

IN THE CIRCUIT COURT OF ST. CHARLES  
STATE OF MISSOURI

SCC PARENTS ASSOCIATION )  
 )  
 )  
Plaintiffs, )  
 )  
 v. )  
 )  
ST. CHARLES COUNTY )  
DEPARTMENT OF PUBLIC )  
HEALTH, )  
 )  
Defendants. )

**PETITION**

1. This action seeks a declaratory judgment pursuant to Section 536.050, RSMo., that Defendant St. Charles County Department of Public Health (“DPH”) implementation and enforcement of quarantine policies, along with embedded masking requirements, at and through schools in St. Charles County are invalid and illegal.

2. This action further seeks a permanent injunction against Defendant implementing and enforcing quarantining policies, with or without masking conditions, at and through schools in St. Charles County without complying with applicable Missouri statutes.

**NATURE OF THE ACTION**

3. Missouri regulations grant local health authorities, like Defendant, broad powers to make orders to limit the spread of diseases. 19 CSR 20-20.040(2)(G).

4. A recently passed Missouri law subjects orders issued by local health authorities, including Defendant’s quarantine order, to procedural requirements and review by local elected governing bodies. § 67.265, RSMo.

5. At no time has Defendant met the requirements of § 67.265, RSMo.,

for enactment of a valid quarantine order. Missouri's Sunshine Law, § 610.010 *et seq.*, RSMo., requires public governmental bodies such as the Defendant, to hold all meetings discussing public matters open to the public.

6. Defendant had not invited the public to any meetings in the course of implementing its quarantine orders, thus no quarantine order has satisfied the requirements under the Missouri Sunshine Law.

7. Without a valid order in place, Defendant has implemented quarantine policies and encouraged and supported enforcement of those orders by the school districts, school administrators and school medical personnel.

8. Following and citing orders or recommendations from the Defendant, school administrators and school medical personnel in St. Charles County have sent healthy children home from school with mandatory quarantine orders banning them from school for a period of days.

9. Department of Education ("DESE") has stated that Local Public Health Associations have the authority to quarantine within their jurisdiction, including children in schools.

10. Schools issue students quarantine orders in the name of the Defendant, imposing the terms of quarantine dictated by the Defendant.

11. Parents have a property right to free education for their children. The Missouri Constitution requires due process before the State revokes a parent's right to education for their children. *State ex rel. Yarber v. McHenry*, 915 S.W.2d 325, 328 (Mo. 1995). Defendant's actions have deprived parents of their right to their children's public education without due process of law.

12. Schools are expressive associations with the right to assemble under the Missouri Constitution. Mo. Const. art. I, § 9; *Boy Scouts of America v. Dale*, 530 U.S. 640, 651 (2000); *Roberts v. U.S. Jaycees*, 468 U.S. 609, 622 (1984).

13. Schools' and parents' rights to assemble are significantly affected by any policy dictating who can and cannot attend school, so any such policy must be the least restrictive means of serving a compelling state interest. *Christian Legal Society v. Walker*, 453 F.3d 853, 862-63 (7th Cir. 2006). Defendant's quarantine policies do not meet this standard.

14. Thus, Defendant's actions in privately devising, disseminating, implementing, and enforcing, without following the procedures for making valid orders set forth under Missouri law, quarantine policies, including embedded masking conditions, that have the force of law and the effect of healthy children being sent home from school against the will of their parents thus have violated and are violating on a continuing basis: § 67.265.1, RSMo., § 610.010 *et seq.*, RSMo., and the Rights to Assembly, Expressive Association and Due Process guaranteed by the Missouri Constitution.

#### **JURISDICTION AND VENUE**

15. This Court has jurisdiction under Section 536.050, RSMo., because Plaintiffs seek a declaratory judgment regarding the validity of rules and threatened applications of rules issued by Defendant, a state agency.

16. This court has jurisdiction to award reasonable fees and expenses under Section 536.050.3, RSMo.

17. This Court has jurisdiction under Section 610.027, RSMo., because Plaintiffs seek judicial enforcement of Missouri's Sunshine Law, § 610.010 *et seq.*, RSMo.

18. This Court has jurisdiction under Section 610.027.5 to declare void any action of Defendant that violates Missouri's Sunshine Law, Section 610.010 *et seq.*, RSMo.

