

Journal of the Senate

SECOND REGULAR SESSION

SEVENTIETH DAY - THURSDAY, MAY 28, 2026

The Senate met pursuant to adjournment.

Senator O’Laughlin in the Chair.

RESOLUTIONS

On behalf of Senators Coleman and McCreery, Senator O’Laughlin offered Senate Resolution No. 1065, regarding Dr. Jerry Katz, St. Louis, which was adopted.

On behalf of Senator Mosley, Senator O’Laughlin offered Senate Resolution No. 1066, regarding Lieutenant General Russel L. Honoré, which was adopted.

REPORTS OF STANDING COMMITTEES

On behalf of Senator Luetkemeyer, Chair of the Committee on Rules, Joint Rules, Resolutions and Ethics, President Pro Tem O’Laughlin submitted the following reports:

Madam President: Your Committee on Rules, Joint Rules, Resolutions and Ethics, to which were referred **SS for SB 834, CCS for HCS for SS for SCS for SBs 835 and 1111, SS No. 2 for SB 863, HCS for SS for SCS for SB 878, SS for SCS for SB 890, SS for SCS for SB 903, SS for SCS for SB 905, SS for SB 913, SS for SCS for SB 916, HCS for SS for SB 937, SB 938, HCS for SB 953, SCS for SB 959, CCS for HCS for SS for SCS for SB 973, CCS for HCS for SS for SB 975, SS for SCS for SBs 977 and 1011, SS No. 2 for SB 999, SS for SB 1000, SS for SB 1002, HCS for SB 1019, SS for SB 1033, SB 1067, SB 1119, SS for SB 1135, HCS for SS No. 2 for SB 1233, SB 1408, CCS for SS for SB 1421, HCS for SB 1470, HCS for SB 1544, SS for SB 1553, HCS for SB 1572, SB 1576, SB 1629, SCS for SCR 21, CCS for HCS for SS for SJR 87, and SS for SCS for SJR 95**, begs leave to report that it has examined the same and finds that the bills, joint resolutions, and concurrent resolution have been duly enrolled and that the printed copies furnished the Senators are correct.

SIGNING OF BILLS

The President Pro Tem announced that all other business would be suspended and **SS for SB 834, CCS for HCS for SS for SCS for SBs 835 and 1111, SS No. 2 for SB 863, SS for SCS for SB 890, SS for SCS for SB 903, SS for SCS for SB 905, SS for SCS for SB 916, HCS for SS for SB 937, SB 938, HCS for SB 953, SCS for SB 959, CCS for HCS for SS for SB 975, SS for SCS for SBs 977 and 1011, SS for SB 1000, SS for SB 1033, SB 1067, SB 1119, SS for SB 1135, SB 1408, HCS for SB 1470, SS for SB 1553, HCS for SB 1572, SB 1576, SB 1629, CCS for HCS for SS for SJR 87, and SS for SCS for SJR 95**, having passed both branches of the General Assembly, would be read at length by the Secretary, and if no objections be made, the bills and joint resolutions would be signed by the President Pro Tem to the end that they may become law. No objection being made, the bills and joint resolutions were so read by the Secretary and signed by the President Pro Tem.

Also,

The President Pro Tem announced that all other business would be suspended and **SS for SCS for HCS for HB 1696, SS for SCS for HB 1740, SS for SCS for HB 1825, HB 1827, HCS for HBs 1839, 2921, and 3015, SS No. 2 for SCS for HCS for HB 1840, HB 1867, SS for SCS for HCS for HB 1871, SCS for HB 1940, CCS for SS for SCS for HCS for HB 2002, CCS for SS for SCS for HCS for HB 2003, CCS for SS for SCS for HCS for HB 2004, CCS for SS for SCS for HCS for HB 2005, CCS for SS for SCS for HCS for HB 2006, CCS for SS for SCS for HCS for HB 2007, CCS for SS for SCS for HCS for HB 2008, CCS for SS for SCS for HCS for HB 2009, CCS for SS for SCS for HCS for HB 2010, CCS for SS for SCS for HCS for HB 2011, CCS for SS for SCS for HCS for HB 2012, CCS for SS for SCS for HCS for HB 2013, SS for SCS for HCS for HB 2017, SCS for HCS for HB 2018, SS for SCS for HCS for HB 2019, SS for SCS for HCS for HB 2020, HCS for HB 2057, SCS for HCS for HB 2108, SS No. 2 for SCS for HCS for HB 2292, HCS for HBs 2366 and 2511, SS for SCS for HCS for HB 2372, SS for HB 2397, SCS for HCS for HB 2474, SS for SCS for HCS for HB 2508, HB 2586, SS for SCS for HB 2593, CCS for SS for HCS for HB 2596, SS for HB 2636, CCS for SS for SCS for HB 2818, HCS for HB 2819, HB 2885, SS for SCS for HB 2896, SS for HCS for HB 2974, HCS for HB 3080, and HB 3279**, having passed both branches of the General Assembly, would be read at length by the Secretary, and if no objections be made, the bills would be signed by the President Pro Tem to the end that they may become law. No objections being made, the bills were so read by the Secretary and signed by the President Pro Tem.

OBJECTIONS

Senator Moon submitted the following:

May 28, 2026

Kristina Martin
Secretary of the Senate
201 W. Capitol Avenue
Jefferson City, MO 65101

CONSTITUTIONAL OBJECTION – HCS SS SCS SB 878

Missouri’s Constitution, Article III, section 21 states: “No bill shall be so amended in its passage through either house as to change its original purpose.”

Article III, Section 23 states: “No bill shall contain more than one subject which shall be clearly expressed in its title...”

As introduced, SB (Senate Bill) 878 was narrowly directed toward the duties and authority of pharmacists, specifically:

- medication therapeutic plan authority under Section 338.012;
- repeal of statewide standing-order language;
- rulemaking authority of the Board of Pharmacy and State Board of Registration for the Healing Arts; and
- authorization for pharmacists to prescribe durable medical equipment.

The introduced bill possessed a limited and identifiable original purpose concerning pharmacist scope of practice and medication therapy authority.

