

115. The Board voted to adjourn the open meeting to closed session “to discuss a counteroffer amount,” as reflected in the meeting minutes.

116. In the closed-session portion of the meeting, the Board discussed the purchase of a K9 police animal from the Maries County Sheriff’s Office. The Board also took a vote to cap a counter-offer at \$3,000.

117. That discussion topic and vote was not authorized to be closed under any subsection of Section 610.021.

118. The Board took a vote to adjourn the meeting to closed session “to discuss a counteroffer amount,” as reflected in the meeting minutes.

119. The City and the Board known that a public meeting can be closed only to the extent authorized by Section 610.021.

120. The Board’s discussion and vote on the K9 dog counteroffer amount violated Section 610.022.3.

121. That discussion and vote are a knowing violation Section 610.022.3.

122. The Board purposefully violated Section 610.022.3 as it knew its Open Meetings Law obligations and the penalties for violating the 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 § 610.022.3 as described above; (b) order appropriate injunctive relief under § 610.030 to ensure the City complies with the Open Meetings Law’s 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