

**IN THE 22ND JUDICIAL CIRCUIT COURT
CITY OF ST. LOUIS
STATE OF MISSOURI**

| | | |
|------------------------------|---|-----|
| Robert Childs, |) | |
| |) | |
| and |) | |
| |) | |
| Elad Gross, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | No. |
| |) | |
| City of St. Louis, |) | |
| |) | |
| Joseph Sims, |) | |
| |) | |
| Sheena Hamilton, |) | |
| |) | |
| Tishaura Jones, |) | |
| |) | |
| Custodian of Records for the |) | |
| St. Louis City Division of |) | |
| Corrections, |) | |
| |) | |
| and |) | |
| |) | |
| Custodian of Records for the |) | |
| St. Louis City Department of |) | |
| Public Safety, |) | |
| |) | |
| |) | |
| Defendants. |) | |

PETITION

COMES NOW Plaintiffs Robert Childs and Elad Gross and for their
Petition against Defendants City of St. Louis, Joseph Sims, Sheena Hamilton,

Tishaura Jones, the Custodian of Records for the St. Louis City Division of Corrections, and the Custodian of Records for the St. Louis City Department of Safety for violations of the Missouri Sunshine Law state to the Court as follows:

INTRODUCTION

Defendants have repeatedly, knowingly, and purposely violated Missouri's Sunshine Law, delayed producing public records, charged unsupported fees for access to public records, refused to correct their behavior when warned multiple times, and continue to illegally delay production of public records. These violations are part of a pattern of Defendants ignoring the requirements of Missouri's Sunshine Law, and Plaintiffs ask the Court to penalize Defendants for their illegal behavior and immediately intervene to put an end to these abuses.

PARTIES

1. Plaintiff Childs is now and, at all times relevant to this lawsuit, was a resident of the State of Missouri.
2. Plaintiff Gross is now and, at all times relevant to this lawsuit, was a resident of the State of Missouri.
3. Defendant City of St. Louis is now and, at all times relevant to this lawsuit, was a municipal entity located in Missouri.
4. Defendant Sims is now and, at all times relevant to this lawsuit,

was the Sunshine Law Coordinator for the St. Louis City Counselor's Office, with the St. Louis City Counselor's Office's principal place of business located in St. Louis City, State of Missouri. Defendant Sims is sued in his official and individual capacities.

5. Defendant Hamilton is now and, at all times relevant to this lawsuit, was the City Counselor for the City of St. Louis, with the St. Louis City Counselor's Office's principal place of business located in St. Louis City, State of Missouri. Defendant Hamilton is sued in her official and individual capacities.
6. Defendant Jones is now and, at all times relevant to this lawsuit, was the Mayor of the City of St. Louis. Defendant Jones is sued in her official capacity.
7. Defendant Custodian of Records for the St. Louis City Division of Corrections is now and, at all times relevant to this lawsuit, was the custodian of records of the City of St. Louis Division of Corrections. Defendant Custodian of Records for the St. Louis City Division of Corrections is sued in their official and individual capacities.
8. Defendant Custodian of Records for the St. Louis City Department of Public Safety is now and, at all times relevant to

this lawsuit, was the custodian of records of the City of St. Louis Department of Public Safety. Defendant Custodian of Records for the St. Louis City Department of Public Safety is sued in their official and individual capacities.

JURISDICTION AND VENUE

9. This Petition is filed pursuant to the Missouri Sunshine Law, Missouri Revised Statutes Chapter 610.
10. Defendants' principal place of business is located in St. Louis City, State of Missouri.
11. The City of St. Louis is a public governmental body as defined under RSMo. § 610.010.
12. The 22nd Judicial Circuit Court has jurisdiction over this matter as granted by RSMo. § 610.027.
13. The 22nd Judicial Circuit Court has jurisdiction to issue injunctions to enforce the Missouri Sunshine Law as granted by RSMo. § 610.030.
14. Venue is therefore appropriate in the 22nd Judicial Circuit Court.

FACTS

First Sunshine Request

15. On September 28, 2021, Plaintiffs sent Defendant Custodian of

Records of Corrections four Sunshine Requests outlined in one document seeking public records related to dangerous conditions at the St. Louis City Justice Center, including failing cell locks and other conditions that directly led to an assault on Plaintiff Childs and serious physical injury while he was detained at the St. Louis City Justice Center. (First Sunshine Request, Ex. 1). Plaintiffs additionally uploaded their First Sunshine Request via the City of St. Louis's online Public Records Center. Defendants designated the First Sunshine Request as Request R001608.

16. On October 1, 2021, Defendant Sims, the Sunshine Law Coordinator at the St. Louis City Counselor's Office, responded to Plaintiffs' First Sunshine Request. (Defendants' Response to First Sunshine Request, Ex. 2). Despite the detail included in Plaintiffs' First Sunshine Request, Defendant Sims stated that, "The Custodian of Records for the Corrections Division is unable to reasonably ascertain the specific records for which you are requesting a copy be furnished to you." *Id.* Defendant Sims requested "further details to clarify" Plaintiffs' request. *Id.*
17. No clarification was required for Defendants to fulfill Plaintiffs' Sunshine Request.
18. On October 6, 2021, Plaintiff Gross replied to Defendant Sims'

correspondence from October 1, reiterated his Sunshine Requests, and attempted to provide clarification despite his Sunshine Requests already being clear. (Plaintiffs' Reply to First Sunshine Request, Ex. 3).

19. On October 6, 2021, Defendant Sims responded to Plaintiffs' reply and again stated that Plaintiffs needed to provide Defendant Sims with "the email addresses or employee names of accounts you wish to have searched, and the specific search terms you wish to target your search by." (Ex. 2.)
20. On October 8, 2021, Plaintiffs submitted ten Sunshine Requests, each separated individually into its own document. (Plaintiffs Second through Eleventh Sunshine Requests, Ex. 4-13). The ten Sunshine Requests consisted of two identical sets of five requests sent both to the Custodians of Records Defendants and uploaded to the Public Records Center portal. All requests asked for the records to be provided in their native electronic format along with any associated metadata.
21. Plaintiffs' First, Second, Third, Fourth, Fifth, and Sixth Sunshine Requests were sent to Defendant Custodian of Records of the Division of Corrections by email directly in addition to Plaintiff Gross uploading the requests through the City of St. Louis's

Online Public Records Center.

22. Plaintiffs' Seventh, Eighth, Ninth, Tenth, and Eleventh Sunshine Requests were sent to Defendant Custodian of Records of the Department of Public Safety by email directly in addition to Plaintiff Gross uploading the requests through the City of St. Louis's Online Public Records Center.
23. The Custodian of Records Defendants have never responded to Plaintiffs. All responses have been sent by Defendant Sims through the Online Public Records Center.

Second Sunshine Request

24. On October 13, 2021, Defendant Sims responded to Plaintiffs' Second Sunshine Request, which Defendants designated as Request R001664. (Defendants' Response to Second Sunshine Request, Ex. 14). Defendant Sims stated that the custodian of records "advised that additional time is necessary" to fulfill Plaintiffs' request and provided an earliest date and time for production to be "the close of business on November 30, 2021." *Id.*
25. On November 30, 2021, Defendants did not produce records in response to Plaintiffs' Second Sunshine Request. Instead, Defendant Sims wrote to Plaintiffs and stated that the custodian of records "has again advised that additional time is necessary" to

complete the request, this time providing an earliest date and time for production to be “the close of business on January 13, 2022.” *Id.*

26. On January 13, 2022, Defendants again did not produce records in response to Plaintiffs’ Second Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to February 16, 2022. *Id.*

Third Sunshine Request

27. On October 13, 2021, Defendant Sims responded to Plaintiffs’ Third Sunshine Request, which Defendants designated as Request R001665. (Defendants’ Response to Third Sunshine Request, Ex. 15). Defendant Sims stated that the custodian of records “advised that additional time is necessary” to fulfill Plaintiffs’ request and provided an earliest date and time for production to be “the close of business on December 1, 2021.” *Id.*
28. On December 1, 2021, Defendants did not produce records in response to Plaintiffs’ Third Sunshine Request. Instead, Defendant Sims wrote to Plaintiffs and stated that the custodian of records “has again advised that additional time is necessary” to complete the request, this time providing an earliest date and time for production to be “the close of business on January 13,

2022.” *Id.*

29. On January 13, 2022, Defendants again did not produce records in response to Plaintiffs’ Third Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to February 17, 2022. *Id.*
30. On February 17, 2022, Defendants again did not produce records in response to Plaintiffs’ Third Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to March 24, 2022. *Id.*
31. On March 24, 2022, Defendant Sims informed Plaintiffs that the custodian of records determined that there were no records responsive to Plaintiffs’ Sunshine Request. *Id.*

Fourth Sunshine Request

32. On October 13, 2021, Defendant Sims responded to Plaintiffs’ Fourth Sunshine Request, which Defendants designated as Request R001666. (Defendants’ Response to Fourth Sunshine Request, Ex. 16). Plaintiffs asked for video of assaults at the St. Louis City Justice Center that had already been provided to the media. Defendant Sims stated that the custodian of records “advised that additional time is necessary” to fulfill Plaintiffs’ request and provided an earliest date and time for production to

be “the close of business on November 1, 2021.” *Id.*

33. On November 1, 2021, Defendants did not produce records in response to Plaintiffs’ Fourth Sunshine Request. Instead, Defendant Sims wrote to Plaintiffs and stated that the custodian of records “needs to know if there is a certain area of the institution [St. Louis City Justice Center] from which you are requesting videos....” *Id.*
34. No clarification was needed for Defendants to fulfill Plaintiffs’ request.
35. On November 19, 2021, Plaintiffs responded to Defendant Sims and limited the search for video to a specific floor in the City jail. *Id.*
36. On December 9, 2021, Defendant Sims stated that “due to a system error,” Defendants’ response to Plaintiffs was not sent. Defendant Sims stated that the earliest date and time at which records would be available would be “the close of business on December 31, 2021.” *Id.*
37. On December 17, 2021, Defendant Sims stated that the custodian of records had “determined that records responsive to your request are already available in the Public Records Archive.” *Id.* Defendant Sims provided a link to those records. *Id.*

Fifth Sunshine Request

38. On October 13, 2021, Defendant Sims responded to Plaintiffs' Fifth Sunshine Request, which Defendants designated as Request R001667. (Defendants' Response to Fifth Sunshine Request, Ex. 17). Defendant Sims stated that the custodian of records "advised that additional time is necessary" to fulfill Plaintiffs' request and provided an earliest date and time for production to be "the close of business on December 1, 2021." *Id.*
39. On December 1, 2021, Defendants did not produce records in response to Plaintiffs' Fifth Sunshine Request. Instead, Defendant Sims wrote to Plaintiffs and stated that the custodian of records "has again advised that additional time is necessary" to complete the request, this time providing an earliest date and time for production to be "the close of business on January 14, 2022." *Id.*
40. On January 14, 2022, Defendants again did not produce records in response to Plaintiffs' Fifth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to February 25, 2022. *Id.*
41. On January 19, 2022, Defendant Sims wrote to Plaintiffs to inform them of "fees accrued and fees that will be accrued for

providing access and furnishing copies of records responsive to your request.” *Id.* Defendant Sims stated that a Technical Support Specialist identified 1,288 potentially responsive emails after working for 0.75 hours. *Id.* Those emails were “in pst format.” *Id.* Defendant Sims stated that he would need to convert those emails from pst format into PDF files, that such a process would take him approximately four hours, and that Plaintiffs would be charged for those four hours of work at a rate of \$17.50 per hour. *Id.*

42. Multiple software services are able to convert thousands of pst documents into PDF documents within minutes.
43. Plaintiffs requested all records be provided in their native format along with their associated metadata.