19. This Court has jurisdiction under Sections 610.027.3 & 610.027.4 to award civil penalties as well as all costs and reasonable attorney fees for knowing and purposeful violations of Missouri's Sunshine Law, § 610.010 *et seq.*, RSMo.

20. Venue is proper in this Court under Section 536.050, RSMo., because Plaintiffs are residents of St. Charles County and thus permitted to challenge agency rules and regulations in their county of residence.

21. Venue is also proper in this Court under Section 610.027.1, RSMo., because Defendant's principal place of business is in St. Charles County.

### **PARTIES**

22. Plaintiff, SCC Parents Association ("SCCPA"), is a Missouri nonprofit corporation with its principal place of business in St. Charles County Missouri. See Affidavit 2, attached.

23. Plaintiff SCCPA is made up of hundreds of parents, guardians, families and taxpayers in St. Charles County, Missouri who advocate for the health, social, emotional, and academic wellbeing of students in the St. Charles County area.

24. Defendant, St. Charles County Public Health Department ("PHD") is a local healthy authority within the meaning of 67.265(1), RSMo., located in St. Charles County, Missouri and is responsible for St. Charles County, Missouri.

25. Plaintiff SCCPA has one or more members whose children are currently enrolled in public schools in St. Charles County.

26. Plaintiff SCCPA has one or more members whose children have been

adversely affected and deprived their right to free education due to Defendant's quarantine orders.

27. Plaintiff member, Jimmy and Jennifer Zoellner, have a daughter, MZ, enrolled at Francis Howell Central. *See* Affidavit 1

28. MZ was quarantined due to alleged exposure from another student testing positive for COVID19. *Id.*

29. MZ was unable to attend school functions and was also forced to do virtual learning, making it difficult for her to keep up with schoolwork due and utilize the accommodations she is entitled to from her Individual Education Program (IEP). *Id.*

30. Plaintiff member, Lindsey Stipes, has a son, CS, who is enrolled in St. Charles County schools. *See* Affidavit 2

31. CS was quarantined twice due to two instances in which CS had been exposed to COVID19. *Id.*

32. CS never tested positive for COVID19, never had any symptoms of COVID19, and was forced to miss fourteen school days due to quarantine recommendations of the Defendant. *Id.*

33. Plaintiff member, Candice Doerr, has a son, BD, that is enrolled in St. Charles County schools. *See* Affidavit 3

34. BD was quarantined after being allegedly exposed to COVID19. *Id.*

35. BD never expressed any symptoms of COVID19 throughout the duration of his quarantine. *Id.*

36. BD was denied the opportunity for in-person learning and experienced emotional distress from the toll of being under quarantine. *Id.*

37. Plaintiff member, Lindi Williford, has a child, LC, enrolled in St. Charles County Schools. *See* Affidavit 4

38. LC was quarantined four times due to alleged COVID19 exposures. *Id.*

39. LC was denied the opportunity for in-person learning and participation in school functions. *Id.*

40. Plaintiff member, Haylee Hercules, has a daughter, CH, who is enrolled in St. Charles County schools with an IEP. *See* Affidavit 5

41. CH was exposed to COVID19. *Id.*

42. CH had never exhibited any symptoms, nor tested positive for COVID19. *Id.*

43. CH was forced to miss in-person learning until providing a negative COVID19 test. *Id.*

44. Plaintiff member, Sarah Fuller has a Kindergartener, 1st Grader in St. Charles County schools. *See* Affidavit 6

45. Both the Kindergartener and 1st Grader were forced to wear masks in the schools. *Id.*

46. Both the Kindergartener and 1st Grader had to be removed from in-person learning due to them suffering from extensive exhaustion and face rashes. *Id.*