However, the truly agreed and finally passed version substantially transformed the legislation into a broad omnibus encompassing numerous additional and distinct policy areas, including:

- regulation of methamphetamine precursor sales and tracking fees;
- criminal penalties imposed upon manufacturers;
- vaccine administration authority;
- dispensing of ivermectin and hydroxychloroquine without prescriptions;
- interstate pharmacy emergency waivers;

- regulation of 340B drug reimbursement practices;
- insurance coverage mandates regarding non-opioid drugs; and
- mandatory maternity coverage for home blood pressure monitoring devices and services.

These provisions extend far beyond the original purpose of pharmacist therapeutic authority and instead create an expansive regulatory framework involving criminal law, insurance law, pharmaceutical re-imbursement, public health mandates, and health benefit coverage requirements.

The Missouri Supreme Court has repeatedly held that amendments may not alter the original purpose of legislation during passage. While details germane to a bill's original objective may be expanded, the Constitution prohibits transforming a narrowly focused bill into a materially different legislative vehicle.

The final version of SB 878 no longer maintains a natural and logical connection to the bill as introduced. Instead, the bill became a vehicle for numerous independent healthcare and insurance provisions originating from separate legislation.

Additionally, SB 878 raises serious concerns under Article III, Section 23. The Missouri Constitution requires legislation to contain only one subject clearly expressed in the title. The inclusion of criminal law provisions relating to methamphetamine precursor regulation, pharmacy scope-of-practice expansions, insurance reimbursement mandates, opioid coverage restrictions, and maternity monitoring requirements creates multiple distinct subjects lacking the constitutionally required unity.

The constitutional purpose of Section 23 is to prevent legislative logrolling and to provide fair notice to legislators and the public. Combining disparate healthcare, criminal, and insurance provisions into a single bill undermines those constitutional protections.

For these reasons, the bill appears constitutionally suspect under both Article III, Sections 21 and 23 of the Missouri Constitution and I urge Governor Kehoe to exercise his authority to veto HCS SS SCS SB (House Committee Substitute Senate Substitute Senate Committee Substitute Senate Bill) 878.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
Secretary of the Senate
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CONSTITUTIONAL OBJECTION – SS SB 913

Article III, Section 38(a) provides, in part, that the General Assembly shall have no power to grant public money or a thing of value in aid of any private person, association, or corporation except as constitutionally authorized for a valid public purpose.

SS SB (Senate Substitute Senate Bill) 913 extends and expands numerous industry-specific tax credit programs benefiting private commercial entities, including:

- railroad infrastructure tax credits;
- rolling stock tax credits;
- biodiesel production and retail sale tax credits;
- ethanol fuel tax credits;
- meat processing facility investment tax credits;
- agricultural production tax credits;
- urban farm tax credits; and
- specialty agricultural crop tax credits.

Of particular constitutional concern is the railroad infrastructure tax credits authorized under Section 135.1210. These credits authorize substantial transferable tax benefits for private railroad expenditures and private rail-served customer projects.

The Missouri Supreme Court's decision in *Curchin v. Missouri Industrial Development Board*, 722 S.W.2d 930 (Mo. banc 1987), is directly relevant to this legislation.

In *Curchin*, the Court explained the historical purpose underlying Article III, Section 38(a), observing that:

"it was the custom of the state to give large sums of money to railroads, canals, banks and so forth and the custom became so abused that nearly all the state constitutions wrote such sections as this in their fundamental law."

The Court further stated:

"Article IV, Section 46 of the Missouri Constitution of 1875, the predecessor to Article III, Section 38(a) ... was adopted to prevent railroad grants."

The railroad infrastructure tax credits contained in SS SB 913 raise precisely the constitutional concerns identified in *Curchin*. The act grants substantial public financial benefits through transferable tax credits to private railroad operators and related commercial entities.

As the Court warned in *Curchin*:

"Providing the tax credits to only a select few companies lends itself to abuse and is analogous to the railroad grants of yesteryear..."

That warning applies directly here.

Although the act is framed as economic development legislation, Article III, Section 38(a) exists specifically to prevent the use of public resources to subsidize private commercial enterprises under the guise of public benefit. Tax credits constitute a thing of value because they reduce public revenue otherwise available for public purposes and confer direct financial advantages upon selected private industries.

The concentration of these credits among specific industries and identifiable commercial beneficiaries raises substantial constitutional concerns regarding whether the dominant effect of the legislation is public benefit or private enrichment.

Additionally, the transferability of certain credits further increases the resemblance to the type of public-private subsidy arrangements that Article III, Section 38(a) was intended to prohibit.

While economic development may constitute a valid public purpose in some circumstances, the Missouri Supreme Court has made clear that the Constitution imposes meaningful limitations on the use of public resources for private commercial advantage.

For these reasons, I urge Governor Kehoe to veto SS SB 913.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
Secretary of the Senate
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CONSTITUTIONAL OBJECTION: CCS HCS SS SCS SB 973

Missouri's Constitution, Article III, section 21 states, "No bill shall be so amended in its passage through either house as to change its original purpose."

Further, Article III, section 23 further says, "No bill shall contain more than one subject which shall be clearly expressed in its title..."

As introduced, SB (Senate Bill) 973 was narrowly focused upon disclosures by residential real estate wholesalers. The bill aimed to regulate:

- disclosures in wholesale residential property transactions;
- consumer protections;
- cancellation rights;
- enforcement under the Missouri Merchandising Practices Act; and
- Attorney General enforcement authority.

The introduced bill contained a limited and identifiable original purpose concerning consumer protection in residential real estate wholesaling transactions.

The truly agreed and finally passed version substantially expanded the bill into a broad omnibus containing many additional governmental and regulatory subjects, including:

- delinquent real estate tax foreclosure procedures;
- land bank governance and powers;
- land tax collection procedures;
- public sewer district provisions;
- sale-leaseback regulation;
- municipal and county land bank administration; and
- modifications to governmental tax enforcement authority.

These additions transformed the legislation far beyond the original consumer disclosure purpose of the bill.

The Missouri Supreme Court has repeatedly emphasized that Article III, Sections 21 and 23 are mandatory constitutional limitations designed to prevent surprise, logrolling, and the combination of unrelated legislative subjects.