Sixth Sunshine Request

44. On October 13, 2021, Defendant Sims responded to Plaintiffs’ Sixth Sunshine Request, which Defendants designated as Request R001668. (Defendants’ Response to Sixth Sunshine Request, Ex. 18). Defendant Sims stated that the custodian of records “advised that additional time is necessary” to fulfill Plaintiffs’ request and provided an earliest date and time for production to be “the close of business on November 30, 2021.” *Id.*

45. On November 30, 2021, Defendants did not produce records in response to Plaintiffs' Sixth Sunshine Request. Instead, Defendant Sims wrote to Plaintiffs and stated that the custodian of records "has again advised that additional time is necessary" to complete the request, this time providing an earliest date and time for production to be "the close of business on January 14, 2022." *Id.*
46. On January 14, 2022, Defendant Sims stated that the custodian of records determined that there are no responsive records to Plaintiffs' Sixth Sunshine Request. *Id.*

Seventh Sunshine Request

47. On October 13, 2021, Defendant Sims responded to Plaintiffs' Seventh Sunshine Request, which Defendants designated as Request R001669. (Defendants' Response to Seventh Sunshine Request, Ex. 19). Defendant Sims stated that the custodian of records "advised that additional time is necessary" to fulfill Plaintiffs' request and provided an earliest date and time for production to be "the close of business on November 29, 2021." *Id.*
48. On November 29, 2021, Defendants did not produce records in response to Plaintiffs' Seventh Sunshine Request. Instead, Defendant Sims wrote to Plaintiffs and stated that the custodian

of records “has again advised that additional time is necessary” to complete the request, this time providing an earliest date and time for production to be “the close of business on December 29, 2021.” *Id.*

49. On December 2, 2021, Defendant Sims stated that the custodian of records determined that there are no responsive records to Plaintiffs’ Seventh Sunshine Request. *Id.*

Eighth Sunshine Request

50. On October 13, 2021, Defendant Sims responded to Plaintiffs’ Eighth Sunshine Request, which Defendants designated as Request R001670. (Defendants’ Response to Eighth Sunshine Request, Ex. 20). Defendant Sims stated that the custodian of records “advised that additional time is necessary” to fulfill Plaintiffs’ request and provided an earliest date and time for production to be “the close of business on November 22, 2021.” *Id.*
51. On November 22, 2021, Defendants did not produce records in response to Plaintiffs’ Eighth Sunshine Request. Instead, Defendant Sims wrote to Plaintiffs and stated that the custodian of records “has again advised that additional time is necessary” to complete the request, this time providing an earliest date and time for production to be “the close of business on December 30,

2021.” *Id.*

52. On December 30, 2021, Defendants did not produce records in response to Plaintiffs’ Eighth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to January 28, 2022. *Id.*
53. On January 28, 2022, Defendants did not produce records in response to Plaintiffs’ Eighth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to March 7, 2022. *Id.*
54. On March 7, 2022, Defendants did not produce records in response to Plaintiffs’ Eighth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to April 8, 2022. *Id.*
55. On April 8, 2022, Defendants did not produce records in response to Plaintiffs’ Eighth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to May 6, 2022. *Id.*
56. On May 6, 2022, Defendants did not produce records in response to Plaintiffs’ Eighth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to June 7, 2022. *Id.*

57. On June 7, 2022, Defendants did not produce records in response to Plaintiffs' Eighth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to July 6, 2022. *Id.*
58. On July 6, 2022, Defendants did not produce records in response to Plaintiffs' Eighth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to August 8, 2022. *Id.*
59. On August 8, 2022, Defendants did not produce records in response to Plaintiffs' Eighth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to September 8, 2022. *Id.*
60. On September 8, 2022, Defendants did not produce records in response to Plaintiffs' Eighth Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to October 20, 2022. *Id.*
61. As of the date of this filing, Defendants have not produced any records in response to Plaintiffs' Eighth Sunshine Request.

Ninth Sunshine Request

62. On October 13, 2021, Defendant Sims responded to Plaintiffs' Ninth Sunshine Request, which Defendants designated as

Request R001671. (Defendants' Response to Ninth Sunshine Request, Ex. 21). Defendant Sims stated that the custodian of records determined that there are no responsive records to Plaintiffs' Ninth Sunshine Request. *Id.*

Tenth Sunshine Request

63. On October 13, 2021, Defendant Sims responded to Plaintiffs' Tenth Sunshine Request, which Defendants designated as Request R001672. (Defendants' Response to Tenth Sunshine Request, Ex. 22). Defendant Sims stated that the custodian of records "advised that additional time is necessary" to fulfill Plaintiffs' request and provided an earliest date and time for production to be "the close of business on November 29, 2021." *Id.*
64. On November 29, 2021, Defendants did not produce records in response to Plaintiffs' Tenth Sunshine Request. Instead, Defendant Sims wrote to Plaintiffs and stated: "Fees for providing access to and furnishing copies of records responsive to your request are estimated by the Custodian of Records for the Public Safety Department – Office of the Director to exceed \$50.00." *Id.* Defendant Sims did not provide an estimate for such charges or an explanation regarding how those charges were determined.

65. On December 9, 2021, Defendant Sims duplicated his response to Plaintiffs sent on November 29, 2021, without providing any additional details as to what the charges were for or what the estimated charges were. *Id.*
66. On December 10, 2021, Defendant Sims provided additional information regarding the charges. *Id.* Defendants Sims stated that “a Technical Support Specialist I with the Information Technology Services Agency worked for one hour at a rate of \$22.99 an hour.” Defendant Sims also stated that the Technical Support Specialist identified 623 potentially responsive emails “in pst format.” *Id.* Defendant Sims stated that he would need to convert those emails from pst format into PDF files, that such a process would take him approximately two hours, and that Plaintiffs would be charged for those two hours of work at a rate of \$17.50 per hour. *Id.*
67. Multiple software services are able to convert hundreds of pst documents into PDF documents within minutes.
68. Plaintiffs requested all records be provided in their native format along with their associated metadata.

Eleventh Sunshine Request

69. On October 13, 2021, Defendant Sims responded to Plaintiffs’

Eleventh Sunshine Request, which Defendants designated as Request R001673. (Defendants' Response to Eleventh Sunshine Request, Ex. 23). Defendant Sims stated that the custodian of records "advised that additional time is necessary" to fulfill Plaintiffs' request and provided an earliest date and time for production to be "the close of business on November 15, 2021." *Id.*

70. On November 15, 2021, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, Defendant Sims wrote to Plaintiffs and stated that the custodian of records "has again advised that additional time is necessary" to complete the request, this time providing an earliest date and time for production to be "the close of business on December 15, 2021." *Id.*
71. On December 15, 2021, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to January 7, 2022. *Id.*
72. On January 7, 2022, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to February 3, 2022. *Id.*

73. On February 3, 2022, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to March 3, 2022. *Id.*
74. On March 3, 2022, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to April 1, 2022. *Id.*
75. On April 1, 2022, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to April 26, 2022. *Id.*
76. On April 26, 2022, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to May 26, 2022. *Id.*
77. On May 26, 2022, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to June 30, 2022. *Id.*
78. On June 30, 2022, Defendants did not produce records in

response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to July 27, 2022. *Id.*

79. On July 27, 2022, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to August 26, 2022. *Id.*
80. On August 26, 2022, Defendants did not produce records in response to Plaintiffs' Eleventh Sunshine Request. Instead, they provided a similar response as they had previously and further delayed production to September 23, 2022. *Id.*
81. As of the date of this filing, Defendants have not produced any records in response to Plaintiffs' Eleventh Sunshine Request.

Notice to Defendants

82. On December 9, 2021, Plaintiff Gross sent Defendants Sims and Custodians of Records a letter explaining that Defendants were violating Missouri's Sunshine Law. (Letter to Defendants, Ex. 24).
83. With respect to Request 1672, Plaintiffs explained that Defendants failed to provide records on the date specified, failed to provide a reasonable cost for production of records, and failed to specify what the charged costs were for. *Id.*

84. With respect to Request 1666, Plaintiffs explained that Defendants failed to provide records on the date specified, asked for clarification when none was needed, did not provide a new date for production, and delayed producing records that were already provided to members of the media. *Id.*
85. With respect to Requests 1664, 1665, 1667, 1668, and 1673, Plaintiffs explained that Defendants failed to provide records on the dates specified. *Id.*
86. In his December 9, 2021 letter, Plaintiff Gross stated, “I am under the impression that Mr. Sims is serving as counsel for the custodians of records. If I am mistaken, please let me know.” *Id.*
87. Neither Defendant Sims nor Defendants Custodians of Records informed Plaintiffs that Defendant Sims was not serving as counsel for Defendants Custodians of Records.
88. As of the date of this filings, Defendants Custodians of Records have never responded to Plaintiffs directly. Every response has come from Defendant Sims, who is an employee of Defendant St. Louis City’s Legal Department, not the Division of Corrections or the Department of Public Safety.
89. On information and belief, Defendant Sims is not an attorney.
90. On information and belief, Defendant Sims is not authorized to

practice law in the State of Missouri.

91. On December 9, 2021, Defendant Sims provided responses to Plaintiffs' letter on each Sunshine Request, substantially duplicating responses previously provided. (Exs. 16-25).
92. On December 16, 2021, Plaintiff Gross called the St. Louis City Counselor's Office and asked to speak with the attorney who oversees the City's Sunshine Law responses. Plaintiff Gross was transferred to speak with Defendant Sims. No one, including Defendant Sims, communicated to Plaintiffs that Defendant Sims was not an attorney.
93. Defendant Sims stated that the St. Louis City Counselor's Office would not change its practices with respect to its responses to Sunshine Law requests. Specifically, Defendant Sims stated that the St. Louis City Counselor's Office would continue to change the date of production of records as they came due if the custodian of records has not yet provided the documents requested.
94. Plaintiff Gross notified Defendant Sims about the requirements of Missouri's Sunshine Law and the recent ruling from Missouri's Supreme Court in the *Gross v. Parson* case. 624 S.W.3d 877 (Mo. 2021). Defendant Sims responded saying, "We know who you are."
95. Plaintiff Gross asked Defendant Sims if Plaintiff Gross could

speak with Defendant Hamilton before filing a lawsuit. Defendant Sims stated that Plaintiff Gross could not speak with Defendant Hamilton and that Defendant Sims was the final authority on responding to Plaintiffs' Sunshine Law requests.

96. On December 17, 2021, Plaintiff Gross sent an email to Defendant Hamilton detailing his communications with Defendant Sims, explaining that Defendants were violating the Sunshine Law, and attempting to avoid litigation. (Email to Defendant Hamilton, Ex. 25). Plaintiff Gross attached a written explanation he provided on each Sunshine Request to that email. To date, Defendant Hamilton has not responded to Plaintiff's email.

Pattern of Violations

97. Defendants have failed to follow the requirements of Missouri's Sunshine Law on numerous occasions.
98. Defendants have failed to provide the earliest date and time at which records would be available on multiple requests beyond Plaintiffs'. *See, e.g.,* Ryan Krull, *St. Louis City Flirts with Violations of Sunshine Law, Critics Say*, Riverfront Times, Aug. 24, 2022, available online at <https://www.riverfronttimes.com/news/st-louis-city-flirts-with-violations-of-sunshine-law-critics-say-38353420>.
99. In addition to Plaintiffs, multiple attorneys have notified

Defendants of their failure to follow the Sunshine Law. *Id.*

100. As a result of their ongoing violations, Defendants are illegally delaying and denying access to public records to reporters, attorneys, and other members of the public.

101. Defendants have established a system by which they regularly violate Missouri's Sunshine Law and use public funding to deny the public access to public records.

Requirements of the Sunshine Law

102. The Missouri Sunshine Law requires that when public bodies do not provide requested records immediately, the public bodies "shall give a detailed explanation of the cause for further delay and place and earliest time and date that the record will be available for inspection." RSMo. § 610.023.3; *Gross v. Parson*, 624 S.W.3d 877, 889 (Mo. 2021) (en banc). Additionally, public bodies are required to provide the "exact calendar date upon which [the requester] could inspect the requested records," not an estimate. *Gross v. Parson*, 624 S.W.3d at 889.

103. With respect to production format, Missouri's Sunshine Law requires that "if records are requested in a certain format, the public body shall provide the records in the requested format, if such format is available." RSMo. § 610.023.3.

104. With respect to costs for electronically stored records, Missouri's Sunshine Law permits public entities to only charge fees that are required to provide access to public records, and those fees "shall include only the cost of copies, staff time, which shall not exceed the average hourly rate of pay for staff of the public governmental body required for making copies and programming, if necessary, and the cost of the disk, tape, or other medium used for the duplication." RSMo. § 610.026.2; *Gross v. Parson*, 624 S.W.3d at 887-88.

Role of Defendants

105. Defendant City of St. Louis is a public governmental entity subject to Missouri's Sunshine Law. As a municipal entity, Defendant City of St. Louis has established an illegal pattern or practice of violating Missouri's Sunshine Law to deny members of the public access to public records. Defendant City of St. Louis maintains an online Public Records Center at the center of this illegal operation. Defendant City of St. Louis has improperly delayed producing records, failed to provide the earliest time and date at which records would be available, failed to provide a detailed explanation for the cause for delayed production, charged requesters improper fees, failed to provide records in their native electronic format when requested, and maintains a system by which the

custodians of records of various City divisions and departments do not respond to Sunshine Requests as required by law.

106. Defendant Joseph Sims is the Sunshine Law Coordinator at the St. Louis City Counselor's Office. Defendant Sims is directly involved in responding to Sunshine Requests sent to the City of St. Louis, including the ones at issue in this case. Defendant Sims has improperly delayed producing records, failed to provide the earliest time and date at which records would be available, failed to provide a detailed explanation for the cause for delayed production, charged requesters improper fees, failed to provide records in their native electronic format when requested, and maintains a system by which the custodians of records of various City divisions and departments do not respond to Sunshine Requests as required by law.