47. Plaintiff member, Sarah Fuller, has a son, JF, enrolled in Francis Howell North. *Id.*

48. JF was forced to quarantine due to COVID19 exposure. *Id.*

49. JF, at no point, exhibited any symptoms of COVID19 during the course of his quarantine. *Id.*

50. JF was denied the opportunity for in-person learning as a result of the quarantine. *Id.*

51. Plaintiff member, Amber Crawford, has a daughter, LC, enrolled in St. Charles County schools. *See* Affidavit 7

52. LC was removed from class due to alleged COVID19 exposure and forced to quarantine for 14 calendar days. *Id.*

53. LC did not exhibit any symptoms throughout the duration of her quarantine. *Id.*

54. LC was denied in-person learning opportunities with no virtual lectures. *Id.*

55. Plaintiff member, Amber Crawford, has a son, LC, enrolled in St Charles County schools. *Id.*

56. LC was removed from class due to alleged COVID19 exposure and forced to quarantine for 14 calendar days. *Id.*

57. LC never exhibited any symptoms of COVID19 throughout the quarantine. *Id.*

58. LC was denied the opportunity for in-person learning with no virtual lectures or learning aside from homework. *Id.*

59. Plaintiff member, Cory Light, has a daughter, NL, enrolled in St. Charles County schools. *See* Affidavit 8

60. NL was exposed to COVID19 and forced to quarantine for 14 days. *Id.*

61. In order for her to return to school, NL had to remain symptom free and agree to wear a mask consistently. *Id.*

62. Plaintiff member, Melanie Risch, has a son, TR, enrolled in St. Charles county schools, who is also hearing impaired. *See Affidavit 9*

63. Melanie Risch was given the option for in-person or virtual learning for TR. She chose in-person learning for TR due to his hearing impairment and the fact that the school he would be attending said that masks were optional. *Id.*

64. Two months after starting school, the school made masks mandatory, with no option provided for virtual learning. *Id.*

65. Melanie Risch asked the school to address the mask requirement in terms of TR's hearing impairment, to which the school blatantly ignored her request. *Id.*

66. Due to mask mandates, TR's learning opportunities were greatly impaired. *Id.*

67. Plaintiff member, Denise McConachie, has a daughter, AM, enrolled in Holt High School. *See Affidavit 10*

68. AM has been quarantined four times between 2020 and 2021. *Id.*

69. As a result of the quarantines, AM has been denied the opportunity for in-person learning, forced to educate herself on required school topic without access to virtual lectures and miss out on various school functions. This has caused her to suffer through depression, food deprivation, and extreme stress. *Id.*

70. Plaintiff member, Kammie Williams, has a daughter, HW, enrolled in St. Charles county schools. *See Affidavit 11*

71. HW was allegedly exposed to COVID19 by another student. *Id.*

72. HW was quarantined for two weeks, never showing any symptoms. *Id.*

### **FACTUAL ALLEGATIONS**



73. Defendant St. Charles County Department of Public Health (“DPH”) has not validly promulgated any orders imposing quarantine practices in the schools of St. Charles County.

74. Defendant has previously issued health orders in response to Covid-19. <sup>1</sup>

75. Since August 2020, DPH has issued orders requiring mandatory quarantines for people, including children, who test positive for COVID19, or have been in close contact with or are in a household contact with a positive COVID19 patient. *See* Exhibit C

76. Without conducting any public meetings or hearings, DPH enacted a new set of recommendations for the 2021-22 school year in August 2021, including new versions of the masks and quarantine rules and orders. *See* Exhibits B & C

77. Again without any public engagement, DPH issued updated quarantine orders specific to schools on October 7, 2021 via posting on their website and meeting with the school district superintendents.<sup>2</sup> *See* Exhibits B & C

78. DPH uses school personnel to assist in their contract tracing. *See* Exhibits B

79. DPH intended its quarantines to be mandatory and enforced throughout the county. *See* Exhibit C.

80. DPH continuously met with superintendents to discuss quarantine procedures and mandates. *See* Exhibit H.

81. DPH modifies its quarantine order from time to time via press release, email campaign, and updates to its website. *See* Exhibits B & G

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1. <https://www.sccmo.org/2111/COVID-19-Latest-News>

2 <https://www.sccmo.org/DocumentCenter/View/17838/School-Recommendations-2021-2022updated1007202>

82. Each order is very specific, with rules, release dates, and guidelines for when a child is permitted to return to school. *See* Exhibit B

83. The quarantine forms sent home with parents provide that instructions are to come from DPH and that quarantines are ordered via DPH. *See* Exhibit A.

84. Schools issue quarantine orders under the guidance of DPH to the families and individualized by school employees to comply with DPH's orders as well as submit additional information in order to determine if students meet the criteria for returning to school. *See* Exhibits A & E.

85. Under DPH's quarantine orders, at least **10,398 individual quarantines were imposed on St. Charles County public school children since June 15, 2021,** which represents approximately 145,572 school days missed by St. Charles County children in only five months. *See* Exhibit D.

86. Plaintiffs are being irreparably harmed by Defendant's actions and have no adequate remedy at law. An injunction to refrain from violating the Constitution, is now and always, in the public interest.