In *Hammerschmidt v. Boone County*, the Court explained, “The test for one subject is whether all provisions of the bill fairly relate to the same subject, have a natural connection therewith or are incidents or means to accomplish its purpose.”

Likewise, in *Missouri Roundtable for Life v. State*, the Court reaffirmed, “The single subject rule would become meaningless if the legislature were able” to combine unrelated subject matter under broad legislative labels.

The Court further explained that Article III, Section 23 exists to “facilitate orderly procedure, avoid surprise, and prevent ‘logrolling.’”

The final version of SB 973 raises those exact constitutional concerns.

Although the bill is broadly titled as relating to “real estate transactions,” the Missouri Supreme Court has warned against defining legislative subjects so expansively that constitutional limitations lose meaning. The final bill combines consumer protection provisions governing real estate wholesalers with:

- tax foreclosure law;
- municipal land bank governance;
- local governmental powers;
- sewer district administration; and
- delinquent tax collection procedures.

These are distinct governmental and legal subjects that do not naturally connect merely because they involve property in some manner.

Additionally, Article III, Section 21 prohibits legislation from being amended so as to change its original purpose during passage. In *Stroh Brewery Co. v. State*, the Court emphasized that constitutional procedural safeguards exist to prevent the attachment of additional legislative subjects unrelated to the bill as introduced.

SB 973 began as a consumer disclosure bill directed toward residential wholesaling practices. It concluded as a broad omnibus property governance and tax administration measure.

The provisions concerning:

- land banks,
- tax foreclosure,
- land tax collection,
- and public sewer districts

materially exceed the original purpose of the bill and introduce independent governmental subjects not reasonably contemplated by the introduced legislation.

Due to these reasons, the Truly Agreed and Finally Passed version appears to violate Article III, sections 21 and 23 of the Missouri constitution, I urge Governor Kehoe to veto CCS HCS SS SCS SB (Conference Committee Substitute House Committee Substitute Senate Substitute Senate Committee Substitute Senate Bill) 973.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
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CONSTITUTIONAL OBJECTION - SS#2 SB 999

Missouri's constitution, Article III, section 21 states, "No bill shall be so amended in its passage through either house as to change its original purpose."

Article III, section 23 further states, "No bill shall contain more than one subject which shall be clearly expressed in its title...."

As introduced, SB (Senate Bill) 999 related to abortion, changing one new section of law. And, bill was narrowly focused upon the "Born-Alive Abortion Survivors Protection Act." The bill addressed:

- protections for children born alive during or after abortion procedures;
- duties of healthcare providers;
- abortion-related criminal penalties; and
- abortion-related civil liability.

The introduced bill therefore included a specific and identifiable original purpose concerning abortion-related protections for born-alive children.

The Truly Agreed and Finally Passed version affected 22 sections of law and substantially transformed the bill into an omnibus relating to numerous additional and unrelated criminal and governmental subjects, including:

- prosecutorial assistance in sexual offense cases;
- modifications to the Pregnancy-Associated Mortality Review Board;
- bond and recognizance violations;
- assault and domestic violence offenses;
- stalking and harassment offenses;
- cyber-harassment;
- cyber-stalking;
- disclosure of intimate digital depictions;
- sadistic online exploitation; and
- numerous revisions to Missouri criminal statutes unrelated to abortion procedures or born-alive infants.

These additions materially exceed the original purpose of the bill and create serious constitutional concerns under Article III, sections 21 and 23.

The question of whether or not these additional topics would be germane to the original purpose of SB 999 is a weak one, at best. For example, what is the relationship between providing appropriate medical care to a child who endured a procedure intended to end his life and cyber-harassment or cyber-stalking? No need to end there – is there a connection between disclosing intimate digital photos or sadistic online exploitation and the bill's original focus? Unless, the letters used to make up the words is the bonding agent, there is none!

In *Stroh Brewery Co. v. State*, the Missouri Supreme Court emphasized that Article III, Section 21 exists to prevent legislation from being amended during passage so as to become fundamentally different from the bill originally introduced.

Likewise, in *Hammerschmidt v. Boone County*, the Court explained:

"The test for one subject is whether all provisions of the bill fairly relate to the same subject, have a natural connection therewith or are incidents or means to accomplish its purpose."

The final version of SB 999 fails that constitutional standard. While the introduced bill concerned abortion-related protections for born-alive infants, the final bill includes broad criminal-law revisions relating to cybercrime, stalking, harassment, digital exploitation, domestic violence, and prosecutorial authority. These subjects do not naturally connect to the original abortion-related purpose of the legislation.

Additionally, in *Missouri Roundtable for Life v. State*, the Missouri Supreme Court warned that the constitutional single-subject limitation becomes meaningless if legislative subjects are defined too broadly.

The final title of SB 999 — “relating to vulnerable persons” — seems to be just what the court warned against. Under such a definition, virtually any criminal law, healthcare law, or public safety measure could be included within a single omnibus bill. Such a construction would defeat the constitutional protections designed to:

- facilitate orderly legislative procedure;
- provide fair notice to legislators and the public;
- prevent surprise in legislation; and
- prohibit legislative logrolling.

The provisions concerning:

- cyber-harassment,
- cyber-stalking,
- disclosure of intimate digital depictions,
- sadistic online exploitation,
- and bond-release violations

are vastly different from the original purpose of the introduced legislation and illustrate the unconstitutional expansion of the bill during passage.

Yet, legislators often attempt to reason that the original purpose is not the purpose of the bill when introduced, but that which is Truly Agreed (to) and Finally Passed. It amazes me that adults engage in childish, elementary games focusing on the meaning of relatively simple words. One such ‘game’ was played during the Second Regular Session of the 103rd General Assembly. During the deliberation of a bill, a senator made an argument against a bill using the same logic described in this letter. The same senator later made an argument in support another bill – again, using the logic contained herein. The difference was, the argument in support was a bill he wanted to send to the governor’s desk. The argument in opposition was a bill for which he didn’t want to advance.

Perhaps, the court can provide some ‘narrow’ guidelines by which legislators can easily follow.

