (tax incentives for automakers; state pension system); September 2011 (business incentives; natural disaster aid; delay presidential primary; give St. Louis control over its police; teacher-student social media prohibition); December 2013 (tax breaks for Boeing); May 2017 (electricity legislation). The Associated Press, *A historical look at Missouri special legislative*

stretching back to the accession of Missouri to the Union in 1820. For example, the Missouri Constitution of 1875 contained materially identical language. *See, e.g., City of St. Louis v. Withaus*, 16 Mo. App. 247, 249 (Mo. App. 1884) (“The state constitution provides (art. V., sect. 9), that the governor may convene the general assembly on extraordinary occasions by proclamation ‘wherein he shall state specifically each matter concerning which the action of that body is deemed necessary. . . .’”).

Despite that long history, Plaintiffs cite *zero* precedent suggesting the Missouri Constitution allows courts to second-guess the Governor’s use of the power to call special sessions. To the contrary, the Missouri Supreme Court has characterized the Governor’s power as *completely discretionary*: “The Governor, under the Constitution, can call a special session of the General Assembly. . . . *If he finds the occasion to exercise this prerogative*, he must ‘state specifically each matter concerning which the action of that body (General Assembly) is deemed necessary.’” *State ex rel. Rice*, 241 S.W. at 948 (Mo. banc 1922) (quoting Mo. Const. (1875) art. 5, § 9) (emphasis added). The phrase, “if he finds the occasion to exercise this prerogative,” both indicates that the Governor wields discretion to determine when and if he will call a special session. Plaintiffs’ illusory requirements constraining the Governor’s authority here simply do not exist.

State after State with similar or identical “extraordinary occasion” special session clauses has determined that legal challenges to this discretionary, executive

sessions, AP, (May 18, 2017), <https://apnews.com/a-historical-look-at-missouri-special-legislative-sessions-39c25ec9c8544673aa5a96f0c0e74a41>.

power are nonjusticiable.³ In interpreting whether the Kansas Governor held complete power to determine an “extraordinary occasion” under the Kansas Constitution, the Kansas Supreme Court ruled that it did not have jurisdiction to review political, discretionary decisions of the Governor and state legislature, such as calling the special session. *Farrelly v. Cole*, 56 P. 492, 497 (Kan. 1899) (contrasting such discretion with the “[m]inisterial acts” that “do not flow from the exercise of discretion” and which are reviewable”). In Washington, another State whose constitution features identical “extraordinary occasion” language, its supreme court stated that it is the “exclusive province of the governor, under the Constitution, to determine whether an occasion existed of sufficient gravity to require an extra session of the Legislature, and *his conclusion in that regard is not subject to review by the courts.*” *State v. Fair*, 76 P. 731, 732 (Wash. 1904) (emphasis added). South Carolina has too. *See McConnell v. Haley*, 711 S.E.2d 886, 887 (S.C. 2011) (citing *Farrelly*, 56 P. 462) (averring that, as in Missouri, “there is no indication in the Constitution as to what constitutes an ‘extraordinary occasion’ to justify an extra session of the General Assembly, this matter must be left to the discretion of the Governor and this Court may not review that decision”).

³ See, e.g., *State ex rel. Andrews v. Quam*, 7 N.W.2d 738, 738–9 (N.D. 1943) (holding that the question of what merits an “extraordinary occasion . . . is to be determined by the governor alone and is not subject to challenge or review by the courts”); *Herzberger v. Kelly*, 7 N.E.2d 865 (Ill. 1937). The *Herzberger* court reviewed the “extraordinary occasion” special session provision of the 1870–1970 Illinois Constitution, and held that “no authority to review the exercise of the discretionary power vested in the Governor by the Constitution was, by that instrument, seated in the judiciary. The only remedy provided for a violation by an executive of his constituted authority is by impeachment.” *Id.* at 866–67.

In the same refrain, the Supreme Court of Georgia commanded that “[t]he Governor is thus invested with extraordinary powers, and in the exercise of such powers and prerogatives neither the legislative nor the judicial department of the government *has any power to call him to account*, nor can they or either of them *review* his action in connection therewith.” *Bunger v. State*, 92 S.E. 72, 73 (Ga. 1917). More recently, Idaho reiterated, “[t]he determination as to whether facts exist as to constitute ‘an extraordinary occasion’ is for him [the governor] alone to determine. The responsibility and the discretion are his, not to be interfered with by any other co-ordinate branch of the government.” *Idaho State AFL-CIO v. Leroy*, 718 P.2d 1129, 1133 (Idaho 1986) (quoting *Diefendorf v. Gallet*, 10 P.2d 307, 314–315 (Idaho 1932)).

The weight of authority against Plaintiffs’ claim is overwhelming. States across the Union have held that judicial challenges to gubernatorial discretion to determine “extraordinary occasion[s]” are nonjusticiable political questions. Therefore, this Court should dismiss Plaintiffs’ suit.

D. The Governor of Missouri has unreviewable discretion to call for a special session under art. IV, § 9.

Even if the Court somehow deems Plaintiffs’ challenge to the special session justiciable, Plaintiffs’ claims in Counts I and III fail on the merits.

1. The Governor’s authority is well-established under Missouri law.

Since the State’s accession to the Union in 1820, the Governor has wielded authority to call special sessions. This includes matters relating to the representation

of Missouri voters. For example, in *State ex rel. Rice v. Edwards*, 241 S.W. 945 (Mo. banc 1922), the Governor called a special session to “permit the division of cities of six hundred thousand or over into districts for justices of the peace, by such officers as your body may specify.” *Rice*, 241 S.W. at 946. Time and time again, when Missouri courts have considered article IV, § 9 of the Missouri Constitution, or its analogues in prior constitutions harkening back to 1820, they focus upon interpreting the *message* of the Governor to the General Assembly. *See e.g., Lauck v. Reis*, 274 S.W. 827, 831 (Mo. 1925) (“[T]his much having been said regarding the purpose and effect of the special message of the Governor, let us proceed to analyze the particular paragraph of that message above. . .”). The Missouri Supreme Court has *never* second-guessed the Governor’s prerogative to call special sessions.

2. Unilateral, discretionary executive convening authority is well-established under the U.S. constitution.

Article IV, § 9 of the Missouri Constitution consciously follows the U.S. Constitution, where the executive prerogative to convene special legislative sessions has never been doubted. Article II, § 3 of the U.S. Constitution authorizes that the President “may, on extraordinary Occasions, convene both Houses, or either of them. . . .” *Id.* The Supreme Court treats this convening power, housed in Article II (executive powers), as fully discretionary and at the disposal of the President. *See, e.g., Kennedy v. Braidwood Mgmt., Inc.*, 145 S. Ct. 2427, 2769 (2025) (Thomas, J., dissenting) (citations omitted) (“The President ‘may, on extraordinary Occasions, convene both Houses’ of Congress. That provision means that he can *make* Congress meet. . .”). Since the foundation of the Republic, when President Washington

convened the U.S. Senate under art. II, § 3, he did so “without in any manner disclosing what was the ‘extraordinary occasion.’” He did so on at least three subsequent occasions, and since his day at least nine other presidents have done the same thing.” *State ex rel. Andrews v. Quam*, 7 N.W.2d 738, 739 (N.D. 1943). On the contrary, neither the U.S. Supreme Court nor presidential practice have *ever* intimated that any restrictions upon this power exist within the Constitution or without.