107. Defendant Sheena Hamilton is the St. Louis City Counselor. Defendant Hamilton oversees Defendants Sims and City of St. Louis's response to Sunshine Requests. Defendant Hamilton has direct knowledge of the Sunshine Requests and illegal responses involved in this case and personally refused to rectify the violations included in this Petition. Defendant Hamilton has improperly delayed producing records, failed to provide the earliest time and date at which records would be available, failed to provide a detailed

explanation for the cause for delayed production, charged requesters improper fees, failed to provide records in their native electronic format when requested, and maintains a system by which the custodians of records of various City divisions and departments do not respond to Sunshine Requests as required by law.

108. Defendant Tishaura Jones is the Mayor of the City of St. Louis and is sued in her official capacity.

109. Defendant Custodian of Records for the St. Louis City Division of Records is currently unidentifiable by name because they have failed to respond to any of Plaintiffs' requests as required by the Sunshine Law. Defendant has improperly delayed producing records, failed to provide the earliest time and date at which records would be available, failed to provide a detailed explanation for the cause for delayed production, charged requesters improper fees, failed to provide records in their native electronic format when requested, and maintains a system by which the custodians of records of various City divisions and departments do not respond to Sunshine Requests as required by law.

110. Defendant Custodian of Records for the St. Louis City Department of Public Safety is currently unidentifiable by name because they have failed to respond to any of Plaintiffs' requests as

required by the Sunshine Law. Defendant has improperly delayed producing records, failed to provide the earliest time and date at which records would be available, failed to provide a detailed explanation for the cause for delayed production, charged requesters improper fees, failed to provide records in their native electronic format when requested, and maintains a system by which the custodians of records of various City divisions and departments do not respond to Sunshine Requests as required by law.

Harm

111. As a result of Defendants' actions, Plaintiffs have been denied their legal rights as Missourians to access public records.
112. Additionally, Plaintiff Childs has suffered unwarranted delay in being able to investigate the facts surrounding the injuries he suffered as a detainee in the City of St. Louis. Every day that Defendants delay producing records eliminates another day from the statutes of limitations governing any claims Plaintiff may have for his injuries.
113. Defendants' violations of the Sunshine Law have interfered with Plaintiff Gross's ability to provide high quality legal representation to Plaintiff Childs, thus interfering with Plaintiff Gross's employment.

**COUNTS WITH RESPECT TO PLAINTIFFS' FIRST SUNSHINE
REQUEST**

**COUNT I: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
FIRST SUNSHINE REQUEST**

114. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

115. Defendants are subject to the requirements of RSMo. Chapter 610.

116. Plaintiffs properly submitted their First Sunshine Request to Defendants seeking various records from Defendants.

117. Plaintiffs' First Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

118. Defendants did not immediately provide the requested records within three business days.

119. Instead of producing records, Defendants improperly claimed that Plaintiffs' First Sunshine Request required clarification, thereby indefinitely delaying production of records.

120. Defendants, therefore, failed to provide the earliest time and date

the records would be available as required by RSMo. § 610.023.3.

121. Defendants violated RSMo. Chapter 610.

122. Defendants are aware of the requirements of RSMo. Chapter 610.

123. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

124. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' First Sunshine Request.

125. Defendants knowingly violated RSMo. Chapter 610.

126. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

127. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

128. Defendants purposely violated RSMo. Chapter 610.

129. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

130. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

131. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records

and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT II: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' FIRST SUNSHINE REQUEST**

132. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

133. Defendants are subject to the requirements of RSMo. Chapter 610.

134. Plaintiffs properly submitted their First Sunshine Request to Defendants seeking various records from Defendants.

135. Plaintiffs' First Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

136. Defendants did not immediately provide the requested records within three business days.

137. Instead of producing records, Defendants improperly claimed that Plaintiffs' First Sunshine Request required clarification, thereby indefinitely delaying production of records.

138. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

139. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

140. Defendants violated RSMo. Chapter 610.

141. Defendants are aware of the requirements of RSMo. Chapter 610.

142. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

143. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' First Sunshine Request.

144. Defendants knowingly violated RSMo. Chapter 610.

145. Defendants violated RSMo. Chapter 610 as part of a practice by

which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

146. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

147. Defendants purposely violated RSMo. Chapter 610.

148. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT III: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW**

BY FAILING TO RESPOND TO PLAINTIFFS' FIRST SUNSHINE

REQUEST

149. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

150. Defendants are subject to the requirements of RSMo. Chapter 610.

151. Plaintiffs properly submitted their First Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

152. Plaintiffs' First Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

153. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' First Sunshine Request.

154. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to respond to Plaintiffs' First Sunshine Request within three business days as required by RSMo. § 610.023.3.

155. Defendants violated RSMo. Chapter 610.

156. Defendants are aware of the requirements of RSMo. Chapter 610.

157. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a response to their Sunshine Request.

158. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' First Sunshine Request.

159. Defendants knowingly violated RSMo. Chapter 610.

160. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

161. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

162. Defendants purposely violated RSMo. Chapter 610.

163. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and

reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT IV: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
FIRST SUNSHINE REQUEST**

164. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

165. Defendants are subject to the requirements of RSMo. Chapter 610.

166. Plaintiffs properly submitted their First Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

167. Plaintiffs' First Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

168. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' First Sunshine Request.

169. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

170. Defendants violated RSMo. Chapter 610.

171. Defendants are aware of the requirements of RSMo. Chapter 610.

172. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.

173. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' First Sunshine Request.

174. Defendants knowingly violated RSMo. Chapter 610.

175. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

176. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

177. Defendants purposely violated RSMo. Chapter 610.

178. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a

civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT V: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' FIRST SUNSHINE REQUEST**

179. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

180. Defendants are subject to the requirements of RSMo. Chapter 610.

181. Plaintiffs properly submitted their First Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

182. Plaintiffs' First Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

183. Defendant Custodian of Records for the St. Louis City Division of

Corrections never responded to Plaintiffs' First Sunshine Request.

184. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

185. Defendants violated RSMo. Chapter 610.

186. Defendants are aware of the requirements of RSMo. Chapter 610.

187. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

188. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' First Sunshine Request.

189. Defendants knowingly violated RSMo. Chapter 610.

190. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

191. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

192. Defendants purposely violated RSMo. Chapter 610.

193. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public

records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNTS WITH RESPECT TO PLAINTIFFS' SECOND SUNSHINE
REQUEST**

**COUNT VI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
SECOND SUNSHINE REQUEST ON OCTOBER 13, 2021**

194. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

195. Defendants are subject to the requirements of RSMo. Chapter 610.
196. Plaintiffs properly submitted their Second Sunshine Request to Defendants seeking various records from Defendants.
197. Plaintiffs' Second Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.
198. Defendants did not immediately provide the requested records within three business days.
199. Defendants stated that they would produce records on November 30, 2021.
200. Defendants did not produce records on November 30, 2021.
201. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
202. Defendants violated RSMo. Chapter 610.
203. Defendants are aware of the requirements of RSMo. Chapter 610.
204. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.
205. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Second Sunshine Request.
206. Defendants knowingly violated RSMo. Chapter 610.

207. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

208. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

209. Defendants purposely violated RSMo. Chapter 610.

210. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

211. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

212. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and

reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT VII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' SECOND SUNSHINE REQUEST ON OCTOBER 13, 2021**

213. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

214. Defendants are subject to the requirements of RSMo. Chapter 610.

215. Plaintiffs properly submitted their Second Sunshine Request to Defendants seeking various records from Defendants.

216. Plaintiffs' Second Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

217. Defendants did not immediately provide the requested records within three business days.

218. Defendants stated that they would produce records on November 30, 2021.

219. Defendants did not produce records on November 30, 2021.

220. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

221. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.
222. Defendants violated RSMo. Chapter 610.
223. Defendants are aware of the requirements of RSMo. Chapter 610.
224. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.
225. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Second Sunshine Request.
226. Defendants knowingly violated RSMo. Chapter 610.
227. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
228. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
229. Defendants purposely violated RSMo. Chapter 610.
230. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT VIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
SECOND SUNSHINE REQUEST ON NOVEMBER 30, 2021**

231. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

232. Defendants are subject to the requirements of RSMo. Chapter 610.

233. Plaintiffs properly submitted their Second Sunshine Request to Defendants seeking various records from Defendants.

234. Plaintiffs' Second Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

235. Defendants did not immediately provide the requested records within three business days.
236. Defendants stated that they would produce records on January 13, 2022.
237. Defendants did not produce records on January 13, 2022.
238. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
239. Defendants violated RSMo. Chapter 610.
240. Defendants are aware of the requirements of RSMo. Chapter 610.
241. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.
242. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Second Sunshine Request.
243. Defendants knowingly violated RSMo. Chapter 610.
244. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
245. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
246. Defendants purposely violated RSMo. Chapter 610.

247. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

248. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

249. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT IX: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR**

PLAINTIFFS' SECOND SUNSHINE REQUEST ON NOVEMBER 30,

2021

250. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

251. Defendants are subject to the requirements of RSMo. Chapter 610.

252. Plaintiffs properly submitted their Second Sunshine Request to Defendants seeking various records from Defendants.

253. Plaintiffs' Second Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

254. Defendants did not immediately provide the requested records within three business days.

255. Defendants stated that they would produce records on January 13, 2022.

256. Defendants did not produce records on January 13, 2022.

257. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

258. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

259. Defendants violated RSMo. Chapter 610.

260. Defendants are aware of the requirements of RSMo. Chapter 610.

261. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

262. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Second Sunshine Request.

263. Defendants knowingly violated RSMo. Chapter 610.

264. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

265. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

266. Defendants purposely violated RSMo. Chapter 610.

267. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue

an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT X: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO RESPOND TO PLAINTIFFS' SECOND SUNSHINE
REQUEST**

268. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

269. Defendants are subject to the requirements of RSMo. Chapter 610.

270. Plaintiffs properly submitted their Second Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

271. Plaintiffs' Second Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

272. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Second Sunshine Request.

273. Defendant Custodian of Records for the St. Louis City Division of

Corrections, therefore, failed to respond to Plaintiffs' Second Sunshine Request within three business days as required by RSMo. § 610.023.3.

274. Defendants violated RSMo. Chapter 610.

275. Defendants are aware of the requirements of RSMo. Chapter 610.

276. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a response to their Sunshine Request.

277. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Second Sunshine Request.

278. Defendants knowingly violated RSMo. Chapter 610.

279. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

280. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

281. Defendants purposely violated RSMo. Chapter 610.

282. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XI: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
SECOND SUNSHINE REQUEST**

283. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

284. Defendants are subject to the requirements of RSMo. Chapter 610.

285. Plaintiffs properly submitted their Second Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

286. Plaintiffs' Second Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.
287. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Second Sunshine Request.
288. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
289. Defendants violated RSMo. Chapter 610.
290. Defendants are aware of the requirements of RSMo. Chapter 610.
291. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.
292. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Second Sunshine Request.
293. Defendants knowingly violated RSMo. Chapter 610.
294. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
295. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
296. Defendants purposely violated RSMo. Chapter 610.

297. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XII: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' SECOND SUNSHINE REQUEST**

298. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

299. Defendants are subject to the requirements of RSMo. Chapter

610.

300. Plaintiffs properly submitted their Second Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

301. Plaintiffs' Second Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

302. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Second Sunshine Request.

303. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

304. Defendants violated RSMo. Chapter 610.

305. Defendants are aware of the requirements of RSMo. Chapter 610.

306. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

307. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Second Sunshine Request.

308. Defendants knowingly violated RSMo. Chapter 610.

309. Defendants violated RSMo. Chapter 610 as part of a practice by

which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

310. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

311. Defendants purposely violated RSMo. Chapter 610.

312. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNTS WITH RESPECT TO PLAINTIFFS' THIRD SUNSHINE
REQUEST**

**COUNT XIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
THIRD SUNSHINE REQUEST ON OCTOBER 13, 2021**

313. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

314. Defendants are subject to the requirements of RSMo. Chapter 610.

315. Plaintiffs properly submitted their Third Sunshine Request to Defendants seeking various records from Defendants.

316. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

317. Defendants did not immediately provide the requested records within three business days.

318. Defendants stated that they would produce records on December 1, 2021.

319. Defendants did not produce records on December 1, 2021.

320. Defendants, therefore, failed to provide the earliest time and date

the records would be available as required by RSMo. § 610.023.3.

321. Defendants violated RSMo. Chapter 610.

322. Defendants are aware of the requirements of RSMo. Chapter 610.

323. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

324. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Third Sunshine Request.