I urge Governor Kehoe to veto SS#2 SB (Senate Substitute #2 Senate Bill) 999.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
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CONSTITUTIONAL OBJECTION – SS SB 1002

The Missouri Constitution, Article III, section 42 states, “Where a general law can be made applicable, no local or special law shall be enacted.”

Senate Bill (SB) 1002 modifies election procedures for school districts in which a majority of the district is located within St. Charles County.

Additionally, SB 1002:

- alters the timing of school board elections;
- permits partisan designation of school board candidates;
- modifies term lengths;
- and changes procedures relating to school tax and bond elections.

These provisions are to be applied only to school districts located primarily within a single county.

The Missouri Constitution prohibits legislation that singles out a particular locality or political subdivision where a general statewide law could reasonably apply. Missouri already maintains comprehensive statewide statutes governing:

- school board elections;

- candidate qualifications;
- election timing;
- and school tax elections.

SB 1002 creates a separate statutory framework applicable only to one county without establishing a constitutionally sufficient basis for unequal treatment.

The Missouri Supreme Court has repeatedly held that legislation is unconstitutional as a special law when it applies to some but not all similarly situated political subdivisions without a substantial and rational justification.

In *Jefferson County Fire Protection Districts Association v. Blunt*, the Court emphasized that legislation violates Article III, Section 42 when similarly situated entities are treated differently without a reasonable basis tied to the legislation's purpose.

Likewise, in *City of Springfield v. Sprint Spectrum*, the Court explained that courts must examine whether legislative classifications are genuinely open and reasonably related to the purpose of the law, rather than arbitrary geographic distinctions designed to target a particular locality.

SB 1002 appears to create precisely the type of geographically isolated classification prohibited by Article III, Section 42. The bill does not establish a broad, open-ended statewide classification. Instead, it directly targets school districts located primarily within St. Charles County for election procedures different from those applicable to all other Missouri school districts.

Clearly, a general (statewide) law governing school district elections could be made applicable. If the legislature wishes to modify school election procedures, such changes may be enacted uniformly across the state or through constitutionally permissible classifications supported by genuine statewide distinctions.

The narrow county-specific application of SB 1002 raises substantial constitutional concerns that the legislation constitutes an unlawful local or special law enacted in violation of Article III, Section 42 of the Missouri Constitution.

In addition, in cases where special laws are permissible, Article III, section 42 requires, "Proof of publication shall be filed with the general assembly before the act shall be passed and the notice shall be recited in the act." No record of the publication being filed with the general assembly has been found and no citation of the publication was cited in SB 1002.

Therefore, I respectfully urge Governor Kehoe to veto SS SB (Senate Substitute Senate Bill) 1002.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
Secretary of the Senate
201 W. Capitol Avenue
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CONSTITUTIONAL OBJECTION – HCS SB 1019

The Missouri Constitution, Article III, sections 21 states, "No bill shall be so amended in its passage through either house as to change its original purpose."

Article III, Section 23 further continues, "No bill shall contain more than one subject which shall be clearly expressed in its title...."

As introduced, SB (Senate Bill) 1019 was narrowly directed toward matters involving hospital investment authority and hospital service areas. The introduced legislation addressed operational and governance matters relating to municipal hospitals and hospital districts.

The original purpose of the bill was therefore limited and identifiable:

- hospital governance;
- hospital operational authority; and
- hospital investment and service area provisions.

As introduced, SB 1019 concerned the investment of funds and hospital service-area authority involving municipal hospitals and hospital districts. The introduced legislation therefore possessed a narrow and identifiable purpose relating to hospital operational authority and financial management.

The truly agreed and finally passed version expanded the legislation, adding relating to Lyme disease and tick-borne illness information, education, and related health matters.

These additions materially expand the legislation beyond the original purpose of the bill.

The Missouri Supreme Court has repeatedly emphasized that Article III, Sections 21 and 23 are mandatory constitutional safeguards intended to prevent surprise legislation, legislative logrolling, and the attachment of unrelated subjects to pending bills.

In *Hammerschmidt v. Boone County*, the Court explained:

“The test for one subject is whether all provisions of the bill fairly relate to the same subject, have a natural connection therewith or are incidents or means to accomplish its purpose.”

The final version of SB 1019 fails that constitutional standard. While the introduced bill addressed investment authority and operational matters involving hospitals and hospital districts, the final legislation includes provisions concerning Lyme disease and tick-borne illness education and public health information. These subjects do not naturally connect to the original financial and operational purpose of the introduced bill.

Additionally, in *Missouri Roundtable for Life v. State*, the Missouri Supreme Court warned that the constitutional single-subject limitation becomes meaningless when legislative subjects are defined too broadly.

Perhaps, the Missouri General Assembly needs a reminder, from the Court. More than once, a legislator who earned a degree in law, attempted to explain that a bill’s subject (and, the title) can be expanded in order to include additional topics. Most often, the change in the bill’s purpose was necessary in order for amendments to appear related to the bill. While some may find the gobbledygook humorous, the nonsensical explanation accepted by the majority of the members of the General Assembly is no laughing matter.

The final title of SB 1019, now HCS SB 1029, “relating to health care,” is expansive. Under such a broad construction, virtually any medical, hospital, disease-related, or public-health provision could be combined into a single omnibus bill, defeating the constitutional protections intended to:

- facilitate orderly legislative procedure;
- provide fair notice to legislators and the public;
- prevent surprise in legislation; and
- prohibit legislative logrolling.

The Lyme disease provisions are particularly remote from the original purpose of the introduced legislation concerning hospital investment authority and service areas.

In *Stroh Brewery Co. v. State*, the Missouri Supreme Court emphasized that Article III, Section 21 prohibits legislation from being amended during passage so as to materially change its original purpose.

SB 1019 began as legislation concerning hospital investment authority and ended to include language regulating Lyme disease and tick-borne illness matters. Unless, HCS SB (House Committee Substitute Senate Bill) 1019 is intended to provide legislative authority for funds to be invested in the Plum Island Animal Disease Center for the purpose of weaponizing the Lone Star tick, it appears that the legislators have lost their way on this one.

For these reasons, HCS SB 1019 appears constitutionally suspect under Article III, Sections 21 and 23 of the Missouri Constitution.

