

Jurisdiction and Venue

18. This Court has subject matter jurisdiction over this action pursuant to Sections 610.027 and 610.030; Missouri Supreme Court Rule 92; and Missouri Constitution Article V, § 14.

19. The City's principal place of business is in Maries County, Missouri.

20. This Court has personal jurisdiction over the City because the City's principal place of business is in Maries County, Missouri.

21. Venue is proper in this Court under Section 610.027.1 as the City's principal place of business is in Carroll County, Missouri.

Allegations Common to All Counts

22. The Missouri Open Meetings Law codifies the State's public policy in favor of and commitment to open and transparent government.

23. The Open Meetings Law is codified at Sections 610.010 to 610.225.

24. The Law provides that "[i]t is the public policy of this state that meetings, records, votes, actions, and deliberations of public governmental bodies be open to the public[.]" § 610.011.1.

25. Pursuant to that clear public policy, "all public meetings of public governmental bodies shall be open to the public . . . and all public votes of public governmental bodies shall be recorded[.]" § 610.011.2.

26. To help carry out this public policy of openness, a public governmental body is required to provide notice to the public of its upcoming meetings. Specifically, "[a]ll public governmental bodies shall give notice of the time, date, and place of each