3. Gubernatorial discretion to determine “extraordinary occasions” is well-established across the States.

All fifty States have special sessions, sometimes called “extraordinary” sessions. And Defendants have not found *any case* where *any American court* has enjoined a legislature from meeting.

Other state constitutions generally vest the power to call a special session in the governor’s hands, just like in Missouri. Other than Missouri, at least twenty-nine other States use the phrase “extraordinary occasion[s],”⁴ authorizing the Governor to

⁴ See Ala. Const. art. V, title 122 (“The governor may, by proclamation, on extraordinary occasions, convene the legislature at the seat of government. . . .”); Ark. Const. art. VI, § 19 (“The Governor may, by proclamation, on extraordinary occasion, convene the General Assembly at the seat of government. . . .”); Cal. Const. art. IV, § 3(b) (“On extraordinary occasions the Governor by proclamation may cause the Legislature to assemble in special session.”); Colo. Const. art. IV, § 9 (“The governor may, on extraordinary occasions convene the general assembly, by proclamation, stating therein the purpose for which it is to assemble. . . .”); Del. Const. art. III, § 16 (“He or she may on extraordinary occasions convene the General Assembly by proclamation. . . .”); Idaho Const. art. 4, § 9 (“The governor may, on extraordinary occasions, convene the legislature by proclamation, stating the purposes for which he has convened it. . . .”); Kan. Const. art. I, § 5 (“The governor may, on extraordinary occasions, call the legislature into special session by proclamation. . . .”); Ky. Const. § 80 (“He may, on extraordinary occasions, convene the General Assembly at the seat of government. . . .”); Iowa Const. art. IV, § 11 (“He may, on extraordinary occasions,

convene the general assembly by proclamation, and shall state to both houses, when assembled, the purpose for which they shall have been convened.”); Maine Const. art. V, § 13 (“The Governor may, on extraordinary occasions, convene the Legislature; and in case of disagreement between the 2 Houses with respect to the time of adjournment, adjourn them to such time, as the Governor shall think proper, not beyond the day of the next regular session. . . .”); Md. Const. art. II, § 16 (“The Governor shall convene the Legislature, or the Senate alone, on extraordinary occasions. . . .”); Mich. Const. art. V, § 15 (“The governor may convene the legislature on extraordinary occasions.”); Minn. Const. art. V, § 4 (“He may on extraordinary occasions convene both houses of the legislature.”); N.C. Const. art. III, § 9 (“The Governor shall have power, on extraordinary occasions, by and with the advice of the Council of State, to convene the General Assembly in extra session by his proclamation. . . .”); Neb. Const. art. IV, § 8 (“The Governor may, on extraordinary sessions, convene the Legislature by proclamation, stating therein the purpose for which they are convened. . . .”); Nev. Const. art. V, § 9 (“Except as otherwise provided in Section 2A of Article 4 of this Constitution, the Governor may, on extraordinary occasions, convene the Legislature by Proclamation. . . .”); N.Y. Const. art. IV, § 3 (“The governor shall have power to convene the legislature, or the senate only, on extraordinary occasions.”); Ohio Const. art. III, § 8 (“The governor on extraordinary occasions may convene the general assembly by proclamation and shall state in the proclamation the purpose for which such special session is called. . . .”); Okla. Const. art. VI, § 7 (“The Governor shall power to convoke the Legislature, or Senate only, on extraordinary occasions.”); Or. Const. art. V, § 12 (“He may on extraordinary occasions convene the Legislative Assembly by proclamation, and shall state to both houses when assembled, the purpose for which they shall have been convened.”); Pa. Const. art. IV, § 12 (“He may, on extraordinary occasions, convene the General Assembly. . . .”); R.I. Const. art. IX, § 7 (“The governor may, on extraordinary occasions convene the general assembly at any town or city in this state. . . .”); S.C. Const. art. IV, § 19 (“The Governor may on extraordinary occasions convene the General Assembly in extra session.”); Tenn. Const. art. III, § 9 (“He may, on extraordinary occasions, convene the General Assembly by proclamation, in which he shall state specifically the purposes for which they are to convene. . . .”); Tex. Const. art. IV, § 8 (“The Governor may, on extraordinary occasions, convene the Legislature at the seat of Government. . . .”); W. Va. Const. art. VII, § 7 (“The governor may, on extraordinary convene, at his own instance, the Legislature; but when so convened it shall enter upon no business except that stated in the proclamation by which it was called together.”); Wash. Const. art. III, § 7 (“He may, on extraordinary occasions, convene the legislature by proclamation, in which shall be stated the purposes for which the legislature is convened.”); Wisc. Const. art. V, § 4 (“He shall have power to convene the legislature on extraordinary occasions. . . .”); Wyo. Const. art. IV, § 4 (“He shall have power to convene the legislature on extraordinary occasions.”).

call for special sessions. And again and again, courts have *refused to place extra-constitutional restrictions* on the governor's prerogative to call special sessions, the same extra-constitutional restrictions the Plaintiffs ask this Court to impose in a sweeping and unprecedented exercise of its equitable powers. For example, the Constitution of Kansas states: "The governor may, on extraordinary occasions, call the legislature into special session by proclamation. . . ." Kan. Const. art. I, § 5. This clause is materially identical to article IV, § 9 of the Missouri Constitution.

Plaintiffs in *Farrelly v. Cole*, 56 P. 492 (Kan. 1899), in almost exactly the same fashion as Plaintiffs here, challenged the validity of a special session called by the governor on grounds that no extraordinary occasion existed and the governor lacked sufficient reason to issue the proclamation. The Kansas Supreme Court was clear in utterly rejecting this challenge:

This is a power the exercise of which the framers of the constitution have seen fit to intrust to the chief executive officer of the state *alone*. As they have not defined what shall be deemed an extraordinary occasion for this purpose, nor referred the settlement of the question to any other department or branch of the government, *the governor must necessarily be himself the judge, or he cannot exercise the power.*

Farrelly v. Cole, 56 P. 492, 498 (Kan. 1899) (emphasis added). Put simply, the Governor of Kansas, like the Governor of Missouri, has ultimate discretion to deem what is an extraordinary occasion, full stop.