Accordingly, I urge Governor Kehoe to veto HCS SB 1019.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
Secretary of the Senate
201 W. Capitol Avenue
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CONSTITUTIONAL OBJECTION – HCS SS#2 SB 1233

The Missouri Constitution, Article III, sections 21 states, “No bill shall be so amended in its passage through either house as to change its original purpose.”

Article III, Section 23 further continues, “No bill shall contain more than one subject which shall be clearly expressed in its title....”

As introduced, SB (Senate Bill) 1233 was primarily directed toward licensing requirements and professional standards relating to certified public accountants and accountant licensure.

The truly agreed and finally passed version substantially expanded the bill to include numerous additional and independent professional and healthcare regulatory subjects, including:

- practice of dentistry in correctional centers;
- social work supervisor provisions;
- administration of certain vaccines by pharmacists;
- emergency waivers of Missouri pharmacy rules and regulations;
- interior designer regulation;
- wholesale drug distributor licensing; and
- additional occupational and healthcare licensing provisions.

Perhaps, I overlooked the necessary additional requirement for the licensing of accountants, in that the prospective accountant could assist a correctional center dentist by counting the number of an inmate’s teeth. Of course, that is a stretch by anyone’s imagination. In all seriousness, these additions greatly exceed the original purpose of the introduced legislation.

The Missouri Supreme Court has repeatedly emphasized that Article III, Sections 21 and 23 are mandatory constitutional safeguards intended to prevent surprise legislation, legislative logrolling, and the attachment of unrelated subjects to pending bills.

In *Hammerschmidt v. Boone County*, the Court explained:

“The test for one subject is whether all provisions of the bill fairly relate to the same subject, have a natural connection therewith or are incidents or means to accomplish its purpose.”

The final version of SB 1233 fails that constitutional standard. While the introduced bill concerned accountant licensure and related professional standards, the final legislation includes provisions concerning correctional dentistry, pharmacist vaccine administration, emergency pharmacy regulatory waivers, social work supervision, and multiple unrelated healthcare licensing systems.

These provisions do not naturally connect to the original purpose of the bill.

Additionally, in *Missouri Roundtable for Life v. State*, the Missouri Supreme Court warned that the constitutional single-subject limitation becomes meaningless when legislative subjects are defined too broadly.

The final title of SB 1233 — “relating to activities requiring licensure” — is impermissibly expansive. Under such a broad construction, virtually every regulated profession, occupation, healthcare activity, or licensed commercial practice in Missouri could be combined into a single omnibus bill. Such a construction defeats the constitutional protections intended to:

- facilitate orderly legislative procedure;
- provide fair notice to legislators and the public;
- prevent surprise in legislation; and
- prohibit legislative logrolling.

The provisions concerning:

- dentistry in correctional facilities;
- pharmacist vaccine authority;
- emergency pharmacy waivers; and
- social work supervision

are particularly remote from the original accountant-licensure purpose of the introduced legislation and illustrate the unconstitutional expansion of the bill during passage.

In *Stroh Brewery Co. v. State*, the Missouri Supreme Court emphasized that Article III, Section 21 prohibits legislation from being amended during passage so as to substantially change its original purpose.

SB 1233 began as legislation concerning accountant licensure and concluded as a broad omnibus occupational and healthcare licensing bill.

In addition, the bill contains a severability clause. Although not specified in the bill, itself, the general assembly was proactive during this legislative session to include severability clauses in the hope that, if a court found a bill to be in violation of the state constitution, specifically, Article III, sections 21 and 23, the court might decide to simply strike the offending section from the bill, as opposed to striking the entire bill. Pretty clever, I might add. My hope is that the court will see beyond the cleverness and strike the entire bill anyway.

Before the bill was amended, the purpose was changed from relating to the licensing of accounts to relating to activities requiring licensure.

Was the title change required in order to add the various amendments to the Truly Agreed and Finally Passed version? It certainly appears so.

For these reasons, I urge Governor Kehoe to veto HCS SS#2 SB (House Committee Substitute Senate Substitute #2 Senate Bill) 1233.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
Secretary of the Senate
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CONSTITUTIONAL OBJECTION – CCS SS SB 1421

The Missouri Constitution, Article III, sections 21 states, “No bill shall be so amended in its passage through either house as to change its original purpose.”

Article III, Section 23 further continues, “No bill shall contain more than one subject which shall be clearly expressed in its title....”

As introduced, SB (Senate Bill) 1421 was narrowly focused upon unlawful activity involving unmanned aircraft systems. The introduced legislation was narrowly focused to address:

- unlawful drone operations;
- unmanned aircraft activity near correctional facilities;
- critical infrastructure protections;
- open-air facility protections; and
- law-enforcement mitigation authority relating to unmanned aircraft systems.

The introduced bill therefore possessed a specific and identifiable original purpose relating to regulation of unlawful drone activity and unmanned aircraft systems affecting public safety.

The truly agreed and finally passed version substantially expanded the bill into a broad omnibus criminal-law and public-safety measure containing numerous additional and unrelated subjects, including:

- Attorney General investigator provisions;
- assault and domestic violence revisions;
- stalking and harassment offenses;
- cyber-harassment;
- cyber-stalking;
- digital exploitation offenses;
- jail-release violations; and
- numerous additional criminal code revisions unrelated to unmanned aircraft systems.

These additions do not appear to be in the least related to drones. What am I missing? The amendments have no recognizable relationship. As such, the bill exceeds the original purpose of the introduced legislation and creates substantial constitutional concerns under Article III, Sections 21 and 23.

The Missouri Supreme Court has repeatedly emphasized that Article III, Sections 21 and 23 are mandatory constitutional safeguards intended to prevent surprise legislation, legislative logrolling, and the attachment of unrelated legislative subjects to pending bills.

In *Hammerschmidt v. Boone County*, the Court explained, “The test for one subject is whether all provisions of the bill fairly relate to the same subject, have a natural connection therewith or are incidents or means to accomplish its purpose.”

