

129. The Board also did not properly identify the subsection of Section 610.021 that would authorize each meeting's closure when taking a vote to close the meeting.

130. To agendas for the Board's meetings do not sufficiently identify the subsection of Section 610.021 that would authorize each meeting's closure.

131. The City, Mayor White, and the Board knew of the proper procedures to close a public meeting under Section 610.022.

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

133. 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 § 610.022.1 as described above; (b) order appropriate injunctive relief under § 610.030 to ensure the City complies with the Open Meetings Law's closed-meeting 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.