**COUNT ONE – DECLARATION THAT DEFENDANT'S QUARANTINE ORDERS ARE INVALID FOR FAILURE TO COMPLY WITH MISSOURI'S SUNSHINE LAW**

87. Plaintiffs incorporate by reference the allegations in all preceding paragraphs.

88. Plaintiffs seek a declaration that Defendant's quarantine orders, which it has implemented and enforced in county schools and school districts, are invalid because, in passing them, Defendant has violated the "open meeting" requirement of Missouri's Sunshine Law, § 610.010 *et seq.*, RSMo.

89. Defendant is a "public governmental body" within the meaning of Section

610.010(4), RSMo. *See Trib. Pub. Co. v. Curators of Univ. of Missouri*, 661 S.W.2d 575, 584 (Mo. App. W.D. 1983).

90. Any meeting of a “public governmental body,” such as Defendant, at which public business is discussed, is a “public meeting” and must be open to the public. § 610.011, RSMo.; *see also, e.g., MacLachlan v. McNary*, 684 S.W.2d 534, 539 (Mo. Ct. App. 1984).

91. Defendant held no public meetings in the course of developing or enacting any quarantine order or recommendations which were imposed on St. Charles County Schools.

92. On information and belief, Defendant held closed meetings and/or votes in order to arrive at its quarantine recommendations and plan for their implementation. *See Exhibits B & G.*

93. Any quarantine order Defendant has implemented or enforced in St. Charles County schools is illegal and invalid because, in enacting it, Defendant violated Missouri’s Sunshine Law. § 610.010 *et seq.*, RSMo.

94. Moreover, Defendant’s violations of Missouri’s Sunshine Law were knowing and/or purposeful, in violation of Sections 610.027.3 & 610.027.4, RSMo. Defendant was well aware of the Sunshine Law’s open meetings requirements but intentionally avoided such meetings because of the uproar Defendant’s proposed orders would cause if they were widely known. Because Defendant’s violations were therefore knowing and purposeful, Defendant is liable for civil penalties for its violations of Missouri’s Sunshine Law.

**COUNT TWO -- DECLARATION THAT QUARANTINE ORDERS ARE  
SUBJECT TO § 67.265.1, RSMo.**

95. Plaintiffs incorporate by reference the allegations in all preceding paragraphs.

96. Plaintiffs seek a declaration that all quarantine orders issued by Defendant are and have been subject to the requirements of Section 67.265.1, RSMo.

97. Section 67.265.1(1) mandates that all orders issued “during and related to an emergency declared pursuant to chapter 44” that “place[] restrictions on the opening of or access to any one or more . . . schools” expire after 30 days unless approved and extended by the political subdivision’s governing body.

98. Section 67.265.1(2) mandates that any order of general applicability issued outside an emergency that “directly or indirectly closes an entire classification of . . . schools” expire after 21 days unless approved and extended by the political subdivision’s governing body.

99. On March 23, 2020, DPH and County Executive Steve Ehlmann jointly imposed a quarantine order during a state of emergency declared pursuant to chapter 44.

100. That order was amended several times.

101. DPH again imposed a modified quarantine order during a state of emergency pursuant to chapter 44 on November 24, 2020.<sup>3</sup>

102. Defendant issued the current quarantine order March 11, 2021.<sup>4</sup>

103. The underlying emergency order issued by the Governor was revoked on August 27, 2021.<sup>5</sup>

104. Defendant purported to “update” said quarantine order effective October 7, 2021.<sup>6</sup> *See* Exhibits B & G.

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<sup>3</sup> <https://www.sccmo.org/ArchiveCenter/ViewFile/Item/4440>

<sup>4</sup> <https://www.sccmo.org/2136/COVID-19-Quarantine-Information>

<sup>5</sup> <https://governor.mo.gov/press-releases/archive/governor-parson-ends-existing-state-emergency-terminating-executive-order-20>

<sup>6</sup> <https://www.sccmo.org/DocumentCenter/View/17838/School-Recommendations-2021-2022updated10072021>

105. All quarantine orders issued prior to August 27, 2021, when the governor revoked his emergency order, “restrict[ed] access to” more than one school, and therefore should have expired after 30 days unless approved or extended by a vote of the Board of the St. Charles County Health Department or St. Charles County Council. § 67.265.1(1), RSMo.