As early 1899, the *Farrelly* court recognized that other States with "extraordinary occasion" special session constitutional provisions reached the same conclusion: Colorado, New York, and Rhode Island. *Farrelly*, 56 P. at 498–499 (citing *In re Governor's Proclamation*, 19 Colo. 33, 33 P. 530 (1894); *People ex rel. Carter v.*

Rice, 20 N.Y.S. 293 (Gen. Term), *aff'd*, 135 N.Y. 473, 31 N.E. 921 (1892); *In re Legislative Adjournment*, 18 R.I. 824, 27 A. 324 (Mem.) (R.I. 1893)). The Washington Supreme Court adopted *Farrelly*'s reasoning that "[i]t was the *exclusive province* of the governor, under the Constitution, to determine whether an occasion existed of sufficient gravity to require an extra session of the Legislative, and his conclusion in that regard is not subject to review by the courts." *State v. Fair*, 76 P. 731, 732 (Wash. 1904) (citing *Farrelly*, 56 Pac. 492). More recently, the Nebraska Supreme Court held that the Nebraska Constitution (also featuring an "extraordinary occasion" special session clause) "permits the Governor to determine when an extraordinary occasion exists, necessitating convention of a special session of the Nebraska Legislature." *Jaksha v. State*, 385 N.W.2d 922, 927 (Neb. 1986).

As noted *supra*, the *Farrelly* court also ruled that the challenge was *nonjusticiable*. The court explained that it would be "an unseemly and unprecedented proceeding for this court, or any court, to entertain a controversy where, by proof obtained from witnesses sworn in the cause, it sought to ascertain judicially whether an extraordinary occasion existed, of sufficient gravity to authorize the governor to convene the legislature in extra session." *Farrelly*, 56 P. at 497. This Court should reject Plaintiffs' invitation to undertake such an inquiry.

4. The Governor had good reasons to call for a special session.

Even if Missouri courts could somehow second-guess a gubernatorial call for a special session, there is no basis to do so here. At least two events justified a special session to draw a new federal congressional map ahead of the 2026 midterm elections.

First, the U.S. Supreme Court is poised to issue a ruling before the 2026 midterm elections that would have put Missouri's prior federal congressional map in legal jeopardy. When the General Assembly drew the prior federal legislative map, the federal Voting Rights Act was widely understood to require state legislatures to intentionally consult racial data to maximize the number of majority-black districts. See *Abbott v. Perez*, 585 U.S. 579, 587 (2018) (“[U]nder certain circumstances, States must draw “opportunity” districts in which minority groups form “effective majorit[ies].”) Consistent with that understanding, the General Assembly intentionally provided for a majority-minority district in the Missouri First Congressional District—centering on St. Louis. See Census Reporter, *Congressional District 1, MO* (2023), <http://censusreporter.org/profiles/50000US2901-congressional-district-1-mo/>.

However, it now appears likely that the U.S. Supreme Court will reverse its prior precedent—and declare the intentional drawing of majority-minority districts unconstitutional under the U.S. Constitution's Equal Protection Clause. Four current Justices have already declared that to be their understanding of federal law. *Allen v. Milligan*, 599 U.S. 1, 79 (2023) (Thomas, J., dissenting) (“Therefore, if complying with a federal statute would require a State to engage in unconstitutional racial discrimination, the proper conclusion is not that the statute excuses the State's discrimination, but that the statute is invalid.”). A fifth Justice—Justice Kavanaugh—suggested he has the same view, but that particular litigants in 2022 failed to make the correct argument. See *id.* at 45 (Kavanaugh, J., concurring)

(“Justice THOMAS notes, however, that even if Congress in 1982 could constitutionally authorize race-based redistricting under § 2 for some period of time, the authority to conduct race-based redistricting cannot extend indefinitely into the future. But Alabama did not raise that temporal argument in this Court....”) (citations omitted). Justice Kavanaugh restated that view again during oral arguments earlier this year in *Louisiana v. Callais*. Transcript of Oral Argument at 10:1-12, *Louisiana v. Callais*, No. 24–109 (U.S. Mar. 24, 2025). And after that argument, the Supreme Court took the unusual step of rescheduling the case for the 2025 Term and explicitly asked for briefing on whether state legislatures violate the U.S. Constitution when they intentionally create federal congressional districts on the basis of race. Order in Pending Cases, *Louisiana v. Callais*, Nos. 24–109, 24–110 (Aug. 1, 2025). Unsurprisingly, many U.S. Supreme Court observers expect the Justices to answer that question in the affirmative. See Erwin Chemerinsky, *The future of voting rights*, SCOTUSblog (Aug. 27, 2025), <https://www.scotusblog.com/2025/08/the-future-of-voting-rights/>.

If the U.S. Supreme Court prohibits race-based redistricting, then Missouri’s prior federal congressional map would be legally jeopardized. Failing to act could result in last-minute litigation over the prior map’s validity in mid-2026—just months before the 2026 midterm elections. Cf. Order Granting Stay, *Ardoyn v. Robinson*, No. 21-1596 (U.S. June 28, 2022) (acknowledging similar last-minute litigation against Louisiana congressional voting map). Understanding that risk, Governor Kehoe logically asked the General Assembly to get out in front of that risk

and draw a new, race-neutral map. If the General Assembly had not done so, it risked mid-2026 litigation over the legality of the prior federal congressional map

Second, Governor Kehoe and the General Assembly could logically seek to redraw Missouri's federal congressional in response to mid-decade redistricting efforts in other States. Although Plaintiffs casually throw around the term "gerrymandering," Pls. Mot. for TRO at 11, the Democratic minority in Missouri has substantially more federal congressional representation than Republican minorities in other States—with Illinois being a particularly notable example that the NAACP apparently is not bothered by.⁵ Now, in recent moves, other States have moved to redistrict mid-decade, with California poised to limit Republicans—who won 38.3% of the vote in the 2024 presidential election—to just likely 7.7% percent of the seats. Associated Press, *California President*, (Nov. 5, 2024), <https://apnews.com/projects/election-results-2024/california/?r=0>; NBC News, *Democrats release plan to boost party's California House seats in fight for Congress*, (Aug. 15, 2025), <https://www.nbcnews.com/politics/2026-election/california-democrats-plan-boost-house-seats-congress-redistricting-rcna225332>; *see also* Sarah J. Eckman & L. Paige Whitaker, Cong. Rsch. Serv., Report No. IF13082, Mid-Decade Congressional Redistricting: Key Issues (2025). If Missouri does not respond to such aggressive tactics in other States, the political strength of a majority of Missouri

⁵ Illinois earns an 'F' from the Gerrymandering Project's Redistricting Report Card. Gerrymandering Project, Redistricting Report Card: Illinois 2021 Congressional – Enacted (May 28, 2025), <https://gerrymander.princeton.edu/redistricting-report-card/?planId=receAu6OJuYEKxKjG>.

voters will be diluted in Washington D.C. compared to the political strength of majorities in other States.

