

order appropriate injunctive relief under § 610.030 to ensure the City complies with the Open Meetings Law’s meeting notice requirements; (c) award \$1,000 in monetary penalties for each knowing violation the Court finds under § 610.027.3; (d) award \$5,000 in monetary penalties for each purposeful violation the Court finds under § 610.027.4; and (e) any such further relief as the Court deems just and appropriate.

COUNT II – Violations of Section 610.020.1 for discussing items of public business not on meeting agendas

55. Plaintiff herein restates and incorporates by reference the allegations contained in all preceding paragraphs of the Petition.

56. Section 610.020.1 requires that public governmental bodies post a “tentative agenda” that is “in a manner reasonably calculated to advise the public of the matters to be considered.”

57. On several occasions throughout 2023, the Board posted a notice of public meeting that included an agenda not reasonably calculated to advise the public of the matters to be considered. In these instances, the agenda lacked reasonable specificity on items that were intended to be discussed in the public meeting. These agenda items did not include all items of public business discussed or voted on by the Board.

58. On or about April 18, 2023, the City posted a meeting notice of a Board meeting to be held on April 24, 2023 at 6:30 p.m. The only agenda item stated “Review Engineer Qualifications for Rock Island Trail.”

59. The Board, in fact, held a meeting on April 24, 2023. That was a “public meeting” as defined in Section 610.010.