

47. The Board typically meets on the second Tuesday of each month at 6:30 p.m. However, the Board's July 31, 2023 meeting was captioned a "special meeting."

48. On Friday, July 28, 2023, the City posted a meeting notice indicating that the Board would convene a meeting on July 11, 2023.

49. At about 4:15 p.m. on Monday, July 31, 2023, the City amended that meeting notice to change the date of the meeting from July 11 to July 31, 2023.

50. Members of the public who saw the meeting notice would not have known that the Board was to meet on July 31, as the meeting notice did not have the correct date. And at the time the City did amend the meeting notice to state the correct date, there were approximately two hours before the meeting would occur.

51. The City violated Section 610.020.1 and .2 because it did not provide notice of the time, date, and place of either or both of all three public meetings identified above within 24 hours of the meetings.

52. The City, Mayor White, and the Board have known that public meetings must be posted to the public no sooner than 24 hours in advance of the public meeting.

53. The City exhibited a conscious design, intent, or plan to violate the Open Meetings Law.

54. The City was aware that consequences exist for violating the Open Meetings Law.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff: (a) declaring Defendant violated the Open Meetings Law by failing to comply with notice requirements of § 610.020 in each instance described above; (b)