As the Missouri Supreme Court has recognized, redistricting is—at least in part—an inherently political process whereby majorities seek to ensure they are adequately represented in Washington D.C. *Pearson v. Koster*, 359 S.W.3d 35, 39 (Mo. banc 2012) (per curiam) (“[R]edistricting is predominately a political question.”). Here, the Governor and General Assembly could logically seek to implement a new federal congressional map in response to California’s recent aggressive actions.

II. Plaintiffs’ challenge to the General Assembly’s mid-decade redistricting prerogative fails on the merits.

The Court should deny Plaintiffs’ request for a preliminary injunction against the new federal congressional map because their state constitutional challenge is doomed on the merits.

As the Missouri Supreme Court has explained, federal legislative redistricting under article III, § 45 is “political in nature and best left to political leaders, not judges.” *Pearson*, 359 S.W.3d at 39. When judges interfere in legislative redistricting without a strong legal basis, voters will be rightfully suspicious that judges are ruling based on political considerations instead of law. *Rucho v. Common Cause*, 588 U.S. 684, 718 (2019) (“Federal judges have no license to reallocate political power between the two major political parties, with no plausible grant of authority in the Constitution, and no legal standards to limit and direct their decisions.”). And judges must be especially wary of election-related litigation, where there is a risk the plaintiffs are simply trying to “transform federal courts into weapons of political

warfare that will deliver victories that eluded them “in the political arena.”
Alexander v. South Carolina State Conference of the NAACP, 602 U.S. 1, 11 (2024)
 (internal quotation marks and citation omitted).

Here, the Court can easily reject Plaintiffs’ invitation to interfere in the redistricting process because there is no prohibition on mid-decade redistricting. The Missouri Constitution *requires* congressional redistricting after each decennial census, but *does not prohibit* redistricting by the General Assembly at other times. Mo. Const. art. III, § 45. It sets a *floor*, not a *ceiling*. The constitutional language is clear:

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 it may be.
Id.

Under this language, the General Assembly has the unfettered prerogative to adjust federal congressional districts at will because “[t]he general assembly’s authority is plenary, except when express constitutional provisions intervene.” *Blaske*, 821 S.W.2d at 835 (Mo. banc 1991) (quoting *Harrell*, 781 S.W.2d at 63 (Mo. banc 1989)); *see also State v. Clay*, 481 S.W.3d 531, 532–53 (Mo. banc 2016); (“The legislature has the authority to adopt laws, except when *expressly prohibited* by the constitution. . . .”); *State ex rel. Davis v. White*, 63 S.W. 104, 106 (Mo. 1901) (“If the constitution was silent on the subject the general assembly would be absolute in its power.”). Once again, art. III, § 45 sets a *floor*, not a *ceiling*, on the General

Assembly's redistricting powers: it must redistrict *at least* once every decade after the decennial census. It contains *no* criteria temporally limiting the General Assembly's default, reserve powers to legislate reformed districts. Nor does the Constitution include any congressional redistricting restrictions in the "Limitation of Legislative Power" division of article III. Mo. Const. art. III, §§ 36–39(a). Because the Missouri Constitution is silent with respect to mid-decade redistricting, the General Assembly retains the power to act. *See Blaske*, 821 S.W.2d at 835.

Indeed, consistent with article III, § 45's text, the Missouri Supreme Court has recognized only two state constitutional rules that courts can enforce against the General Assembly when it conducts federal legislative redistricting. *See Pearson*, 359 S.W.3d at 40. Federal congressional districts—which are to be contiguous—must be sufficiently compact and have equal populations. *See id.* "As long the districts comply with these constitutional requirements [compactness and equality in population], the circuit court shall respect the *political determinations* of the General Assembly and allow for minimal and practical deviations required to preserve the integrity of the existing lines of our various political subdivisions." *Pearson*, 359 S.W.3d at 40 (citing *State ex rel. Teichman v. Carnahan*, 357 S.W.3d 601 (Mo. banc 2012); *Preisler v. Hearnese*, 362 S.W.2d 552, 556 (Mo. banc 1962)) (emphasis added).

Fabricating a limit on mid-decade redistricting would also have practical problems. State legislatures frequently have to conduct mid-decade redistricting in response to court orders. *Kirkpatrick v. Preisler*, 394 U.S. 526, 527–28 (1969) (discussing how Missouri passed a redistricting statutes to comply with the Supreme

Court's ruling in *Wesberry v. Sanders*, 376 U.S. 1 (1964)). But if Plaintiffs are correct, it is not clear whether the General Assembly would have the power to act if a court enjoined a federal congressional map mid-decade. Indeed, in this situation, the Governor and General Assembly have good reasons to believe the prior map could be rendered illegal by the U.S. Supreme Court's anticipated decision in *Louisiana v. Callais*. There is no sound basis for reading the Missouri Constitution to interfere with the General Assembly's intent to solve federal legal problems with the prior map.

The Court should dismiss Plaintiffs' request to enjoin the pending legislative redistricting legislation as they cannot succeed on the merits.

III. Plaintiffs identify no irreparable harm.

Finally, Plaintiffs identify no irreparable harm justifying the imposition of temporary or preliminary injunctive relief.

Temporary restraining orders and preliminary injunctions are "extraordinary" remedies. *Mazurek v. Armstrong*, 520 U.S. 968, 972 (1997) (emphasis in original) (quoting 11 Wright & Miller, *Federal Practice and Procedure* § 2948, pp. 129–130 (2d ed. 1995)). Courts cannot issue them unless the movant "demonstrate[s] 'that irreparable harm will result if the injunction is not granted.'" *McAlister v. Strohmeier*, 395 S.W.3d 546, 551 (Mo. App. W.D. 2013) (quoting *City of Kansas City v. New York-Kansas Bldg. Assoc., L.P.*, 96 S.W.3d 846, 855 (Mo. App. W.D. 2002)).

Here, Plaintiffs have identified no irreparable harm. They have complained that the General Assembly's special session could create "additional costs attributable to the legislative session," like additional legislator *per diems*. Pls. Mot.

for TRO at 12. But those expenses have already been distributed, and injunctive relief will do nothing to limit or recover those costs.

Plaintiffs also speculate that “interested parties” might have to “travel to Jefferson City” to lobby the General Assembly. Pls. Mot. for TRO at 12. Once again, injunctive relief cannot recover any voluntarily-made expenditures that were already made in opposing the map because the legislative session is over.

