

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

105. 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) order appropriate injunctive relief under § 610.030 to ensure the City complies with the Open Meetings Law's meeting minutes 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 IV – Violations of Section 610.022.3**

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

107. Under the Open Meetings Law, “all public meetings of public governmental bodies shall be open to the public” unless specifically exempted by law. § 610.011.1-2.

108. Moreover, any exception to openness must be “strictly construed” to promote that public policy. § 610.011.1.