The final version of SB 1421 fails that constitutional standard. While the introduced bill concerned unmanned aircraft systems and drone-related public safety protections, the final legislation includes broad criminal-law revisions concerning cybercrime, domestic violence, stalking, harassment, jail-release violations, and digital exploitation offenses. These subjects do not naturally connect to the original purpose of regulating unlawful drone activity.

Additionally, in *Missouri Roundtable for Life v. State*, the Missouri Supreme Court warned that the constitutional single-subject limitation becomes meaningless when legislative subjects are defined too broadly.

The final title of SB 1421 — “relating to public safety” — is impermissibly expansive. Under such a broad construction, virtually any criminal law, law-enforcement provision, correctional statute, or public-order regulation could be combined into a single omnibus bill. Such a construction defeats the constitutional protections intended to:

- facilitate orderly legislative procedure;
- provide fair notice to legislators and the public;
- prevent surprise in legislation; and
- prohibit legislative logrolling.

The provisions concerning:

- cyber-harassment;
- cyber-stalking;
- assault and domestic violence revisions;
- digital exploitation offenses; and
- jail-release violations

are particularly remote from the original unmanned-aircraft purpose of the introduced legislation and illustrate the unconstitutional expansion of the bill during passage.

In *Stroh Brewery Co. v. State*, the Missouri Supreme Court emphasized that Article III, Section 21 prohibits legislation from being amended during passage so as to materially change its original purpose.

SB 1421 began as legislation concerning unmanned aircraft systems and concluded as a broad omnibus criminal-law and public-safety bill. Was a change in the title (a reflection of the purpose) required in order for the amendments to ‘fit’ onto the bill? It seems to be the case.

For these reasons, CCS SB (Conference Committee Substitute Senate Bill) 1421 appears constitutionally suspect under Article III, Sections 21 and 23 of the Missouri Constitution.

Accordingly, I respectfully urge Governor Kehoe to veto CCS SB 1421.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
Secretary of the Senate
201 W. Capitol Avenue
Jefferson City, MO 65101

CONSTITUTIONAL OBJECTION – HCS SB 1544

In the Missouri Constitution, Article III, Section 38(a) the General Assembly is prohibited from granting public money or a thing of value in aid of private individuals, associations (*Curchin v. Missouri Industrial Development Board*, 722 S.W.2d 930 (Mo. banc 1987), or corporations except where such expenditures serve a constitutionally permissible public purpose.

SB (Senate Bill) 1544 authorizes numerous memorial highway and bridge designations throughout the State of Missouri. While several designations under the act expressly require funding through private donations, other provisions specifically require that the costs of the designations be paid by the Missouri Department of Transportation using public funds.

The bill expressly provides that costs for certain memorial designations, “shall be paid by the Department of Transportation.”

Those publicly funded designations include:

- Carl G Koester Memorial Highway;

- Army SSG Salvatore Palazzolo Memorial Bridge;
- Captain Vernon Collett Memorial Highway;
- Dr Tommy Macdonnell Memorial Bridge;
- Firefighter Paramedic Graham J Hoffman Memorial Highway;
- PVT William W Smith Memorial Bridge;
- CPL Vernon D Jobe Memorial Bridge;
- PVT Charles A Paxton Memorial Bridge;
- Army PFC Gary Prather Memorial Highway;
- Police Chief Richard A Hughes Memorial Highway; and
- Fallen Veterans POW/MIA Highway.

These provisions require expenditure of public transportation funds for commemorative and honorary naming purposes.

The Missouri Constitution imposes meaningful limitations upon the use of public funds. Article III, Section 38(a) exists to prevent the expenditure of public resources for primarily private or special interests absent a sufficient public purpose.

Although commemorative memorials may carry symbolic public value, SB 1544 creates distinctions within the legislation itself by requiring some memorial designations to be funded privately while directing that others be funded by taxpayers through the Department of Transportation.

This inconsistent treatment raises substantial constitutional concerns regarding:

- whether the expenditures primarily serve governmental transportation purposes;
- whether the expenditures instead serve private commemorative interests; and
- whether public transportation revenues may constitutionally be diverted for honorary naming purposes unrelated to roadway construction, maintenance, or operational safety.

The Missouri Supreme Court has repeatedly recognized that Article III, Section 38(a) serves as a constitutional limitation upon the use of public resources for non-governmental purposes.

Where private funding mechanisms are available and expressly utilized elsewhere within the same act, the decision to expend public funds for selected memorial designations raises additional constitutional concerns regarding preferential treatment and the absence of a uniform public-purpose justification.

Accordingly, I respectfully urge Governor Kehoe to veto HCS SB (House Committee Substitute Senate Bill) 1544.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
Secretary of the Senate
201 W. Capitol Avenue
Jefferson City, MO 65101

CONSTITUTIONAL OBJECTION – SS#2 SCS HS HB 2576

The Introduced version and the Truly Agreed and Finally Passed version of HB (House Bill) 2576, while appearing to travel down the same path, differ substantially with regard to the constitutional requirement for a single purpose as defined in Article III, section 21 of the Missouri Constitution. In addition, the final version is inconsistent in the appropriation of public funds for private causes as noted in Article III, section 38(a) of the State Constitution.

As introduced, HB 2576 was a narrow and limited measure intended to designate a single bridge in honor of one Missourian. During the legislative process, however, the bill was substantially expanded through amendment and substitution into a broad omnibus designation bill containing numerous highway, bridge, memorial, and infrastructure naming provisions involving multiple unrelated honorees and differing funding mechanisms.

Article III, Section 21 of the Missouri Constitution states, “No bill shall be so amended in its passage through either house as to change its original purpose.”

The dramatic expansion of HB 2576 from a single commemorative designation into a statewide package of multiple memorial designations raises a substantial constitutional concern as to whether the bill's original purpose was materially altered during passage. While 21 provisions generally involve transportation-related memorials, 27 do not. The final legislation appears to go far beyond the limited and specific purpose reflected in the bill as originally introduced. The accumulation of numerous independent designations and funding provisions transformed the legislation from a singular honorary act into a much broader omnibus memorial and state designation program.

If Missouri residents read the version of HB 2576, introduced on December 23, 2025, they might have likely approved of the bill – even though, public funds were to be used for the single designation.