Finally, Plaintiffs cite more abstract irreparable harms like “harm [to] voting rights,” “uncertainty in district boundaries,” and “undue burden for legislators.” Pls. Mot. for TRO at 12. But Plaintiffs do not need injunctive relief to prevent these harms. There is ample time for litigation over the new federal legislative map. The new map will not be used until 2026, which means that litigation in the ordinary course can resolve legitimate challenges to the proposed map. Indeed, the ACLU has already filed a lawsuit challenging the new map on compactness and equal-population grounds, *Wise et al. v. State of Missouri et al.*, case no. 2516-CV29597 (filed Sept. 12, 2025)—i.e., the two legitimate state-constitutional grounds to challenge districting maps. Because there is ample time to adjudicate such claims through ordinary litigation, Plaintiffs will suffer no irreparable harm if the Court denies immediate relief.

On the other hand, preliminary injunctive relief would impose profound irreparable harm on the State. If the Court accepted Plaintiffs’ request to enjoin the General Assembly from meeting, the separation of powers in Missouri would be devastated, and the General Assembly and Governor would have to scramble to

determine the legal status of the legislative actions taken during the special session. If the Court enjoined the new federal legislative map, such hasty injunctive relief would yield “much harm . . . before the final [merits] decision in the district court.” *Abbott v. Perez*, 585 U.S. 579, 595 (2018). In either event, the State would be forced to immediately seek appellate review of any preliminary injunction, imposing burdens on the State and Missouri’s appellate courts before any final judgment is issued. Such litigation-related chaos is utterly unwarranted where, again, the Court can timely resolve Plaintiffs’ challenges on the merits—without granting rushed emergency relief.

CONCLUSION

The Court should deny Plaintiffs' motion. Additionally, the Court should dismiss Counts I and III for lack of justiciability.

Respectfully submitted,

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was filed and served electronically on all counsel of record via the Court's e-filing system on September 14, 2025.

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

**MO STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF
COLORED PEOPLE, et. al.**

Plaintiffs,

v.

Case No. 25AC-CC06724

MIKE KEHOE et.al.

Defendants

**PLAINTIFFS' RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS**

I. INTRODUCTION

Defendants' Motion to Dismiss Plaintiffs' Petition should be Denied as moot. Pursuant to Rule 55.33, Plaintiff has filed an Amended Petition before Defendants filed a responsive pleading. See Rules 55.01, 55.25, 55.27 (a responsive pleading does not include a motion to dismiss). The Amended Petition includes, but is not limited to, challenges to any legislation passed by the General Assembly, presented to the Governor and/or signed. Accordingly, regardless of whether the Governor signs challenged legislation by the time this Court hears and rules on Plaintiff's TRO is immaterial. Missouri Courts have exclusive jurisdiction over this matter, and this Court should promptly grant Plaintiff's Motion for TRO.

**II. MISSOURI COURTS HAVE EXCLUSIVE JURISDICTION TO DECIDE
CHALLENGES THE CONSTITUTIONAL LIMITS PLACED ON THE
EXECUTIVE AND LEGISLATIVE BRANCHES**

The Missouri Supreme Court shall have exclusive appellate jurisdiction in all cases involving the validity of a statute or provision of the constitution of Missouri. Mo. Const. art. V, § 3. "[I]t is emphatically the province and duty of the judicial department to say what the law is,"

Mo. Coal. for Env't v. Joint Comm. on Admin. Rules, 948 S.W.2nd 125, 132 (Mo. 1997), quoting *Marbury v. Madison*, 1 Cranch 137, 5 U.S. 137, 2 L.Ed. 60 (1803); and *State ex rel. Praxair, Inc. v. Mo. Pub. Serv. Comm'n*, 344 S.W.3d 178, 186 (Mo. banc 2011), citing *Marbury*. “This power is a non-delegable power resting exclusively with the judiciary.” *Praxair*. Applying these constitutional principles, the judiciary has exclusive jurisdiction and authority to determine whether a Branch of Government has exceeded its constitutional authority. *See Mo. Coal., supra*, 133-134 (holding that legislature improperly exercised executive rulemaking power). Consistent with these principles, the Legislature has granted authority to circuit courts to make determinations regarding rights and remedies, and to restrain action pending such a determination on the merits. Sections 527.010, 526.050 RSMo. Constitutional challenges are reviewed de novo. *Legends Bank v. State*, 361 S.W.3d 382, 386 (Mo. 2012) (regarding constitutionality of a statute). “[I]f an act of the legislature clearly and undoubtedly violates a constitutional procedural limitation, this Court will hold it unconstitutional.” *Id.*

Here, Plaintiffs challenge the authority of the Governor and Legislature to act, as they have, under the limits of Article III and IV of the Missouri Constitution. Plaintiff challenge the constitutionality of Governor Kehoe's August 29, 2025 Proclamation convening an extraordinary session of the Missouri General Assembly, challenge the General Assembly's actions in response, convening a special session, under Article III, § 45, and challenge constitutionality of HB1 and HJR3, apparently since passed, and any subsequent presentment and/or signing by the Governor. This case presents important questions of constitutional interpretation regarding the Governor's authority under Article IV, Section 9 that are capable of repetition yet evading review, and likewise presents important questions regarding the interpretation of Article III, Section 45, and other relative provisions of the Missouri Constitution. The Court should deny Defendants' motion to

dismiss, promptly grant Plaintiffs' Motion for Temporary Restraining Order, and address the merits of Plaintiffs' claims to prevent future constitutional violations.

III. PLAINTIFFS HAVE STANDING TO CHALLENGE THE PROCLAMATION

Defendants' separation of powers argument fundamentally misunderstands the role of judicial review in our constitutional system. As shown above, Missouri courts have exclusive jurisdiction to rule regarding the interpretation of the Missouri Constitution and to apply its limits on other branches. the Missouri Supreme Court recognized in *State ex rel. Praxair, Inc. v. Mo. Pub. Serv. Comm'n*, courts have the authority to “make final determinations of questions of law.” The doctrine of separation of powers “does not erect an impenetrable wall of separation between the departments of government.” *Chastain v. Chastain*, 932 S.W.2d 396 (Mo. 1996).

Plaintiffs have standing as Missouri citizens and taxpayers who are directly affected by the Governor's allegedly unconstitutional convening of the legislature. The irreparable harms alleged include:

1. **Financial Harm:** The extraordinary session cost taxpayers in excess of \$25,000 per day based on per diem and mileage payments authorized by Sections 21.140 and 21.145.
2. **Procedural Harm:** The undue burden on interested parties to travel to Jefferson City for public hearings and participate in the legislative process outside the usual timeframe.
3. **Democratic Process Harm:** Uncertainty in district boundaries for constituents and potential candidates for office.

These concrete harms provide Plaintiffs with the requisite standing to challenge Defendants' actions.