325. Defendants knowingly violated RSMo. Chapter 610.

326. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

327. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

328. Defendants purposely violated RSMo. Chapter 610.

329. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

330. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

331. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records

and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XIV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' THIRD SUNSHINE REQUEST ON OCTOBER 13, 2021**

332. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

333. Defendants are subject to the requirements of RSMo. Chapter 610.

334. Plaintiffs properly submitted their Third Sunshine Request to Defendants seeking various records from Defendants.

335. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.
336. Defendants did not immediately provide the requested records within three business days.
337. Defendants stated that they would produce records on December 1, 2021.
338. Defendants did not produce records on December 1, 2021.
339. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.
340. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.
341. Defendants violated RSMo. Chapter 610.
342. Defendants are aware of the requirements of RSMo. Chapter 610.
343. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.
344. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Third Sunshine Request.
345. Defendants knowingly violated RSMo. Chapter 610.
346. Defendants violated RSMo. Chapter 610 as part of a practice by

which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

347. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

348. Defendants purposely violated RSMo. Chapter 610.

349. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME**

AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'

THIRD SUNSHINE REQUEST ON DECEMBER 1, 2021

350. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

351. Defendants are subject to the requirements of RSMo. Chapter 610.

352. Plaintiffs properly submitted their Third Sunshine Request to Defendants seeking various records from Defendants.

353. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

354. Defendants did not immediately provide the requested records within three business days.

355. Defendants stated that they would produce records on January 13, 2022.

356. Defendants did not produce records on January 13, 2022.

357. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

358. Defendants violated RSMo. Chapter 610.

359. Defendants are aware of the requirements of RSMo. Chapter 610.

360. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records

would be available.

361. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Third Sunshine Request.

362. Defendants knowingly violated RSMo. Chapter 610.

363. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

364. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

365. Defendants purposely violated RSMo. Chapter 610.

366. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

367. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

368. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a

civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XVI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' THIRD SUNSHINE REQUEST ON DECEMBER 1, 2021**

369. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

370. Defendants are subject to the requirements of RSMo. Chapter 610.

371. Plaintiffs properly submitted their Third Sunshine Request to Defendants seeking various records from Defendants.

372. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

373. Defendants did not immediately provide the requested records within three business days.

374. Defendants stated that they would produce records on January

13, 2022.

375. Defendants did not produce records on January 13, 2022.
376. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.
377. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.
378. Defendants violated RSMo. Chapter 610.
379. Defendants are aware of the requirements of RSMo. Chapter 610.
380. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.
381. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Third Sunshine Request.
382. Defendants knowingly violated RSMo. Chapter 610.
383. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
384. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
385. Defendants purposely violated RSMo. Chapter 610.

386. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XVII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
THIRD SUNSHINE REQUEST ON JANUARY 13, 2022**

387. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

388. Defendants are subject to the requirements of RSMo. Chapter 610.

389. Plaintiffs properly submitted their Third Sunshine Request to Defendants seeking various records from Defendants.
390. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.
391. Defendants did not immediately provide the requested records within three business days.
392. Defendants stated that they would produce records on February 17, 2022.
393. Defendants did not produce records on February 17, 2022.
394. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
395. Defendants violated RSMo. Chapter 610.
396. Defendants are aware of the requirements of RSMo. Chapter 610.
397. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.
398. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Third Sunshine Request.
399. Defendants knowingly violated RSMo. Chapter 610.
400. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production

of public records in violation of the Sunshine Law.

401. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

402. Defendants purposely violated RSMo. Chapter 610.

403. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

404. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

405. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XVIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' THIRD SUNSHINE REQUEST ON JANUARY 13, 2022**

406. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

407. Defendants are subject to the requirements of RSMo. Chapter 610.

408. Plaintiffs properly submitted their Third Sunshine Request to Defendants seeking various records from Defendants.

409. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

410. Defendants did not immediately provide the requested records within three business days.

411. Defendants stated that they would produce records on February 17, 2022.

412. Defendants did not produce records on February 17, 2022.

413. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

414. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required

by RSMo. § 610.023.3.

415. Defendants violated RSMo. Chapter 610.

416. Defendants are aware of the requirements of RSMo. Chapter 610.

417. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

418. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Third Sunshine Request.

419. Defendants knowingly violated RSMo. Chapter 610.

420. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

421. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

422. Defendants purposely violated RSMo. Chapter 610.

423. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the

amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XIX: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
THIRD SUNSHINE REQUEST ON FEBRUARY 17, 2022**

424. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

425. Defendants are subject to the requirements of RSMo. Chapter 610.

426. Plaintiffs properly submitted their Third Sunshine Request to Defendants seeking various records from Defendants.

427. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

428. Defendants did not immediately provide the requested records within three business days.

429. Defendants stated that they would produce records on March 24, 2022.
430. Defendants did not produce records on March 24, 2022.
431. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
432. Defendants violated RSMo. Chapter 610.
433. Defendants are aware of the requirements of RSMo. Chapter 610.
434. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.
435. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Third Sunshine Request.
436. Defendants knowingly violated RSMo. Chapter 610.
437. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
438. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
439. Defendants purposely violated RSMo. Chapter 610.
440. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

441. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

442. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XX: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' THIRD SUNSHINE REQUEST ON FEBRUARY 17, 2022**

443. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

444. Defendants are subject to the requirements of RSMo. Chapter 610.
445. Plaintiffs properly submitted their Third Sunshine Request to Defendants seeking various records from Defendants.
446. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.
447. Defendants did not immediately provide the requested records within three business days.
448. Defendants stated that they would produce records on March 24, 2022.
449. Defendants did not produce records on March 24, 2022.
450. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.
451. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.
452. Defendants violated RSMo. Chapter 610.
453. Defendants are aware of the requirements of RSMo. Chapter 610.
454. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

455. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Third Sunshine Request.

456. Defendants knowingly violated RSMo. Chapter 610.

457. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

458. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

459. Defendants purposely violated RSMo. Chapter 610.

460. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and

reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXI: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO RESPOND TO PLAINTIFFS' THIRD SUNSHINE
REQUEST**

461. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

462. Defendants are subject to the requirements of RSMo. Chapter 610.

463. Plaintiffs properly submitted their Third Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

464. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

465. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Third Sunshine Request.

466. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to respond to Plaintiffs' Sunshine Request within three business days as required by RSMo. § 610.023.3.

467. Defendants violated RSMo. Chapter 610.

468. Defendants are aware of the requirements of RSMo. Chapter 610.

469. Defendants knew that they were required by the Sunshine Law
to provide Plaintiffs with a response to their Sunshine Request.

470. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Third Sunshine Request.

471. Defendants knowingly violated RSMo. Chapter 610.

472. Defendants violated RSMo. Chapter 610 as part of a practice by
which the City of St. Louis and Defendants delay or deny production
of public records in violation of the Sunshine Law.

473. Defendants were aware of the probable consequences of violating
RSMo. Chapter 610.

474. Defendants purposely violated RSMo. Chapter 610.

475. As a direct and proximate result of Defendants' actions, Plaintiffs
have been denied access or have received delayed access to public
records and have undertaken substantial costs to enforce Missouri's
Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their
favor and against Defendants, order Defendants to pay a civil penalty in the
amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a
civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue

an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXII: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
THIRD SUNSHINE REQUEST**

476. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

477. Defendants are subject to the requirements of RSMo. Chapter 610.

478. Plaintiffs properly submitted their Third Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

479. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

480. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Third Sunshine Request.

481. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
482. Defendants violated RSMo. Chapter 610.
483. Defendants are aware of the requirements of RSMo. Chapter 610.
484. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.
485. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Third Sunshine Request.
486. Defendants knowingly violated RSMo. Chapter 610.
487. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
488. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
489. Defendants purposely violated RSMo. Chapter 610.
490. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXIII: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' THIRD SUNSHINE REQUEST**

491. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

492. Defendants are subject to the requirements of RSMo. Chapter 610.

493. Plaintiffs properly submitted their Third Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

494. Plaintiffs' Third Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.
495. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Third Sunshine Request.
496. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.
497. Defendants violated RSMo. Chapter 610.
498. Defendants are aware of the requirements of RSMo. Chapter 610.
499. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.
500. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Third Sunshine Request.
501. Defendants knowingly violated RSMo. Chapter 610.
502. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
503. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

504. Defendants purposely violated RSMo. Chapter 610.

505. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNTS WITH RESPECT TO PLAINTIFFS' FOURTH SUNSHINE

REQUEST

**COUNT XXIV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME**

AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'

FOURTH SUNSHINE REQUEST ON OCTOBER 13, 2021

506. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

507. Defendants are subject to the requirements of RSMo. Chapter 610.

508. Plaintiffs properly submitted their Fourth Sunshine Request to Defendants seeking various records from Defendants.

509. Plaintiffs' Fourth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

510. Defendants did not immediately provide the requested records within three business days.

511. Defendants stated that they would produce records on November 1, 2021.

512. Defendants did not produce records on November 1, 2021.

513. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

514. Defendants violated RSMo. Chapter 610.

515. Defendants are aware of the requirements of RSMo. Chapter 610.

516. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records

would be available.

517. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Fourth Sunshine Request.

518. Defendants knowingly violated RSMo. Chapter 610.

519. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

520. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

521. Defendants purposely violated RSMo. Chapter 610.

522. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

523. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

524. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a

civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' FOURTH SUNSHINE REQUEST ON OCTOBER 13,**

2021

525. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

526. Defendants are subject to the requirements of RSMo. Chapter 610.

527. Plaintiffs properly submitted their Fourth Sunshine Request to Defendants seeking various records from Defendants.

528. Plaintiffs' Fourth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

529. Defendants did not immediately provide the requested records within three business days.

530. Defendants stated that they would produce records on November 1, 2021.
531. Defendants did not produce records on November 1, 2021.
532. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.
533. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.
534. Defendants violated RSMo. Chapter 610.
535. Defendants are aware of the requirements of RSMo. Chapter 610.
536. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.
537. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Fourth Sunshine Request.
538. Defendants knowingly violated RSMo. Chapter 610.
539. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
540. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

541. Defendants purposely violated RSMo. Chapter 610.

542. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXVI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
FOURTH SUNSHINE REQUEST ON NOVEMBER 1, 2021**

543. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

544. Defendants are subject to the requirements of RSMo. Chapter

610.

545. Plaintiffs properly submitted their Fourth Sunshine Request to Defendants seeking various records from Defendants.

546. Plaintiffs' Fourth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

547. Defendants did not immediately provide the requested records within three business days.

548. Defendants stated that they would produce records on November 1, 2021.

549. Defendants did not produce records on November 1, 2021.

550. On November 1, 2021, Defendants asked Plaintiffs for clarification regarding his Fourth Sunshine Request despite the fact that no clarification was needed for Defendants to fulfill Plaintiffs' request.

551. On November 1, 2021, Defendants did not provide the time and date by which records would be available.

552. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

553. Defendants violated RSMo. Chapter 610.

554. Defendants are aware of the requirements of RSMo. Chapter 610.

555. Defendants knew that they were required by the Sunshine Law

to provide Plaintiffs with the earliest time and date the records would be available.

556. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Fourth Sunshine Request.

557. Defendants knowingly violated RSMo. Chapter 610.

558. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

559. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

560. Defendants purposely violated RSMo. Chapter 610.

561. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

562. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

563. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the

amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXVII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' FOURTH SUNSHINE REQUEST ON NOVEMBER 1,
2021**

564. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

565. Defendants are subject to the requirements of RSMo. Chapter 610.

566. Plaintiffs properly submitted their Fourth Sunshine Request to Defendants seeking various records from Defendants.

567. Plaintiffs' Fourth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

568. Defendants did not immediately provide the requested records

within three business days.

569. Defendants stated that they would produce records on November 1, 2021.

570. Defendants did not produce records on November 1, 2021.

571. On November 1, 2021, Defendants asked Plaintiffs for clarification regarding his Fourth Sunshine Request despite the fact that no clarification was needed for Defendants to fulfill Plaintiffs' request.

572. On November 1, 2021, Defendants did not provide the time and date by which records would be available and did not provide an explanation for why clarification or further delay was required.

573. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

574. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

575. Defendants violated RSMo. Chapter 610.

576. Defendants are aware of the requirements of RSMo. Chapter 610.

577. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

578. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Fourth Sunshine Request.

579. Defendants knowingly violated RSMo. Chapter 610.

580. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

581. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

582. Defendants purposely violated RSMo. Chapter 610.

583. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and

reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXVIII: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO RESPOND TO PLAINTIFFS' FOURTH SUNSHINE
REQUEST**

584. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

585. Defendants are subject to the requirements of RSMo. Chapter 610.

586. Plaintiffs properly submitted their Fourth Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

587. Plaintiffs' Fourth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

588. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Fourth Sunshine Request.

589. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to respond to Plaintiffs' Sunshine Request within three business days as required by RSMo. § 610.023.3.

590. Defendants violated RSMo. Chapter 610.

591. Defendants are aware of the requirements of RSMo. Chapter 610.

592. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a response to their Sunshine Request.

593. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Fourth Sunshine Request.

594. Defendants knowingly violated RSMo. Chapter 610.

595. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

596. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

597. Defendants purposely violated RSMo. Chapter 610.

598. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue

an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXIX: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
FOURTH SUNSHINE REQUEST**

599. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

600. Defendants are subject to the requirements of RSMo. Chapter 610.

601. Plaintiffs properly submitted their Fourth Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

602. Plaintiffs' Fourth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

603. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Fourth Sunshine Request.

604. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
605. Defendants violated RSMo. Chapter 610.
606. Defendants are aware of the requirements of RSMo. Chapter 610.
607. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.
608. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Fourth Sunshine Request.
609. Defendants knowingly violated RSMo. Chapter 610.
610. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
611. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
612. Defendants purposely violated RSMo. Chapter 610.
613. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXX: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' FOURTH SUNSHINE REQUEST**

614. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

615. Defendants are subject to the requirements of RSMo. Chapter 610.

616. Plaintiffs properly submitted their Fourth Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

617. Plaintiffs' Fourth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.
618. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Fourth Sunshine Request.
619. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.
620. Defendants violated RSMo. Chapter 610.
621. Defendants are aware of the requirements of RSMo. Chapter 610.
622. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.
623. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Fourth Sunshine Request.
624. Defendants knowingly violated RSMo. Chapter 610.
625. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
626. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

627. Defendants purposely violated RSMo. Chapter 610.

628. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNTS WITH RESPECT TO PLAINTIFFS' FIFTH SUNSHINE

REQUEST

**COUNT XXXI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME**

AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'

FIFTH SUNSHINE REQUEST ON OCTOBER 13, 2021

629. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

630. Defendants are subject to the requirements of RSMo. Chapter 610.

631. Plaintiffs properly submitted their Fifth Sunshine Request to Defendants seeking various records from Defendants.

632. Plaintiffs' Fifth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

633. Defendants did not immediately provide the requested records within three business days.

634. Defendants stated that they would produce records on December 1, 2021.

635. Defendants did not produce records on December 1, 2021.

636. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

637. Defendants violated RSMo. Chapter 610.

638. Defendants are aware of the requirements of RSMo. Chapter 610.

639. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records

would be available.

640. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Fifth Sunshine Request.

641. Defendants knowingly violated RSMo. Chapter 610.

642. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

643. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

644. Defendants purposely violated RSMo. Chapter 610.

645. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

646. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

647. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a

civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' FIFTH SUNSHINE REQUEST ON OCTOBER 13, 2021**

648. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

649. Defendants are subject to the requirements of RSMo. Chapter 610.

650. Plaintiffs properly submitted their Fifth Sunshine Request to Defendants seeking various records from Defendants.

651. Plaintiffs' Fifth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

652. Defendants did not immediately provide the requested records within three business days.

653. Defendants stated that they would produce records on December

1, 2021.

654. Defendants did not produce records on December 1, 2021.

655. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

656. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

657. Defendants violated RSMo. Chapter 610.

658. Defendants are aware of the requirements of RSMo. Chapter 610.

659. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

660. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Fifth Sunshine Request.

661. Defendants knowingly violated RSMo. Chapter 610.

662. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

663. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

664. Defendants purposely violated RSMo. Chapter 610.

665. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT XXXIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
FIFTH SUNSHINE REQUEST ON DECEMBER 1, 2021

666. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

667. Defendants are subject to the requirements of RSMo. Chapter 610.

668. Plaintiffs properly submitted their Fifth Sunshine Request to Defendants seeking various records from Defendants.
669. Plaintiffs' Fifth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.
670. Defendants did not immediately provide the requested records within three business days.
671. Defendants stated that they would produce records on January 14, 2022.
672. Defendants did not produce records on January 14, 2022.
673. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
674. Defendants violated RSMo. Chapter 610.
675. Defendants are aware of the requirements of RSMo. Chapter 610.
676. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.
677. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Fifth Sunshine Request.
678. Defendants knowingly violated RSMo. Chapter 610.
679. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production

of public records in violation of the Sunshine Law.

680. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

681. Defendants purposely violated RSMo. Chapter 610.

682. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

683. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

684. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXIV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' FIFTH SUNSHINE REQUEST ON DECEMBER 1, 2021**

685. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

686. Defendants are subject to the requirements of RSMo. Chapter 610.

687. Plaintiffs properly submitted their Fifth Sunshine Request to Defendants seeking various records from Defendants.

688. Plaintiffs' Fifth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

689. Defendants did not immediately provide the requested records within three business days.

690. Defendants stated that they would produce records on January 14, 2022.

691. Defendants did not produce records on January 14, 2022.

692. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

693. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required

by RSMo. § 610.023.3.

694. Defendants violated RSMo. Chapter 610.

695. Defendants are aware of the requirements of RSMo. Chapter 610.

696. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

697. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Fifth Sunshine Request.

698. Defendants knowingly violated RSMo. Chapter 610.

699. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

700. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

701. Defendants purposely violated RSMo. Chapter 610.

702. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the

amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE PLAINTIFFS WITH RECORDS STORED IN
THEIR NATIVE ELECTRONIC FORMAT REQUESTED IN HIS FIFTH
SUNSHINE REQUEST**

703. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

704. Defendants are subject to the requirements of RSMo. Chapter 610.

705. Plaintiffs properly submitted their Fifth Sunshine Request to Defendants seeking various records from Defendants.

706. Plaintiffs' Fifth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

707. Plaintiffs requested the public records be produced in their original native electronic format along with their metadata.

708. The requested public records are stored as personal storage table, or “pst,” files.

709. Instead of producing the requested records in their native electronic pst file format, Defendants would not provide Plaintiffs with the requested records unless Plaintiffs paid a fee for the records to be converted to portable document format, or “PDF,” files.

710. Defendants, therefore, failed to provide the records requested in the requested format despite their availability as required by RSMo. § 610.023.3.

711. Defendants violated RSMo. Chapter 610.

712. Defendants are aware of the requirements of RSMo. Chapter 610.

713. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with public records in the available format he requested.

714. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs’ Fifth Sunshine Request.

715. Defendants knowingly violated RSMo. Chapter 610.

716. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

717. Defendants were aware of the probable consequences of violating

RSMo. Chapter 610.

718. Defendants purposely violated RSMo. Chapter 610.

719. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXVI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
CHARGING PLAINTIFFS IMPROPER FEES TO ACCESS RECORDS
REQUESTED IN HIS FIFTH SUNSHINE REQUEST**

720. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

721. Defendants are subject to the requirements of RSMo. Chapter

610.

722. Plaintiffs properly submitted their Fifth Sunshine Request to Defendants seeking various records from Defendants.

723. Plaintiffs' Fifth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

724. Plaintiffs requested the public records be produced in their original native electronic format along with their metadata.

725. The requested public records are stored as personal storage table, or "pst," files.

726. Instead of producing the requested records in their native electronic pst file format, Defendants would not provide Plaintiffs with the requested records unless Plaintiffs paid a fee for the records to be converted to portable document format, or "PDF," files.

727. Defendants claimed that the process to convert pst files to PDF files would take multiple hours when in fact the process to convert the number of pst files involved to PDF files takes only a few minutes.

728. Defendants, therefore, charged Plaintiffs unnecessary and unauthorized fees to access electronically stored public records in violation of RSMo. § 610.026.2.

729. Defendants violated RSMo. Chapter 610.

730. Defendants are aware of the requirements of RSMo. Chapter 610.

731. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with public records in the available format he requested.

732. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Fifth Sunshine Request.

733. Defendants knowingly violated RSMo. Chapter 610.

734. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

735. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

736. Defendants purposely violated RSMo. Chapter 610.

737. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue

an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXVII: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO RESPOND TO PLAINTIFFS' FIFTH SUNSHINE
REQUEST**

738. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

739. Defendants are subject to the requirements of RSMo. Chapter 610.

740. Plaintiffs properly submitted their Fifth Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

741. Plaintiffs' Fifth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

742. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Fifth Sunshine Request.

743. Defendant Custodian of Records for the St. Louis City Division of

Corrections, therefore, failed to respond to Plaintiffs' Sunshine Request within three business days as required by RSMo. § 610.023.3.

744. Defendants violated RSMo. Chapter 610.

745. Defendants are aware of the requirements of RSMo. Chapter 610.

746. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a response to their Sunshine Request.

747. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Fifth Sunshine Request.

748. Defendants knowingly violated RSMo. Chapter 610.

749. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

750. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

751. Defendants purposely violated RSMo. Chapter 610.

752. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXVIII: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
FIFTH SUNSHINE REQUEST**

753. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

754. Defendants are subject to the requirements of RSMo. Chapter 610.

755. Plaintiffs properly submitted their Fifth Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

756. Plaintiffs' Fifth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.
757. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Fifth Sunshine Request.
758. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
759. Defendants violated RSMo. Chapter 610.
760. Defendants are aware of the requirements of RSMo. Chapter 610.
761. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.
762. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Fifth Sunshine Request.
763. Defendants knowingly violated RSMo. Chapter 610.
764. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
765. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
766. Defendants purposely violated RSMo. Chapter 610.

767. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXIX: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' FIFTH SUNSHINE REQUEST**

768. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

769. Defendants are subject to the requirements of RSMo. Chapter

610.

770. Plaintiffs properly submitted their Fifth Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

771. Plaintiffs' Fifth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

772. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Fifth Sunshine Request.

773. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

774. Defendants violated RSMo. Chapter 610.

775. Defendants are aware of the requirements of RSMo. Chapter 610.

776. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

777. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Fifth Sunshine Request.

778. Defendants knowingly violated RSMo. Chapter 610.

779. Defendants violated RSMo. Chapter 610 as part of a practice by

which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

780. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

781. Defendants purposely violated RSMo. Chapter 610.

782. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNTS WITH RESPECT TO PLAINTIFFS' SIXTH SUNSHINE
REQUEST**

COUNT XL: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
SIXTH SUNSHINE REQUEST ON OCTOBER 13, 2021

783. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

784. Defendants are subject to the requirements of RSMo. Chapter 610.

785. Plaintiffs properly submitted their Sixth Sunshine Request to Defendants seeking various records from Defendants.

786. Plaintiffs' Sixth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

787. Defendants did not immediately provide the requested records within three business days.

788. Defendants stated that they would produce records on November 30, 2021.

789. Defendants did not produce records on November 30, 2021.

790. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

791. Defendants violated RSMo. Chapter 610.

792. Defendants are aware of the requirements of RSMo. Chapter 610.

793. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

794. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Sixth Sunshine Request.

795. Defendants knowingly violated RSMo. Chapter 610.

796. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

797. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

798. Defendants purposely violated RSMo. Chapter 610.

799. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

800. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

801. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XLI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' SIXTH SUNSHINE REQUEST ON OCTOBER 13, 2021**

802. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

803. Defendants are subject to the requirements of RSMo. Chapter 610.

804. Plaintiffs properly submitted their Sixth Sunshine Request to Defendants seeking various records from Defendants.

805. Plaintiffs' Sixth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

806. Defendants did not immediately provide the requested records within three business days.
807. Defendants stated that they would produce records on November 30, 2021.
808. Defendants did not produce records on November 30, 2021.
809. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.
810. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.
811. Defendants violated RSMo. Chapter 610.
812. Defendants are aware of the requirements of RSMo. Chapter 610.
813. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.
814. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Sixth Sunshine Request.
815. Defendants knowingly violated RSMo. Chapter 610.
816. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

817. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

818. Defendants purposely violated RSMo. Chapter 610.

819. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XLII: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO RESPOND TO PLAINTIFFS' SIXTH SUNSHINE
REQUEST**

820. Plaintiffs incorporate the preceding paragraphs by reference as if

fully set forth herein.

821. Defendants are subject to the requirements of RSMo. Chapter 610.

822. Plaintiffs properly submitted their Sixth Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

823. Plaintiffs' Sixth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

824. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Sixth Sunshine Request.

825. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to respond to Plaintiffs' Sunshine Request within three business days as required by RSMo. § 610.023.3.

826. Defendants violated RSMo. Chapter 610.

827. Defendants are aware of the requirements of RSMo. Chapter 610.

828. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a response to their Sunshine Request.

829. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Sixth Sunshine Request.

830. Defendants knowingly violated RSMo. Chapter 610.

831. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

832. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

833. Defendants purposely violated RSMo. Chapter 610.

834. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XLIII: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
SIXTH SUNSHINE REQUEST**

835. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

836. Defendants are subject to the requirements of RSMo. Chapter 610.

837. Plaintiffs properly submitted their Sixth Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

838. Plaintiffs' Sixth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

839. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Sixth Sunshine Request.

840. Defendant Custodian of Records for the St. Louis City Division of Corrections, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

841. Defendants violated RSMo. Chapter 610.

842. Defendants are aware of the requirements of RSMo. Chapter 610.

843. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.

844. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Sixth Sunshine Request.

845. Defendants knowingly violated RSMo. Chapter 610.

846. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

847. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

848. Defendants purposely violated RSMo. Chapter 610.

849. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo.

Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XLIV: CUSTODIAN OF RECORDS OF DIVISION OF
CORRECTIONS' VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' SIXTH SUNSHINE REQUEST**

850. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

851. Defendants are subject to the requirements of RSMo. Chapter 610.

852. Plaintiffs properly submitted their Sixth Sunshine Request to Defendant Custodian of Records for the St. Louis City Division of Corrections seeking various records.