If the same individual, while approving the introduced version of HB 2576, looked again at the Truly Agreed and Finally Passed version, passed on May 15, 2026, they would likely be surprised by the growth of the bill which includes not one, but 48 state designations (such as “Racquetball Day” and the stripping of the designation of Kansas City Chiefs as the state’s official football team and swapping it for another).

Would it not have been more in keeping with the State Constitution to have a bill, with the original purpose of state designations, introduced at the beginning of session? Or, better yet, the governor could issue executive orders for such designations. Much legislative time could be saved in doing so.

Additionally, Article III, Section 38(a) prohibits the granting or use of public money for private purposes (*Curchin v. Missouri Industrial Development Board*, 722 S.W.2d 930 (Mo. banc 1987)). The final version of HB 2576 reportedly contains a mixture of memorial designations funded through private contributions and others funded through public resources. This inconsistent treatment raises legitimate constitutional concerns regarding the expenditure of taxpayer funds for honorary recognitions that may primarily benefit private individuals, families, or organizations rather than serving a sufficiently defined governmental purpose.

While memorial signage and commemorative naming may, in some circumstances, constitute a permissible public purpose, the absence of a clear and uniform funding standard within HB 2576 raises concerns regarding whether public funds are being selectively used for essentially private honorary recognition. The constitutional concern is heightened where similarly situated designations are treated differently, with some requiring private payment while others impose costs upon the public treasury.

For these reasons, I urge Governor Kehoe to veto SS#2 SCS HS HB (Senate Substitute #2 Senate Committee Substitute House Substitute House Bill) 2576.



Mike Moon
District 29

Also

May 28, 2026

Kristina Martin
Secretary of the Senate
201 W. Capitol Avenue
Jefferson City, MO 65101

CONSTITUTIONAL OBJECTION – CCS SS SCS HCS HBs 2637 & 3155

Upon introduction, the original purpose of House Bills (HBs) 2637 and 3155 was relating to *criminal offenses* which affected twenty-eight sections of Missouri’s revised statutes. The House Judiciary committee changed the (original) purpose of the bills relating to *terms of sentencing* which affected twenty-seven new sections of Missouri’s revised statutes.

When the bills were heard in the Senate Judiciary and Civil Jurisprudence committee, the scope of the combined bills was increased to thirty-four new sections, still relating to terms of sentencing. During deliberation by the senate, the bill was broadened to include sixty-one new sections, now relating to the *criminal justice system*.

When the bills, now joined as one, were Truly Agreed and Finally Passed, it had grown to include ninety-four new sections and an all-encompassing title relating to *public safety*.

A question comes to mind, “Was it necessary to change the title (ultimately, the purpose) in order for the additional sections to fit?”

In the bills’ original purpose *criminal offenses*, a sentencing calculation, including jail time credit was the focus. The Truly Agreed and Finally Passed version, included salary schedules for prosecuting attorneys; the creation of the “Missouri State Prosecutorial Services Grant Fund” (to be used to pay salaries of prosecutors); juvenile fingerprinting; compensation for the attorney for the sheriff of the City of St. Louis; a juvenile detention facility and the authorizing of a voter approved tax to fund the facility; certification of a juvenile as an adult; juvenile court proceedings; orders of protection for cyber-stalking; sex offender registry changes; new definitions for certain criminal offenses, including dangerous felonies; credit for jail time; changes in sentencing for sexual offenses; the unlawful use of unmanned aircraft (drones); mental health programs for first responders; and, a section relating to the department of mental health.

To the question of whether or not each of the added sections would have fit if the original purpose (criminal offenses) had not been changed, consider the following:

<u>Original Purpose</u>	<u>Addition</u>	<u>Title Change Required?</u>
Criminal Offenses	Prosecutor Salary Schedules	Yes
	Prosecutorial Grand Fund	Yes
	Sheriff Compensation	Yes
	Juvenile Facility Vote	Yes
	Mental Health	Yes

The Constitution of Missouri states, in Article III, section 21, "... no bill shall be so amended through its passage through either house as to change its original purpose. A quick review of the changes made to CCS SS SCS HCS HBs (Conference Committee Substitute Senate Substitute Senate Committee Substitute House Committee Substitute House Bills) 2637 & 3155 clearly show that an expanded purpose was required in order to add the majority of amendments.

On occasion, a legislator has attempted to explain to me that the original purpose of a bill is not the first version introduced, but it is the truly agreed and finally passed version. Often, the one attempting to make this point is one who 'earned' a law degree. I'm still 'scratching my head' trying to understand this 'lawyer logic'.

Because of its similarity to SB 26 (2021), which was overturned due to the addition of unrelated topics, I encourage Governor Kehoe to veto CCS SS SCS HCS HBs 2637 & 3155.



Mike Moon
District 29

Also,

May 28, 2026

Kristina Martin
Secretary of the Senate
201 W. Capitol Avenue
Jefferson City, MO 65101

CONSTITUTIONAL OBJECTION – SS#2 SCS HCS HBs 3231 & 2531

I respectfully submit the following objections to HB (House Bill) 3231 and HB 2531 based upon apparent violations of the Missouri Constitution.

House Bill (HB) 3231 and 2531 appear to violate Article III, Section 21 of the Missouri Constitution, which prohibits a bill from being amended during the legislative process so as to change its original purpose. As introduced, the bills were presented under a narrower and more specific purpose. Through successive committee substitutes, floor amendments, and conference modifications, the legislation appears to have evolved into a substantially broader economic development and incentive package. The final product bears only a limited resemblance to the legislation originally presented to legislators and the public. Where a bill begins with one purpose and concludes with another, Article III, Section 21 is implicated.

Also, the legislation appears to violate Article III, Section 23, which requires that a bill contain only one subject that is clearly expressed in its title. The final versions of HB 3231 and HB 2531 contain numerous provisions benefiting different industries, projects, financing mechanisms, and incentive programs. While these provisions may be broadly characterized as "economic development," such a broad description risks rendering the constitutional single-subject requirement meaningless. The Missouri Constitution was designed to prevent omnibus legislation that combines multiple distinct policy initiatives into a single bill, thereby depriving legislators and citizens of fair notice regarding the bill's contents. To the extent the legislation combines unrelated subjects under the broad umbrella of economic development, it raises serious concerns under Article III, Section 23.