IV. THE CASE IS NOT MOOT AND PRESENTS ISSUES CAPABLE OF REPETITION YET EVADING REVIEW

While HB1 and HJR3 have been enacted, this case is not moot for several reasons:

A. Continuing Constitutional Violations

The constitutional violations alleged by Plaintiffs continue beyond the legislative session itself. Any legislation enacted pursuant to an unconstitutional Proclamation remains tainted by that constitutional defect. As this Court recognized in *State ex rel. Department of Penal Institutions v. Becker*, 47 S.W.2d 781 (Mo. 1932), legislation passed during an unlawfully called extraordinary session is invalid.

B. Capable of Repetition Yet Evading Review

The Governor's practice of calling extraordinary sessions on increasingly routine matters presents a recurring constitutional issue that will evade review due to the compressed timeframes involved. The legislative process at issue here moved so quickly that by the time meaningful judicial review could occur, the session had concluded. This is precisely the type of case where the "capable of repetition yet evading review" exception to mootness applies.

As discussed, the judiciary has exclusive jurisdiction to interpret the Missouri Constitution and apply its limits. There is apparently no Missouri decision interpreting the meaning of an "extraordinary occasion," which is a limitation on the Governor's authority under Article IV, Section 9 of the Missouri Constitution. Missouri courts "must uphold the mandatory language of the constitution," including provisions of "shall." *Pearson v. Koster*, 359 S.W.3d 35, 39 (Mo. banc 2012).

There apparently no Missouri case law which interprets the meaning of an "extraordinary occasion" regarding the Governor's limited ability to call for a special session under Article IV, section 9. Applying the language of the Missouri constitution, including the mandatory provisions,

no “extraordinary occasion” has occurred to justify the Governor’s call for a special session of the Legislature, and none of the requirements have been met to require the Legislature enact redistricting laws.

Looking to the language of the Missouri constitution as previously applied, prior proclamations by the Missouri Governor indicated that an “extraordinary occasion” included circumstances such as responding to a world-wide pandemic such as COVID-19, giving rise to the need for an expedited legislative session because the General Assembly was unable to meet in time to address such an emergency pertaining to public health. See Governor’s Proclamation, July 15, 2020, “due to the COVID-19 outbreak, the General Assembly was unable to meet ...” therefore “on the extraordinary occasion that exists in the State of Missouri,” See MO Register Vo. 45 No. 16 (pp. 1211-1296), August 17, 2020.

The Governor previously indicated “additional immediate legislative measures must be taken to provide for the economic recovery from COVID-19 by providing liability protection ... on the extraordinary occasion that exists in the State of Missouri...” And see Executive Order, Governor’s Proclamation, Special Message, November 12, 2020, MO Register Vol. 45 No. 24 (pp. 1949-1998), Dec. 15, 2020; and Governor’s Proclamation, August 10, 2020, MO Register Vo. 45 No. 18 (p. 1333-1366) (regarding “unprecedented wave of violent crime existing in Missouri’s urban areas ... on the extraordinary occasion that exists...”). Other states such as Kentucky have concluded that an “extraordinary measure” includes an emergency threatening public health and welfare like the pandemic. *Beshear v. Acree*, 615 S.W.3d 780, 807 (Ky. 2020) (“the ‘extraordinary occasion’ ... of a global pandemic gives rise to an obvious emergency”).

Whereas Governor's call is in excess of his constitutional authority, then the Legislature is likewise limited in authority convene because there was, in effect, no valid call under the Missouri

Constitution. This Court should exercise its constitutional authority, and promptly enter a Temporary Restraining Order, to prevent further actions by the Governor and General Assembly, which have exceeded their constitutional limitation.

V. PLAINTIFFS HAVE STATED VALID CLAIMS FOR RELIEF

A. Count I: The Proclamation Fails to State an Extraordinary Occasion

Article IV, Section 9 requires that the Governor may only convene the legislature “on extraordinary occasions.” The term “extraordinary occasion” has a specific meaning requiring “a set of circumstances that require action or bring about an event.”

The facts alleged in the Petition demonstrate no such extraordinary circumstances:

1. No new census has been conducted requiring redistricting under Article III, Section 45.
2. No federal action has triggered the constitutional redistricting process.
3. Most initiative petition reforms sought were already enacted in Senate Bill 152.
4. No court has ordered new congressional maps.

The Governor's own statements reveal the political rather than extraordinary nature of the Proclamation. Press reports indicate that “President Trump has been pressuring Gov. Mike Kehoe to call a special session for mid-decade redistricting” to “dilute Democratic voting power.” Political ambitions of national figures do not constitute an “extraordinary occasion” under the Missouri Constitution.

VI. INJUNCTIVE RELIEF IS THE APPROPRIATE REMEDY

Defendants’ argument that mandamus is the exclusive remedy lacks merit. Missouri courts have consistently recognized that “there is very little difference in its practical results between proceedings in mandamus and by mandatory injunction” where the same court has both legal and

equitable jurisdiction. *State ex rel. Shartel v. Humphreys*, 338 Mo. 1091, 93 S.W.2d 924, 926 (Mo. 1936).

The *American Civil Liberties Union of Missouri v. Ashcroft* case provides instructive guidance on when injunctive relief is appropriate to address constitutional violations by state officials. 577 S.W.3d 881 (Mo. App. 2019). There, the court recognized that permanent injunctive relief can properly "compel the undoing of something wrongfully done" by state officials acting beyond their statutory authority.

Here, Plaintiffs seek declaratory judgment regarding the scope of the Governor's constitutional authority and prospective injunctive relief to prevent similar constitutional violations in the future. This is precisely the type of constitutional oversight that courts are empowered to provide.

VII. THE PUBLIC INTEREST SUPPORTS JUDICIAL REVIEW

The Missouri Constitution guarantees that "all political power is vested in and derived from the people." Mo. Const. art. I, § 2. When government officials act outside their constitutional authority, "courts must act to 'restrain unlawful acts of municipal officials which affect the rights of the public.'" *State ex rel. Ellis v. Brown*, 326 S.W.2d 752, 754 (Mo. App. 1959).

The public interest strongly favors judicial clarification of the constitutional limits on the Governor's power to convene extraordinary sessions. Without such clarification, governors may continue to circumvent the constitutional requirements and waste taxpayer resources on unnecessary legislative sessions.

VIII. CONCLUSION

Defendants' motion to dismiss should be denied as moot. Plaintiffs have standing to challenge the Governor's constitutional authority, the judiciary has exclusive jurisdiction to rule

on the constitutional limitations on the Governor and the General Assembly, and Plaintiffs have stated valid claims for relief, and seek appropriate remedies. The constitutional questions presented are of significant public importance and require prompt judicial resolution to prevent future violations.

The Court should proceed to the merits of Plaintiffs' claims and provide the declaratory and injunctive relief requested to ensure that future extraordinary sessions are called only when truly extraordinary occasions warrant such action.