853. Plaintiffs' Sixth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

854. Defendant Custodian of Records for the St. Louis City Division of Corrections never responded to Plaintiffs' Sixth Sunshine Request.

855. Defendant Custodian of Records for the St. Louis City Division of

Corrections, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

856. Defendants violated RSMo. Chapter 610.

857. Defendants are aware of the requirements of RSMo. Chapter 610.

858. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

859. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Sixth Sunshine Request.

860. Defendants knowingly violated RSMo. Chapter 610.

861. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

862. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

863. Defendants purposely violated RSMo. Chapter 610.

864. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's

Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNTS WITH RESPECT TO PLAINTIFFS' SEVENTH SUNSHINE
REQUEST**

**COUNT XLV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
SEVENTH SUNSHINE REQUEST ON OCTOBER 13, 2021**

865. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

866. Defendants are subject to the requirements of RSMo. Chapter

610.

867. Plaintiffs properly submitted their Seventh Sunshine Request to Defendants seeking various records from Defendants.

868. Plaintiffs' Seventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

869. Defendants did not immediately provide the requested records within three business days.

870. Defendants stated that they would produce records on November 29, 2021.

871. Defendants did not produce records on November 29, 2021.

872. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

873. Defendants violated RSMo. Chapter 610.

874. Defendants are aware of the requirements of RSMo. Chapter 610.

875. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

876. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Seventh Sunshine Request.

877. Defendants knowingly violated RSMo. Chapter 610.

878. Defendants violated RSMo. Chapter 610 as part of a practice by

which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

879. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

880. Defendants purposely violated RSMo. Chapter 610.

881. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

882. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

883. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and

reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XLVI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' SEVENTH SUNSHINE REQUEST ON OCTOBER 13,
2021**

884. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

885. Defendants are subject to the requirements of RSMo. Chapter 610.

886. Plaintiffs properly submitted their Seventh Sunshine Request to Defendants seeking various records from Defendants.

887. Plaintiffs' Seventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

888. Defendants did not immediately provide the requested records within three business days.

889. Defendants stated that they would produce records on November 29, 2021.

890. Defendants did not produce records on November 29, 2021.

891. Defendants did not provide a detailed explanation of the cause for

delaying the production of public records requested by Plaintiffs.

892. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

893. Defendants violated RSMo. Chapter 610.

894. Defendants are aware of the requirements of RSMo. Chapter 610.

895. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

896. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Seventh Sunshine Request.

897. Defendants knowingly violated RSMo. Chapter 610.

898. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

899. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

900. Defendants purposely violated RSMo. Chapter 610.

901. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's

Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XLVII: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO RESPOND TO PLAINTIFFS' SEVENTH SUNSHINE
REQUEST**

902. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

903. Defendants are subject to the requirements of RSMo. Chapter 610.

904. Plaintiffs properly submitted their Seventh Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.

905. Plaintiffs' Seventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.
906. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Seventh Sunshine Request.
907. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to respond to Plaintiffs' Sunshine Request within three business days as required by RSMo. § 610.023.3.
908. Defendants violated RSMo. Chapter 610.
909. Defendants are aware of the requirements of RSMo. Chapter 610.
910. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a response to their Sunshine Request.
911. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Seventh Sunshine Request.
912. Defendants knowingly violated RSMo. Chapter 610.
913. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
914. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

915. Defendants purposely violated RSMo. Chapter 610.

916. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XLVIII: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
SEVENTH SUNSHINE REQUEST**

917. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

918. Defendants are subject to the requirements of RSMo. Chapter 610.
919. Plaintiffs properly submitted their Seventh Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.
920. Plaintiffs' Seventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.
921. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Seventh Sunshine Request.
922. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
923. Defendants violated RSMo. Chapter 610.
924. Defendants are aware of the requirements of RSMo. Chapter 610.
925. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.
926. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Seventh Sunshine Request.

927. Defendants knowingly violated RSMo. Chapter 610.

928. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

929. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

930. Defendants purposely violated RSMo. Chapter 610.

931. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XLIX: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' SEVENTH SUNSHINE REQUEST**

932. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

933. Defendants are subject to the requirements of RSMo. Chapter 610.

934. Plaintiffs properly submitted their Seventh Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.

935. Plaintiffs' Seventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

936. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Seventh Sunshine Request.

937. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

938. Defendants violated RSMo. Chapter 610.

939. Defendants are aware of the requirements of RSMo. Chapter 610.

940. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

941. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Seventh Sunshine Request.

942. Defendants knowingly violated RSMo. Chapter 610.

943. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

944. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

945. Defendants purposely violated RSMo. Chapter 610.

946. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the

amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNTS WITH RESPECT TO PLAINTIFFS' EIGHTH SUNSHINE
REQUEST**

**COUNT L: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON OCTOBER 13, 2021**

947. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

948. Defendants are subject to the requirements of RSMo. Chapter 610.

949. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

950. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

951. Defendants did not immediately provide the requested records within three business days.

952. Defendants stated that they would produce records on November 22, 2021.

953. Defendants did not produce records on November 22, 2021.

954. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

955. Defendants violated RSMo. Chapter 610.

956. Defendants are aware of the requirements of RSMo. Chapter 610.

957. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

958. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

959. Defendants knowingly violated RSMo. Chapter 610.

960. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

961. Defendants were aware of the probable consequences of violating

RSMo. Chapter 610.

962. Defendants purposely violated RSMo. Chapter 610.

963. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

964. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

965. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE**

**CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON OCTOBER 13, 2021**

966. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

967. Defendants are subject to the requirements of RSMo. Chapter 610.

968. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

969. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

970. Defendants did not immediately provide the requested records within three business days.

971. Defendants stated that they would produce records on November 22, 2021.

972. Defendants did not produce records on November 22, 2021.

973. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

974. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

975. Defendants violated RSMo. Chapter 610.

976. Defendants are aware of the requirements of RSMo. Chapter 610.

977. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

978. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

979. Defendants knowingly violated RSMo. Chapter 610.

980. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

981. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

982. Defendants purposely violated RSMo. Chapter 610.

983. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue

an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON NOVEMBER 22, 2021**

984. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

985. Defendants are subject to the requirements of RSMo. Chapter 610.

986. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

987. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

988. Defendants did not immediately provide the requested records within three business days.

989. Defendants stated that they would produce records on December 30, 2021.

990. Defendants did not produce records on December 30, 2021.
991. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.
992. Defendants violated RSMo. Chapter 610.
993. Defendants are aware of the requirements of RSMo. Chapter 610.
994. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.
995. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.
996. Defendants knowingly violated RSMo. Chapter 610.
997. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
998. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
999. Defendants purposely violated RSMo. Chapter 610.
1000. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.
1001. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1002. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON NOVEMBER 22,
2021**

1003. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1004. Defendants are subject to the requirements of RSMo. Chapter

610.

1005. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1006. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1007. Defendants did not immediately provide the requested records within three business days.

1008. Defendants stated that they would produce records on December 30, 2021.

1009. Defendants did not produce records on December 30, 2021.

1010. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1011. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1012. Defendants violated RSMo. Chapter 610.

1013. Defendants are aware of the requirements of RSMo. Chapter 610.

1014. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1015. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1016. Defendants knowingly violated RSMo. Chapter 610.

1017. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1018. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1019. Defendants purposely violated RSMo. Chapter 610.

1020. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT LIV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON DECEMBER 30, 2021

1021. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1022. Defendants are subject to the requirements of RSMo. Chapter 610.

1023. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1024. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1025. Defendants did not immediately provide the requested records within three business days.

1026. Defendants stated that they would produce records on January 28, 2022.

1027. Defendants did not produce records on January 28, 2022.

1028. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1029. Defendants violated RSMo. Chapter 610.

1030. Defendants are aware of the requirements of RSMo. Chapter 610.

1031. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.
1032. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.
1033. Defendants knowingly violated RSMo. Chapter 610.
1034. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
1035. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
1036. Defendants purposely violated RSMo. Chapter 610.
1037. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.
1038. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.
1039. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON DECEMBER 30,**

2021

1040. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1041. Defendants are subject to the requirements of RSMo. Chapter 610.

1042. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1043. Plaintiffs' Eighth Sunshine Request sought public records subject

to disclosure under Missouri Revised Statutes Chapter 610.

1044. Defendants did not immediately provide the requested records within three business days.

1045. Defendants stated that they would produce records on January 28, 2022.

1046. Defendants did not produce records on January 28, 2022.

1047. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1048. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1049. Defendants violated RSMo. Chapter 610.

1050. Defendants are aware of the requirements of RSMo. Chapter 610.

1051. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1052. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1053. Defendants knowingly violated RSMo. Chapter 610.

1054. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production

of public records in violation of the Sunshine Law.

1055. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1056. Defendants purposely violated RSMo. Chapter 610.

1057. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT LVI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON JANUARY 28, 2022

1058. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1059. Defendants are subject to the requirements of RSMo. Chapter 610.

1060. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1061. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1062. Defendants did not immediately provide the requested records within three business days.

1063. Defendants stated that they would produce records on March 7, 2022.

1064. Defendants did not produce records on March 7, 2022.

1065. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1066. Defendants violated RSMo. Chapter 610.

1067. Defendants are aware of the requirements of RSMo. Chapter 610.

1068. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1069. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1070. Defendants knowingly violated RSMo. Chapter 610.

1071. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1072. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1073. Defendants purposely violated RSMo. Chapter 610.

1074. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1075. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1076. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo.

Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LVII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON JANUARY 28, 2022**

1077. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1078. Defendants are subject to the requirements of RSMo. Chapter 610.

1079. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1080. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1081. Defendants did not immediately provide the requested records within three business days.

1082. Defendants stated that they would produce records on March 7, 2022.

1083. Defendants did not produce records on March 7, 2022.

1084. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1085. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1086. Defendants violated RSMo. Chapter 610.

1087. Defendants are aware of the requirements of RSMo. Chapter 610.

1088. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1089. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1090. Defendants knowingly violated RSMo. Chapter 610.

1091. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1092. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1093. Defendants purposely violated RSMo. Chapter 610.

1094. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public

records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LVIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON MARCH 7, 2022**

1095. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1096. Defendants are subject to the requirements of RSMo. Chapter 610.

1097. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1098. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1099. Defendants did not immediately provide the requested records within three business days.

1100. Defendants stated that they would produce records on April 8, 2022.

1101. Defendants did not produce records on April 8, 2022.

1102. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1103. Defendants violated RSMo. Chapter 610.

1104. Defendants are aware of the requirements of RSMo. Chapter 610.

1105. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1106. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1107. Defendants knowingly violated RSMo. Chapter 610.

1108. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1109. Defendants were aware of the probable consequences of violating

RSMo. Chapter 610.

1110. Defendants purposely violated RSMo. Chapter 610.

1111. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1112. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1113. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LIX: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE**

**CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON MARCH 7, 2022**

1114. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1115. Defendants are subject to the requirements of RSMo. Chapter 610.

1116. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1117. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1118. Defendants did not immediately provide the requested records within three business days.

1119. Defendants stated that they would produce records on April 8, 2022.

1120. Defendants did not produce records on April 8, 2022.

1121. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1122. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1123. Defendants violated RSMo. Chapter 610.

1124. Defendants are aware of the requirements of RSMo. Chapter 610.

1125. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1126. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1127. Defendants knowingly violated RSMo. Chapter 610.

1128. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1129. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1130. Defendants purposely violated RSMo. Chapter 610.

1131. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue

an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LX: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON APRIL 8, 2022**

1132. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1133. Defendants are subject to the requirements of RSMo. Chapter 610.

1134. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1135. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1136. Defendants did not immediately provide the requested records within three business days.

1137. Defendants stated that they would produce records on May 6, 2022.

1138. Defendants did not produce records on May 6, 2022.

1139. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1140. Defendants violated RSMo. Chapter 610.

1141. Defendants are aware of the requirements of RSMo. Chapter 610.

1142. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1143. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1144. Defendants knowingly violated RSMo. Chapter 610.

1145. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1146. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1147. Defendants purposely violated RSMo. Chapter 610.

1148. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1149. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1150. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON APRIL 8, 2022**

1151. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1152. Defendants are subject to the requirements of RSMo. Chapter 610.

1153. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1154. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1155. Defendants did not immediately provide the requested records within three business days.

1156. Defendants stated that they would produce records on May 6, 2022.

1157. Defendants did not produce records on May 6, 2022.

1158. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1159. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1160. Defendants violated RSMo. Chapter 610.

1161. Defendants are aware of the requirements of RSMo. Chapter 610.

1162. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1163. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1164. Defendants knowingly violated RSMo. Chapter 610.

1165. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1166. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1167. Defendants purposely violated RSMo. Chapter 610.

1168. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT LXII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON MAY 6, 2022

1169. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1170. Defendants are subject to the requirements of RSMo. Chapter 610.