106. Accordingly, any quarantine order should have expired without approval or extension by a vote of the Board of the St. Charles County Health Department or St. Charles County Council. § 67.265.1(1), RSMo.

107. Rather than gain the approval and extension required by Section 67.265(1), on October 7, 2021, Defendant “updated” its quarantine order. *See supra* note <sup>6</sup>.

108. Defendant’s “update” of the quarantine order on the day it was set to expire was an outright evasion of the requirements of Section 67.265.

109. Treating this October 7, 2021, “update” as a new order would place the new order under Section 67.265.1(2), because it issued after the revocation of the governor’s emergency order.

110. By requiring all schools to send their students home under varying conditions, and by “indirectly closing” schools differentially based on whether they have masking policies in place, Defendant’s October 7, 2021, “updated” quarantine order, like all quarantine orders, indirectly closes entire classifications of schools, at least the classification of schools with no masking policies, who are required to quarantine entire classes and larger groups of students within the meaning of Section 67.265.1(2), RSMo.

111. Therefore, under the terms of Section 67.265.1(2), RSMo., Defendant’s October 7, 2021, quarantine order, if it is a new order, automatically expires after 21 days

unless approved or extended by a vote of the Board of the St. Charles County Health Department or St. Charles County Council. § 67.265.1(2), RSMo.

112. Plaintiffs therefore seek a declaration that quarantine orders are subject to Section 67.265.1, RSMo.

113. Plaintiffs further seek a declaration that Defendant's current quarantine order, an "update" imposed October 7, 2021, is either (1) illegal as an invalid extension of an earlier order without the required approval of the Board of the St. Charles County Health Department or St. Charles County Council, under the terms of Section 67.265.1(1), or (2) shall expire as October 28, 2021, under the terms of 67.265.1(2), RSMo.

**COUNT THREE – DECLARATION THAT DEFENDANT'S QUARANTINE ORDERS ARE NOT IN EFFECT PER § 67.265.4, RSMo.**

114. Plaintiffs incorporate by reference the allegations in all preceding paragraphs.

115. As discussed above in Count Two, quarantine orders are subject to Section 67.265, RSMo.

116. Plaintiffs also seek a declaration that the Defendant has no quarantine order in effect, and those it has disseminated and attempted to enforce are not in effect, per the terms of Section 67.265.4, RSMo.

117. Specifically, under Section 67.265.4, RSMo., "the health officer, local public health agency, public health authority, or executive shall provide a report to the governing body containing information supporting the need for such order."

118. On information and belief, Defendant has provided no report or information supporting the need for a quarantine order to the Board of the St. Charles County Health Department or St. Charles County Council.

119. As a result, Defendant has in place no legal quarantine order, as that

information must be provided “[p]rior to or concurrent with” the issuance of any order subject to Section 67.265.1, RSMo.

**COUNT FOUR – DECLARATION THAT DEFENDANT’S ISSUANCE OF QUARANTINE ORDERS WITHOUT LEGAL AUTHORITY VIOLATES THE MISSOURI CONSTITUTION BY DEPRIVING PARENTS OF PROPERTY INTERESTS WITHOUT DUE PROCESS OF LAW**

120. Plaintiffs incorporate by reference the allegations in all preceding paragraphs.

121. Plaintiffs also seek a declaration that Defendant’s issuance of quarantine orders without legal authority is invalid because it violates the Due Process Clause of the Missouri Constitution.

122. “Missouri statutes establish a property interest in an education…….” *State ex rel. Yarber v. McHenry*, 915 S.W.2d 325, 328 (Mo. 1995).

123. The Due Process Clause of the Missouri Constitution guarantees that “[n]o person shall be deprived of life, liberty, or property without due process of law.” MO. CONST. art. I s. 10.

124. The Missouri Constitution therefore requires due process before a school or school district can deprive a student of an education for even a de minimis length of time. *See McHenry*, 915 S.W.2d at 328.

125. Defendant’s illegal quarantine orders refuse education to healthy children without any process at all. *See Exhibits A & F*.

126. Defendant’s issuance of quarantine orders without valid legal authorization therefore violates Article I, Section 10, of the Missouri Constitution.

**COUNT FIVE – DECLARATION THAT DEFENDANT’S ISSUANCE OF QUARANTINE ORDERS VIOLATES THE MISSOURI CONSTITUTION BY BURDENING SCHOOLS’ RIGHTS PEACEABLY TO ASSEMBLE FOR THE COMMON GOOD**

127. Plaintiffs incorporate by reference the allegations in all preceding paragraphs.
128. Plaintiffs also seek a declaration that Defendant's quarantine orders violate the

Missouri Constitution by depriving schools of their right peaceably to assemble for the common good.

