

109. All public governmental bodies must provide public notice and identify under which exception the meeting may be closed before a closed public meeting occurs. §§ 610.020 to 610.021.

110. The “specific reason announced” for a public governmental body to close a meeting must relate directly to a specific provision in § 610.021, which authorizes, but does not require, a public governmental body to conduct a closed public meeting. § 610.022.3.

111. As a preliminary requirement, the party alleging a violation of Missouri Open Meetings law must show that the body is a “public governmental body” subject to the provisions of Sections 610.010-610.030, and that the body held a closed public meeting.

112. After this showing, the burden shifts to the public governmental body to prove compliance with the statutory requirements of the Open Meetings Law. § 610.027.2.

113. When a public governmental body conducts a closed public meeting, it is the body that must demonstrate that it was in closed session for the specific announced reason authorized by law and that its members did not discuss any business outside the scope of the stated reason for entering the closed public meeting. § 610.027.2.

114. On February 21, 2023, the Board held a “special session” public meeting that included an open session and a closed session. Both sessions were public meetings as defined in Section 610.010.