1171. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1172. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1173. Defendants did not immediately provide the requested records within three business days.

1174. Defendants stated that they would produce records on June 7, 2022.

1175. Defendants did not produce records on June 7, 2022.

1176. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1177. Defendants violated RSMo. Chapter 610.

1178. Defendants are aware of the requirements of RSMo. Chapter 610.

1179. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.
1180. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.
1181. Defendants knowingly violated RSMo. Chapter 610.
1182. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
1183. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
1184. Defendants purposely violated RSMo. Chapter 610.
1185. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.
1186. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.
1187. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON MAY 6, 2022**

1188. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1189. Defendants are subject to the requirements of RSMo. Chapter 610.

1190. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1191. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1192. Defendants did not immediately provide the requested records within three business days.

1193. Defendants stated that they would produce records on June 7, 2022.

1194. Defendants did not produce records on June 7, 2022.

1195. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1196. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1197. Defendants violated RSMo. Chapter 610.

1198. Defendants are aware of the requirements of RSMo. Chapter 610.

1199. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1200. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1201. Defendants knowingly violated RSMo. Chapter 610.

1202. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1203. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1204. Defendants purposely violated RSMo. Chapter 610.

1205. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXIV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON JUNE 7, 2022**

1206. Plaintiffs incorporate the preceding paragraphs by reference as if

fully set forth herein.

1207. Defendants are subject to the requirements of RSMo. Chapter 610.

1208. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1209. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1210. Defendants did not immediately provide the requested records within three business days.

1211. Defendants stated that they would produce records on July 6, 2022.

1212. Defendants did not produce records on July 6, 2022.

1213. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1214. Defendants violated RSMo. Chapter 610.

1215. Defendants are aware of the requirements of RSMo. Chapter 610.

1216. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1217. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1218. Defendants knowingly violated RSMo. Chapter 610.

1219. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1220. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1221. Defendants purposely violated RSMo. Chapter 610.

1222. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1223. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1224. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending

production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON JUNE 7, 2022**

1225. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1226. Defendants are subject to the requirements of RSMo. Chapter 610.

1227. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1228. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1229. Defendants did not immediately provide the requested records within three business days.

1230. Defendants stated that they would produce records on July 6, 2022.

1231. Defendants did not produce records on July 6, 2022.

1232. Defendants did not provide a detailed explanation of the cause for

delaying the production of public records requested by Plaintiffs.

1233. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1234. Defendants violated RSMo. Chapter 610.

1235. Defendants are aware of the requirements of RSMo. Chapter 610.

1236. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1237. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1238. Defendants knowingly violated RSMo. Chapter 610.

1239. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1240. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1241. Defendants purposely violated RSMo. Chapter 610.

1242. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's

Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXVI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON JULY 6, 2022**

1243. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1244. Defendants are subject to the requirements of RSMo. Chapter 610.

1245. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1246. Plaintiffs' Eighth Sunshine Request sought public records subject

to disclosure under RSMo. Chapter 610.

1247. Defendants did not immediately provide the requested records within three business days.

1248. Defendants stated that they would produce records on August 8, 2022.

1249. Defendants did not produce records on August 8, 2022.

1250. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1251. Defendants violated RSMo. Chapter 610.

1252. Defendants are aware of the requirements of RSMo. Chapter 610.

1253. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1254. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1255. Defendants knowingly violated RSMo. Chapter 610.

1256. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1257. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1258. Defendants purposely violated RSMo. Chapter 610.

1259. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1260. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1261. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXVII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE**

**CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON JULY 6, 2022**

1262. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1263. Defendants are subject to the requirements of RSMo. Chapter 610.

1264. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1265. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1266. Defendants did not immediately provide the requested records within three business days.

1267. Defendants stated that they would produce records on August 8, 2022.

1268. Defendants did not produce records on August 8, 2022.

1269. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1270. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1271. Defendants violated RSMo. Chapter 610.

1272. Defendants are aware of the requirements of RSMo. Chapter 610.

1273. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1274. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1275. Defendants knowingly violated RSMo. Chapter 610.

1276. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1277. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1278. Defendants purposely violated RSMo. Chapter 610.

1279. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue

an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT LXVIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST ON AUGUST 8, 2022

1280. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1281. Defendants are subject to the requirements of RSMo. Chapter 610.

1282. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1283. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1284. Defendants did not immediately provide the requested records within three business days.

1285. Defendants stated that they would produce records on September 8, 2022.

1286. Defendants did not produce records on September 8, 2022.

1287. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1288. Defendants violated RSMo. Chapter 610.

1289. Defendants are aware of the requirements of RSMo. Chapter 610.

1290. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1291. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1292. Defendants knowingly violated RSMo. Chapter 610.

1293. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1294. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1295. Defendants purposely violated RSMo. Chapter 610.

1296. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1297. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1298. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXIX: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST ON AUGUST 8, 2022**

1299. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1300. Defendants are subject to the requirements of RSMo. Chapter 610.

1301. Plaintiffs properly submitted their Eighth Sunshine Request to Defendants seeking various records from Defendants.

1302. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1303. Defendants did not immediately provide the requested records within three business days.

1304. Defendants stated that they would produce records on September 8, 2022.

1305. Defendants did not produce records on September 8, 2022.

1306. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1307. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1308. Defendants violated RSMo. Chapter 610.

1309. Defendants are aware of the requirements of RSMo. Chapter 610.

1310. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1311. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1312. Defendants knowingly violated RSMo. Chapter 610.

1313. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1314. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1315. Defendants purposely violated RSMo. Chapter 610.

1316. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXX: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO RESPOND TO PLAINTIFFS' EIGHTH SUNSHINE
REQUEST**

1317. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1318. Defendants are subject to the requirements of RSMo. Chapter 610.

1319. Plaintiffs properly submitted their Eighth Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.

1320. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1321. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Eighth Sunshine Request.

1322. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to respond to Plaintiffs' Sunshine Request within three business days as required by RSMo. § 610.023.3.

1323. Defendants violated RSMo. Chapter 610.

1324. Defendants are aware of the requirements of RSMo. Chapter 610.

1325. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a response to their Sunshine Request.

1326. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1327. Defendants knowingly violated RSMo. Chapter 610.

1328. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1329. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1330. Defendants purposely violated RSMo. Chapter 610.

1331. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo.

Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXXI: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
EIGHTH SUNSHINE REQUEST**

1332. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1333. Defendants are subject to the requirements of RSMo. Chapter 610.

1334. Plaintiffs properly submitted their Eighth Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.

1335. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1336. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Eighth Sunshine Request.

1337. Defendant Custodian of Records for the St. Louis City

Department of Public Safety, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1338. Defendants violated RSMo. Chapter 610.

1339. Defendants are aware of the requirements of RSMo. Chapter 610.

1340. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.

1341. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1342. Defendants knowingly violated RSMo. Chapter 610.

1343. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1344. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1345. Defendants purposely violated RSMo. Chapter 610.

1346. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's

Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXXII: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' EIGHTH SUNSHINE REQUEST**

1347. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1348. Defendants are subject to the requirements of RSMo. Chapter 610.

1349. Plaintiffs properly submitted their Eighth Sunshine Request to Defendant Custodian of Records for the St. Louis City Department

of Public Safety seeking various records.

1350. Plaintiffs' Eighth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1351. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Eighth Sunshine Request.

1352. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1353. Defendants violated RSMo. Chapter 610.

1354. Defendants are aware of the requirements of RSMo. Chapter 610.

1355. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1356. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Eighth Sunshine Request.

1357. Defendants knowingly violated RSMo. Chapter 610.

1358. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production

of public records in violation of the Sunshine Law.

1359. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1360. Defendants purposely violated RSMo. Chapter 610.

1361. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNTS WITH RESPECT TO PLAINTIFFS' TENTH SUNSHINE
REQUEST**

**COUNT LXXIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE PLAINTIFFS WITH RECORDS STORED IN
THEIR NATIVE ELECTRONIC FORMAT REQUESTED IN HIS
TENTH SUNSHINE REQUEST**

1362. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1363. Defendants are subject to the requirements of RSMo. Chapter 610.

1364. Plaintiffs properly submitted their Tenth Sunshine Request to Defendants seeking various records from Defendants.

1365. Plaintiffs' Tenth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1366. Plaintiffs requested the public records be produced in their original native electronic format along with their metadata.

1367. The requested public records are stored as personal storage table, or "pst," files.

1368. Instead of producing the requested records in their native electronic pst file format, Defendants would not provide Plaintiffs with the requested records unless Plaintiffs paid a fee for the records to be converted to portable document format, or "PDF," files.

1369. Defendants, therefore, failed to provide the records requested in

the requested format despite their availability as required by RSMo.
§ 610.023.3.

1370. Defendants violated RSMo. Chapter 610.

1371. Defendants are aware of the requirements of RSMo. Chapter 610.

1372. Defendants knew that they were required by the Sunshine Law
to provide Plaintiffs with public records in the available format he
requested.

1373. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Tenth Sunshine Request.

1374. Defendants knowingly violated RSMo. Chapter 610.

1375. Defendants violated RSMo. Chapter 610 as part of a practice by
which the City of St. Louis and Defendants delay or deny production
of public records in violation of the Sunshine Law.

1376. Defendants were aware of the probable consequences of violating
RSMo. Chapter 610.

1377. Defendants purposely violated RSMo. Chapter 610.

1378. As a direct and proximate result of Defendants' actions, Plaintiffs
have been denied access or have received delayed access to public
records and have undertaken substantial costs to enforce Missouri's
Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXXIV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
CHARGING PLAINTIFFS IMPROPER FEES TO ACCESS RECORDS
REQUESTED IN HIS TENTH SUNSHINE REQUEST**

1379. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1380. Defendants are subject to the requirements of RSMo. Chapter 610.

1381. Plaintiffs properly submitted their Tenth Sunshine Request to Defendants seeking various records from Defendants.

1382. Plaintiffs' Tenth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1383. Plaintiffs requested the public records be produced in their

original native electronic format along with their metadata.

1384. The requested public records are stored as personal storage table, or “pst,” files.

1385. Instead of producing the requested records in their native electronic pst file format, Defendants would not provide Plaintiffs with the requested records unless Plaintiffs paid a fee for the records to be converted to portable document format, or “PDF,” files.

1386. Defendants claimed that the process to convert pst files to PDF files would take multiple hours when in fact the process to convert the number of pst files involved to PDF files takes only a few minutes.

1387. Defendants, therefore, charged Plaintiffs unnecessary and unauthorized fees to access electronically stored public records in violation of RSMo. § 610.026.2.

1388. Defendants violated RSMo. Chapter 610.

1389. Defendants are aware of the requirements of RSMo. Chapter 610.

1390. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with public records in the available format he requested.

1391. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs’ Tenth Sunshine Request.

1392. Defendants knowingly violated RSMo. Chapter 610.

1393. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1394. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1395. Defendants purposely violated RSMo. Chapter 610.

1396. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXXV: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO RESPOND TO PLAINTIFFS' TENTH SUNSHINE
REQUEST**

1397. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1398. Defendants are subject to the requirements of RSMo. Chapter 610.

1399. Plaintiffs properly submitted their Tenth Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.

1400. Plaintiffs' Tenth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1401. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Tenth Sunshine Request.

1402. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to respond to Plaintiffs' Sunshine Request within three business days as required by RSMo. § 610.023.3.

1403. Defendants violated RSMo. Chapter 610.

1404. Defendants are aware of the requirements of RSMo. Chapter 610.

1405. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a response to their Sunshine Request.

1406. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Tenth Sunshine Request.

1407. Defendants knowingly violated RSMo. Chapter 610.

1408. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1409. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1410. Defendants purposely violated RSMo. Chapter 610.

1411. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo.

Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXXVI: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
TENTH SUNSHINE REQUEST**

1412. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1413. Defendants are subject to the requirements of RSMo. Chapter 610.

1414. Plaintiffs properly submitted their Tenth Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.

1415. Plaintiffs' Tenth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1416. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Tenth Sunshine Request.

1417. Defendant Custodian of Records for the St. Louis City

Department of Public Safety, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1418. Defendants violated RSMo. Chapter 610.

1419. Defendants are aware of the requirements of RSMo. Chapter 610.

1420. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.

1421. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Tenth Sunshine Request.

1422. Defendants knowingly violated RSMo. Chapter 610.

1423. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1424. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1425. Defendants purposely violated RSMo. Chapter 610.

1426. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's

Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXXVII: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' TENTH SUNSHINE REQUEST**

1427. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1428. Defendants are subject to the requirements of RSMo. Chapter 610.

1429. Plaintiffs properly submitted their Tenth Sunshine Request to Defendant Custodian of Records for the St. Louis City Department

of Public Safety seeking various records.

1430. Plaintiffs' Tenth Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1431. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Tenth Sunshine Request.

1432. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1433. Defendants violated RSMo. Chapter 610.