129. The Missouri Constitution guarantees citizens "the right peaceably to assemble for the common good." MO. CONST., art. I, s. 9.

130. Missouri courts treat the scope of the freedom of association under the Missouri Constitution as "coterminous" with the right guaranteed under the U.S. Constitution. *Grover v. City of Springfield*, No. 15261, 1988 WL 122284, at \*4 (Mo. App. S.D. Nov. 17, 1988) (citations omitted).

131. The Missouri Constitution therefore protects a "right to associate with others in pursuit of a wide variety of political, social, economic, educational, religious, and cultural ends." *Roberts v. U.S. Jaycees*, 468 U.S. 609, 622 (1984).

132. Schools are expressive associations because they are private or public groups that join together to "transmit . . . a system of values." *Boy Scouts of America v. Dale*, 530 U.S. 640, 651 (2000).

133. Forced exclusion of members of an expressive association by mandatory quarantine orders significantly affects the association's expression by burdening its right to define its own membership. *Dale*, 530 U.S. at 656; *Christian Legal Society v. Walker*, 453 F.3d 853, 862-63 (7th Cir. 2006) (forced membership decisions have significant effect on expression of Christian student organization). "Protection of the association's right to define its membership derives from the recognition that the formation of an expressive association is the creation of a voice, and the selection of members is the definition of that voice." *Roberts v. U.S. Jaycees*, 468 U.S. 609, 633 (1984).



134. Defendant's quarantine order forcing schools to remove healthy children from their expressive community for significant periods of time significantly affects the right of assembly of schools and their members (students and parents).

135. Because it significantly affects Plaintiffs' rights peaceably to assemble for the common good, Defendant's quarantine order is illegal unless it "serves a compelling state interest that is not related to the suppression of ideas and that cannot be achieved through a less restrictive means." *Walker*, 453 F.3d at 863 (citing *Dale*).

136. Defendant has not shown and cannot show that its quarantine order serves a compelling state interest by the least restrictive means.

137. Defendant's quarantine order therefore violates Article I, section 9, of the Missouri Constitution by depriving Plaintiff of their "right peaceably to assemble for the common good."

### **CONCLUSION**

WHEREFORE, Plaintiffs respectfully request that this Court:

1. Declare that Defendant's quarantine orders, including embedded masking conditions, are invalid and unlawful because of Defendant's failure to comply with Missouri's Sunshine Law (Count One);

2. Declare that all Defendant's quarantine orders are subject to Section 67.265, RSMo., and that that Section provides that the October 7, 2021, "update" to an earlier order either (1) was illegal and ineffective for failure to satisfy the requirements of Section 67.265.1(1), or (2) if initially valid, automatically expires on October 28, 2021 (Count Two); declare that there is no quarantine order in effect in St. Charles County under Section 67.265.4,

RSMo. (Count Three);

3. Declare that Defendant's actions implementing unlawful quarantine orders, including embedded mask conditions, are unconstitutional under the Missouri Constitution (Counts Four and Five);

4. Grant relief by permanent injunction, certiorari, mandamus, prohibition, or other appropriate action, including by temporary restraining order and preliminary injunction, providing that Defendant cease all actions imposing, implementing, or enforcing quarantine orders, including embedded mask conditions, unless and until such order satisfies the requirements imposed on health orders by Section 67.265, RSMo., and those applicable to all Missouri laws set forth in Section 610.010 *et seq.*, RSMo.;

5. Enter a final judgment in Plaintiffs' favor on all Counts in this Petition;

6. Enter a final judgment awarding Plaintiffs civil penalties for Defendant's knowing and/or purposeful violation of Missouri's Sunshine Law as provided by Sections 610.027.3 & 610.027.4, RSMo.;

7. Enter a final judgment awarding Plaintiffs reasonable fees and expenses as provided by Section 536.050.3, RSMo. or any other law allowing fees and expenses;

8. Enter a final judgment awarding Plaintiffs all costs and reasonable attorney fees as provided by 610.027.3 & 610.027.4, RSMo.; and

9. Grant such other and further relief as the Court deems just and proper under the circumstances.

Dated: October \_\_\_, 2021

Respectfully submitted,

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