In addition, the legislation raises concerns under Article III, Section 38(a), which prohibits the General Assembly from granting public money or property to private persons, associations, or corporations except for a legitimate public purpose. Numerous provisions within the legislation appear to provide direct financial benefits, tax advantages, subsidies, credits, abatements, or other economic preferences to identifiable private entities and private commercial interests. Although proponents may characterize these provisions as promoting economic development, the

Constitution requires more than a speculative public benefit. Where public funds, public credit, or public resources are directed toward private beneficiaries, the State must demonstrate that the primary purpose is public rather than private.

Missouri's constitutional restrictions on public aid to private interests were adopted in response to historical abuses involving the use of public resources for private enterprises (*Curchin v. Missouri Industrial Development Board*, 722 S.W.2d 930 (Mo. banc 1987)). These protections remain essential safeguards against the transfer of taxpayer resources to favored private interests. To the extent HB 3231 and HB 2531 authorize or facilitate such transfers, they warrant careful constitutional scrutiny.

For these reasons, I respectfully urge Governor Kehoe to veto SS#2 SCS HCS HBs (Senate Substitute #2 Senate Committee Substitute House Committee Substitute House Bills) 3231 & 2531.



Mike Moon
District 29

SIGNING OF BILLS

The President Pro Tem announced that all other business would be suspended and **HCS for SS for SCS for SB 878, SS for SB 913, CCS for HCS for SS for SCS for SB 973, SS No. 2 for SB 999, SS for SB 1002, HCS for SB 1019, HCS for SS No. 2 for SB 1233, CCS for SS for SB 1421, and HCS for SB 1544**, having passed both branches of the General Assembly, would be read at length by the Secretary, and, the objections notwithstanding, the bills would be signed by the President Pro Tem to the end that they may become law. The bills were so read by the Secretary and signed by the President Pro Tem.

Also,

The President Pro Tem announced that all other business would be suspended and **SS No. 2 for SCS for HS for HB 2576, CCS for SS for SCS for HCS for HBs 2637 and 3155, and SS No. 2 for SCS for HCS for HBs 3231 and 2531**, having passed both branches of the General Assembly, would be read at length by the Secretary, and, the objections notwithstanding, the bills would be signed by the President Pro Tem to the end that they may become law. The bills were so read by the Secretary and signed by the President Pro Tem.

JOINT RESOLUTIONS DELIVERED TO THE SECRETARY OF STATE

CCS for HCS for SS for SJR 87 and SS for SCS for SJR 95, after having been duly signed by the Speaker of the House of Representatives in open session, were delivered to the Secretary of State by the Secretary of the Senate.

BILLS DELIVERED TO THE GOVERNOR

SS for SB 834, CCS for HCS for SS for SCS for SBs 835 and 1111, SS No. 2 for SB 863, HCS for SS for SCS for SB 878, SS for SCS for SB 890, SS for SCS for SB 903, SS for SCS for SB 905, SS for SB 913, SS for SCS for SB 916, HCS for SS for SB 937, SB 938, HCS for SB 953, SCS for SB 959, CCS for HCS for SS for SCS for SB 973, CCS for HCS for SS for SB 975, SS for SCS for SBs 977 and 1011, SS No. 2 for SB 999, SS for SB 1000, SS for SB 1002, HCS for SB 1019, SS for SB 1033, SB 1067, SB 1119, SS for SB 1135, HCS for SS No. 2 for SB 1233, SB 1408, CCS for SS for SB 1421, HCS for SB 1470, HCS for SB 1544, SS for SB 1553, HCS for SB 1572, SB 1576, and SB 1629, after having been duly signed by the Speaker of the House of Representatives in open session, were delivered to the Governor by the Secretary of the Senate.

COMMUNICATIONS

President Pro Tem O'Laughlin submitted the following:

May 28, 2026

Ms. Kristina Martin
Secretary of the Senate
State Capitol
Jefferson City, MO 65101

Dear Ms. Martin,

Please be advised that I am hereby appointing the Select Committee on Rural Healthcare to consist of the following members:

Senator Jill Carter, Chair
Senator Jason Bean, Vice Chair
Senator Jamie Burger
Senator Patty Lewis
Senator Barbara Washington

The Select Committee on Rural Healthcare shall hear and issue a report on matters related to healthcare challenges and opportunities confronting Missouri's rural communities.

The Committee shall include in its report recommendations on Missouri Law as it relates to hospital sustainability, provider shortages, healthcare accessibility, mental and behavioral health services, telehealth expansion, care delivery models, and geographic and economic barriers facing rural communities.

The Committee shall have authority to form such sub-committees as it deems necessary in furtherance of these goals.

Please do not hesitate to contact me should you need any assistance.

Sincerely,



President Pro Tem

Also,

May 28, 2026

Ms. Kristina Martin
Secretary of the Senate
State Capitol
Jefferson City, MO 65101

Dear Ms. Martin,

Please be advised that I am hereby appointing the Select Committee on Abandoned Landfill Remediation to consist of the following members:

Senator Ben Brown, Chair
Senator Jamie Burger, Vice Chair
Senator Joe Nicola
Senator Tracy McCreery
Senator Angela Mosley

The Select Committee on Abandoned Landfill Remediation shall hear and issue a report on matters related to abandoned landfills and solid waste districts throughout Missouri.

The Committee shall include in its report recommendations on Missouri Law as it relates to solid waste districts efficiency, remediation of abandoned landfills, and ongoing sustainability of waste disposal.

The Committee shall have authority to form such sub-committees as it deems necessary in furtherance of these goals.

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Seventieth Day - Thursday, May 28, 2026

Please do not hesitate to contact me should you need any assistance.

Sincerely,

A handwritten signature in black ink that reads "Cindy O'Laughlin". The signature is written in a cursive style with a large initial "C".

President Pro Tem

On motion of Senator O'Laughlin, the Senate adjourned sine die, pursuant to the Constitution.

DAVID WASINGER

Lieutenant Governor

KRISTINA MARTIN

Secretary of the Senate

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