WHEREFORE, Plaintiffs respectfully request that this Court deny Defendants' Motion to Dismiss and proceed to consider the merits of Plaintiffs' constitutional claims, and promptly grant Plaintiffs' Motion for Temporary Restraining Order without any delay.

Respectfully submitted,

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 Email: sharon@jonesadvocacy.com

/s/ Nimrod T. Chapel, Jr.
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/s/ C. Austin Reams
 C. Austin Reams (#66825)
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 Email: austin@reams.law

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 15th day of September, 2025, the foregoing was filed via the Missouri eFiling System and that a copy of the same was thus served via the electronic filing system in accordance with Supreme Court Rules.

/s/ Sharon Geuea Jones
Attorney for Plaintiffs

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
SERVICE EMAIL: nimrod@chapellaw.com

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant
SERVICE EMAIL: louis.capozzi@ago.mo.gov

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
MISSOURI STATE CONFERENCE)
et. al.)
Plaintiffs,)

v.)

Case No. 25AC-CC06724

MICHAEL KEHOE in his official)
capacity as Governor of Missouri)
et. al.)
Defendants)

REQUEST FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION

ENTRY OF APPEARANCE

The undersigned, C. Austin Reams hereby enters his appearance as co-counsel of record
on behalf of Plaintiffs in the above-entitled matter.

I certify that I am admitted to practice before this court.

Respectfully submitted,

/s/C. Austin Reams

C. Austin Reams #66825

REAMS LAW

9208 North Kelley Ave.

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Fax: 405-840-1164

austin@reams.law

ATTORNEYS FOR PLAINTIFFS

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 15th day of September 2025, the foregoing was filed via the Missouri eFiling System and that a copy of the same was thus served via the electronic filing system in accordance with Supreme Court Rules.

Document Not an Official Court Document Not an Official Court Document /s/Nimrod T. Chapel, Jr. Not an Official

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SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
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SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant
 SERVICE EMAIL: louis.capozzi@ago.mo.gov

SERVICE PARTY: SHARON GEUEA JONES, Attorney for Plaintiff
 SERVICE EMAIL: sharon@jonesadvocacy.com

STATE OF MISSOURI
FOR THE NINETEENTH JUDICIAL CIRCUIT
COLE COUNTY, MISSOURI

NATIONAL ASSOCIATION FOR)
THE ADVANCEMENT OF COLORED)
PEOPLE MISSOURI STATE)
CONFERENCE; PATRICIA A.)
JONES and TRACI L. WILSON)
KLEEKAMP,)

Plaintiffs,)

-vs-)

No. 25AC-CC06724

MICHAEL KEHOE, *in his official*)
capacity as Governor of Missouri;)
ANDREW BAILEY, *in his official*)
capacity as Attorney General of)
Missouri; CINDY O'LAUGHLIN in)
her official capacity as State Senator)
and President Pro Tem of the Senate;)
and JON PATTERSON, *in his official*)
capacity as State Representative and)
Speaker of the House,)

Defendants.)

ENTRY OF APPEARANCE

Assistant Solicitor General Joseph James Maurey Kiernan enters his
appearance on behalf of Defendants.

Dated: September 16, 2025 Respectfully submitted,

CATHERINE HANAWAY
Missouri Attorney General
/s/ Joseph James Maurey Kiernan

Joseph James Maurey Kiernan #77798

Assistant Solicitor General

Office of Missouri Attorney General

815 Olive Street, Suite 200

St. Louis, Missouri 63101

(573) 690-2426

Joseph.Kiernan@ago.mo.gov

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2025, the foregoing Entry of Appearance was filed electronically using the Court's CM/ECF system, which sends notification to all counsel of record.

/s/ Joseph James Maurey Kiernan

Joseph James Maurey Kiernan

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
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SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant
SERVICE EMAIL: louis.capozzi@ago.mo.gov

SERVICE PARTY: SHARON GEUEA JONES, Attorney for Plaintiff
SERVICE EMAIL: sharon@jonesadvocacy.com



Summons in Civil Case

IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI

Judge or Division: CHRISTOPHER KIRBY LIMBAUGH	Case Number: 25AC-CC06724	
Plaintiff/Petitioner: NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE	Plaintiff's/Petitioner's Attorney/Address NIMROD THOMAS CHAPEL 311 W. DUNKLIN ST. JEFFERSON CITY, MO 65101	
vs.		
Defendant/Respondent: MICHAEL KEHOE	Court Address: PO BOX 1870 301 E HIGH ST JEFFERSON CITY, MO 65101	(Date File Stamp for Return)
Nature of Suit: CC Temporary Restraining Order		

The State of Missouri to: **STATE OF MISSOURI**
Alias:

227 E. HIGH ST.
JEFFERSON CITY, MO 65101

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

COURT SEAL OF



COLE COUNTY

16-SEP-2025

Date

/s/MarkEichholz/zf

Clerk

Further Information:

Officer's or Server's Return

Note to serving officer: Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.
- ☐ (for service on a corporation) delivering a copy of the summons and petition to:
Winderlyn Woodard (name) Designated Employee (title).
Mo. Attorney General
- ☐ other: _____

Served at 221 W. High, Jefferson City (address)
 in Cole (County/City of St. Louis), MO, on Sept. 17, 2025 (date)
 at 10:18 A.M. (time).

Stephen R. Waters
 Printed Name of Officer or Server

[Signature]
 Signature of Officer or Server

Must be sworn before a notary public if not served by an authorized officer.

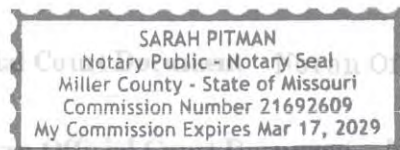
Subscribed and sworn to before me on 9/17/2025 (date).

(Seal)

My commission expires: 03-17-2029 [Signature]
 Date Notary Public

Service Fees (if applicable)

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary _____
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (Court miles @ \$._____ per mile)
Total \$ _____



A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: PETER FRANCIS DONOHUE, Attorney for Defendant
 SERVICE EMAIL: peter.donohue@ago.mo.gov

SERVICE PARTY: JOSEPH JAMES MAUREY KIERNAN, Co-Counsel for Defendant
 SERVICE EMAIL: joseph.kiernan@ago.mo.gov

SERVICE PARTY: LOUIS CAPOZZI, Attorney for Defendant
 SERVICE EMAIL: louis.capozzi@ago.mo.gov

SERVICE PARTY: SHARON GEUEA JONES, Attorney for Plaintiff
 SERVICE EMAIL: sharon@jonesadvocacy.com



Summons in Civil Case

IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI

Judge or Division: CHRISTOPHER KIRBY LIMBAUGH	Case Number: 25AC-CC06724	
Plaintiff/Petitioner: NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE	Plaintiff's/Petitioner's Attorney/Address NIMROD THOMAS CHAPEL 311 W. DUNKLIN ST. JEFFERSON CITY, MO 65101	
vs.		
Defendant/Respondent: MICHAEL KEHOE	Court Address: PO BOX 1870 301 E HIGH ST JEFFERSON CITY, MO 65101	
Nature of Suit: CC Temporary Restraining Order		(Date File Stamp for Return)

The State of Missouri to: **STATE OF MISSOURI**
Alias:

**227 E. HIGH ST.
JEFFERSON CITY, MO 65101**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

COURT SEAL OF



COLE COUNTY

16-SEP-2025

Date

/s/MarkEichholz/zf

Clerk

Further Information:

Officer's or Server's Return

Note to serving officer: Service should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).

☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date)
at _____ (time).

Printed Name of Officer or Server

Signature of Officer or Server

Must be sworn before a notary public if not served by an authorized officer.

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Service Fees (if applicable)

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

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

**MO STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF
COLORED PEOPLE, et. al.**

Plaintiffs,

v.

Case No. 25AC-CC06724

MIKE KEHOE et.al.

Defendants

MOTION FOR EXPEDITED RULING ON THE MERITS OF CONSTITUTIONAL CLAIMS

COMES NOW Plaintiffs, by and through undersigned counsel, and respectfully move this Court for an expedited ruling on the merits of their constitutional claims challenging the Governor's extraordinary session proclamation, and in support thereof state:

I. BACKGROUND AND PROCEDURAL POSTURE

1. This case presents constitutional questions of first impression regarding the Governor's authority under Article IV, Section 9 of the Missouri Constitution to convene an extraordinary legislative session.
2. Following procedural delays and arguments begging for additional delay raised by the Missouri Attorney General, this Court conducted a hearing on September 15, 2025.
3. Both parties have now fully articulated their positions through comprehensive briefing and oral argument.
4. The constitutional issues presented are ripe for judicial determination and require no further factual development.

II. LEGAL BASIS FOR EXPEDITED RULING

5. Certainty of an appeal regardless of outcome is guaranteed. No matter how this Court rules on the constitutional questions presented, the losing party will seek appellate review. If

Plaintiffs' constitutional challenge is denied, Plaintiffs will appeal. If Plaintiffs prevail, the Missouri Attorney General will appeal. The parties and affected citizens would be well served by an expedited decision.

6. Ongoing irreparable harm is growing. The uncertainty surrounding the constitutional validity of the Governor's proclamation and the legislation passed thereunder continues to cause irreparable harm to Plaintiffs and Missouri citizens in various forms, including:

- o Uncertainty regarding congressional district boundaries;
- o Confusion over ballot initiatives and voting procedures; and
- o Continued taxpayer burden from the questionable legislative session and cost of litigation to defend the actions of the legislature.

7. Questions suitable for immediate resolution can be resolved now. The constitutional issues presented are pure questions of law that do not require additional evidence or factual development.

III. PUBLIC INTEREST IN PROMPT RESOLUTION

8. These constitutional questions affect fundamental democratic processes and voting rights that demand prompt judicial resolution.

9. Continued delay in resolving the constitutional validity of the extraordinary session and resulting legislation creates ongoing uncertainty for Missouri voters, candidates, and election officials.

10. The separation of powers issues presented require clear judicial guidance to prevent future constitutional violations.

IV. REQUEST FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court:

A. Grant this Motion for Expedited Ruling on the Merits;

B. Issue a final ruling on the questions presented regarding the Governor's authority under Article IV, Section 9 of the Missouri Constitution;

C. Declare that the Governor's August 29, 2025 proclamation exceeded his constitutional authority;

D. Enjoin implementation of legislation passed pursuant to the constitutionally invalid proclamation; and

E. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Nimrod T. Chapel, Jr.

Nimrod T. Chapel, Jr. #46875

THE CHAPEL LAW GROUP LLC

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Fax: 405-840-1164

austin@reams.law

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 1st day of October 2025, the foregoing was filed via the Missouri eFiling System and that a copy of the same was thus served via the electronic filing system in

accordance with Supreme Court Rules.

/s/Nimrod T. Chapel, Jr
Attorney for Plaintiffs

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

**NATIONAL ASSOCIATION FOR THE)
ADVANCEMENT OF)
COLORED PEOPLE)
MISSOURI STATE CONFERENCE)
et. al.)**

Plaintiffs,

**v.)
MICHAEL KEHOE in his official)
capacity as Governor of Missouri)
et. al.)**

Defendants

Case No.

PROPOSED INJUNCTION AND RULING ON THE MERITS

NOW on this ____ day of October 2025, the Court, having reviewed Plaintiff's Petition for Declaratory Judgment and Preliminary and Permanent Injunctions, the accompanying memorandum, affidavit(s), and exhibits, and being fully advised in the premises, finds that immediate and irreparable injury, loss, or damage will result to Plaintiffs if Defendants are not restrained. In Support thereof the Court makes the following findings:

1. The Governor's Proclamation convening the General Assembly in an extraordinary session failed to provide any evidence of an extraordinary occasion to justify the Proclamation.
2. Article IV, Section 9 requires such justification prior to the convening of the General Assembly.
3. Plaintiffs have and will continue to suffer irreparable harm in the form of costs to taxpayers for the convening, costs to the taxpayers for litigation following the extraordinary session, costs to taxpayers related to the placing of a Constitutional Amendment on the ballot, as well as non-monetary harm in the form of uncertainty and confusion to the voting public.

4. The extraordinary session was convened based upon a flawed Proclamation and was therefore the General Assembly lacked authority to conduct business or pass legislation during said extraordinary session.

5. Any legislation passed during the extraordinary session convened pursuant to the August 29, 2025 Proclamation is therefore void.

6. The public interest supports injunctive relief because clarifying the parameters of the Governor's Constitutional authority is necessary to prevent the waste of taxpayer dollars and confusion regarding the law.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED THAT:

1. The Governor's Proclamation is insufficient under Article IV, Section 9;
2. Defendants and their agents are hereby enjoined from implementing any legislation or joint resolutions passed pursuant to the Proclamation;
3. Declare any legislation passed pursuant to the Proclamation is hereby declared void;
4. Plaintiffs are awarded reasonable costs under Section 527.100.

SO ORDERED.

Dated this ____ day of October 2025. _

JUDGE OF THE CIRCUIT COURT
Cole County, Missouri

Based on the Supreme Court Rules governing eFiling, an eService email has been issued to the following parties:

SERVICE PARTY: NIMROD THOMAS CHAPEL, Attorney for Plaintiff
 SERVICE EMAIL: nimrod@chapellaw.com

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