1434. Defendants are aware of the requirements of RSMo. Chapter 610.

1435. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1436. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Tenth Sunshine Request.

1437. Defendants knowingly violated RSMo. Chapter 610.

1438. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production

of public records in violation of the Sunshine Law.

1439. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1440. Defendants purposely violated RSMo. Chapter 610.

1441. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNTS WITH RESPECT TO PLAINTIFFS' ELEVENTH SUNSHINE
REQUEST**

COUNT LXXVIII: VIOLATION OF THE MISSOURI SUNSHINE LAW

BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME

AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'

ELEVENTH SUNSHINE REQUEST ON OCTOBER 13, 2021

1442. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1443. Defendants are subject to the requirements of RSMo. Chapter 610.

1444. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1445. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1446. Defendants did not immediately provide the requested records within three business days.

1447. Defendants stated that they would produce records on November 15, 2021.

1448. Defendants did not produce records on November 15, 2021.

1449. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1450. Defendants violated RSMo. Chapter 610.

1451. Defendants are aware of the requirements of RSMo. Chapter 610.

1452. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.
1453. Defendants refused to abide by the requirements of RSMo. Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.
1454. Defendants knowingly violated RSMo. Chapter 610.
1455. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.
1456. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.
1457. Defendants purposely violated RSMo. Chapter 610.
1458. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.
1459. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.
1460. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT LXXIX: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON OCTOBER 13,**

2021

1461. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1462. Defendants are subject to the requirements of RSMo. Chapter 610.

1463. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1464. Plaintiffs' Eleventh Sunshine Request sought public records

subject to disclosure under Missouri Revised Statutes Chapter 610.

1465. Defendants did not immediately provide the requested records within three business days.

1466. Defendants stated that they would produce records on November 15, 2021.

1467. Defendants did not produce records on November 15, 2021.

1468. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1469. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1470. Defendants violated RSMo. Chapter 610.

1471. Defendants are aware of the requirements of RSMo. Chapter 610.

1472. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1473. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1474. Defendants knowingly violated RSMo. Chapter 610.

1475. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production

of public records in violation of the Sunshine Law.

1476. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1477. Defendants purposely violated RSMo. Chapter 610.

1478. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT XXXX: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST ON NOVEMBER 15, 2021

1479. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1480. Defendants are subject to the requirements of RSMo. Chapter 610.

1481. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1482. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1483. Defendants did not immediately provide the requested records within three business days.

1484. Defendants stated that they would produce records on December 15, 2021.

1485. Defendants did not produce records on December 15, 2021.

1486. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1487. Defendants violated RSMo. Chapter 610.

1488. Defendants are aware of the requirements of RSMo. Chapter 610.

1489. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1490. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1491. Defendants knowingly violated RSMo. Chapter 610.

1492. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1493. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1494. Defendants purposely violated RSMo. Chapter 610.

1495. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1496. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1497. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo.

Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXXI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON NOVEMBER 15,**

2021

1498. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1499. Defendants are subject to the requirements of RSMo. Chapter 610.

1500. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1501. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1502. Defendants did not immediately provide the requested records within three business days.

1503. Defendants stated that they would produce records on December 15, 2021.

1504. Defendants did not produce records on December 15, 2021.

1505. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1506. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1507. Defendants violated RSMo. Chapter 610.

1508. Defendants are aware of the requirements of RSMo. Chapter 610.

1509. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1510. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1511. Defendants knowingly violated RSMo. Chapter 610.

1512. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1513. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1514. Defendants purposely violated RSMo. Chapter 610.

1515. As a direct and proximate result of Defendants' actions, Plaintiffs

have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT XXXXII: VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST ON DECEMBER 15, 2021

1516. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1517. Defendants are subject to the requirements of RSMo. Chapter 610.

1518. Plaintiffs properly submitted their Eleventh Sunshine Request to

Defendants seeking various records from Defendants.

1519. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1520. Defendants did not immediately provide the requested records within three business days.

1521. Defendants stated that they would produce records on January 7, 2022.

1522. Defendants did not produce records on January 7, 2022.

1523. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1524. Defendants violated RSMo. Chapter 610.

1525. Defendants are aware of the requirements of RSMo. Chapter 610.

1526. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1527. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1528. Defendants knowingly violated RSMo. Chapter 610.

1529. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1530. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1531. Defendants purposely violated RSMo. Chapter 610.

1532. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1533. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1534. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT XXXXIII: VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON DECEMBER 15,

2021

1535. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1536. Defendants are subject to the requirements of RSMo. Chapter 610.

1537. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1538. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1539. Defendants did not immediately provide the requested records within three business days.

1540. Defendants stated that they would produce records on January 7, 2022.

1541. Defendants did not produce records on January 7, 2022.

1542. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1543. Defendants, therefore, failed to provide a detailed explanation of

the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1544. Defendants violated RSMo. Chapter 610.

1545. Defendants are aware of the requirements of RSMo. Chapter 610.

1546. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1547. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1548. Defendants knowingly violated RSMo. Chapter 610.

1549. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1550. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1551. Defendants purposely violated RSMo. Chapter 610.

1552. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT XXXIV: VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST ON JANUARY 7, 2022

1553. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1554. Defendants are subject to the requirements of RSMo. Chapter 610.

1555. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1556. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1557. Defendants did not immediately provide the requested records within three business days.

1558. Defendants stated that they would produce records on February 3, 2022.

1559. Defendants did not produce records on February 3, 2022.

1560. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1561. Defendants violated RSMo. Chapter 610.

1562. Defendants are aware of the requirements of RSMo. Chapter 610.

1563. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1564. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1565. Defendants knowingly violated RSMo. Chapter 610.

1566. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1567. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1568. Defendants purposely violated RSMo. Chapter 610.

1569. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1570. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1571. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXXV: VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR**

PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON JANUARY 7,

2022

1572. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1573. Defendants are subject to the requirements of RSMo. Chapter 610.

1574. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1575. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1576. Defendants did not immediately provide the requested records within three business days.

1577. Defendants stated that they would produce records on February 3, 2022.

1578. Defendants did not produce records on February 3, 2022.

1579. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1580. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1581. Defendants violated RSMo. Chapter 610.

1582. Defendants are aware of the requirements of RSMo. Chapter 610.

1583. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1584. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1585. Defendants knowingly violated RSMo. Chapter 610.

1586. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1587. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1588. Defendants purposely violated RSMo. Chapter 610.

1589. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue

an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT XXXXVI: VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST ON FEBRUARY 3, 2022

1590. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1591. Defendants are subject to the requirements of RSMo. Chapter 610.

1592. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1593. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1594. Defendants did not immediately provide the requested records within three business days.

1595. Defendants stated that they would produce records on March 3, 2022..

1596. Defendants did not produce records on March 3, 2022.

1597. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1598. Defendants violated RSMo. Chapter 610.

1599. Defendants are aware of the requirements of RSMo. Chapter 610.

1600. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1601. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1602. Defendants knowingly violated RSMo. Chapter 610.

1603. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1604. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1605. Defendants purposely violated RSMo. Chapter 610.

1606. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1607. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1608. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXXVII: VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON FEBRUARY 3,**

2022

1609. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1610. Defendants are subject to the requirements of RSMo. Chapter

610.

1611. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1612. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1613. Defendants did not immediately provide the requested records within three business days.

1614. Defendants stated that they would produce records on March 3, 2022.

1615. Defendants did not produce records on March 3, 2022.

1616. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1617. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1618. Defendants violated RSMo. Chapter 610.

1619. Defendants are aware of the requirements of RSMo. Chapter 610.

1620. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1621. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1622. Defendants knowingly violated RSMo. Chapter 610.

1623. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1624. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1625. Defendants purposely violated RSMo. Chapter 610.

1626. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT XXXXVIII: VIOLATION OF THE MISSOURI SUNSHINE LAW

BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME

AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'

ELEVENTH SUNSHINE REQUEST ON MARCH 3, 2022

1627. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1628. Defendants are subject to the requirements of RSMo. Chapter 610.

1629. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1630. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1631. Defendants did not immediately provide the requested records within three business days.

1632. Defendants stated that they would produce records on April 1, 2022.

1633. Defendants did not produce records on April 1, 2022.

1634. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1635. Defendants violated RSMo. Chapter 610.

1636. Defendants are aware of the requirements of RSMo. Chapter 610.

1637. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1638. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1639. Defendants knowingly violated RSMo. Chapter 610.

1640. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1641. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1642. Defendants purposely violated RSMo. Chapter 610.

1643. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1644. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1645. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XXXIX: VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON MARCH 3, 2022**

1646. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1647. Defendants are subject to the requirements of RSMo. Chapter 610.

1648. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1649. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1650. Defendants did not immediately provide the requested records within three business days.

1651. Defendants stated that they would produce records on April 1, 2022.

1652. Defendants did not produce records on April 1, 2022.

1653. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1654. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1655. Defendants violated RSMo. Chapter 610.

1656. Defendants are aware of the requirements of RSMo. Chapter 610.

1657. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1658. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1659. Defendants knowingly violated RSMo. Chapter 610.

1660. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1661. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1662. Defendants purposely violated RSMo. Chapter 610.

1663. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XC: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST ON APRIL 1, 2022**

1664. Plaintiffs incorporate the preceding paragraphs by reference as if

fully set forth herein.

1665. Defendants are subject to the requirements of RSMo. Chapter 610.

1666. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1667. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1668. Defendants did not immediately provide the requested records within three business days.

1669. Defendants stated that they would produce records on April 26, 2022.

1670. Defendants did not produce records on April 26, 2022.

1671. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1672. Defendants violated RSMo. Chapter 610.

1673. Defendants are aware of the requirements of RSMo. Chapter 610.

1674. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1675. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1676. Defendants knowingly violated RSMo. Chapter 610.

1677. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1678. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1679. Defendants purposely violated RSMo. Chapter 610.

1680. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1681. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1682. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending

production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XCI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON APRIL 1, 2022**

1683. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1684. Defendants are subject to the requirements of RSMo. Chapter 610.

1685. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1686. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1687. Defendants did not immediately provide the requested records within three business days.

1688. Defendants stated that they would produce records on April 26, 2022.

1689. Defendants did not produce records on April 26, 2022.

1690. Defendants did not provide a detailed explanation of the cause for

delaying the production of public records requested by Plaintiffs.

1691. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1692. Defendants violated RSMo. Chapter 610.

1693. Defendants are aware of the requirements of RSMo. Chapter 610.

1694. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1695. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1696. Defendants knowingly violated RSMo. Chapter 610.

1697. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1698. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1699. Defendants purposely violated RSMo. Chapter 610.

1700. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's

Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XCII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST ON APRIL 26, 2022**

1701. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1702. Defendants are subject to the requirements of RSMo. Chapter 610.

1703. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1704. Plaintiffs' Eleventh Sunshine Request sought public records

subject to disclosure under RSMo. Chapter 610.

1705. Defendants did not immediately provide the requested records within three business days.

1706. Defendants stated that they would produce records on May 26, 2022.

1707. Defendants did not produce records on May 26, 2022.

1708. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1709. Defendants violated RSMo. Chapter 610.

1710. Defendants are aware of the requirements of RSMo. Chapter 610.

1711. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1712. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1713. Defendants knowingly violated RSMo. Chapter 610.

1714. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1715. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1716. Defendants purposely violated RSMo. Chapter 610.

1717. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1718. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1719. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XCIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE**

**CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON APRIL 26, 2022**

1720. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1721. Defendants are subject to the requirements of RSMo. Chapter 610.

1722. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1723. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1724. Defendants did not immediately provide the requested records within three business days.

1725. Defendants stated that they would produce records on May 26, 2022.

1726. Defendants did not produce records on May 26, 2022.

1727. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1728. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1729. Defendants violated RSMo. Chapter 610.

1730. Defendants are aware of the requirements of RSMo. Chapter 610.

1731. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1732. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1733. Defendants knowingly violated RSMo. Chapter 610.

1734. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1735. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1736. Defendants purposely violated RSMo. Chapter 610.

1737. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue

an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XCIV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST ON MAY 26, 2022**

1738. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1739. Defendants are subject to the requirements of RSMo. Chapter 610.

1740. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1741. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1742. Defendants did not immediately provide the requested records within three business days.

1743. Defendants stated that they would produce records on June 30, 2022.

1744. Defendants did not produce records on June 30, 2022.

1745. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1746. Defendants violated RSMo. Chapter 610.

1747. Defendants are aware of the requirements of RSMo. Chapter 610.

1748. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1749. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1750. Defendants knowingly violated RSMo. Chapter 610.

1751. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1752. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1753. Defendants purposely violated RSMo. Chapter 610.

1754. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1755. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1756. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XCV: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON MAY 26, 2022**

1757. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1758. Defendants are subject to the requirements of RSMo. Chapter 610.

1759. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1760. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1761. Defendants did not immediately provide the requested records within three business days.

1762. Defendants stated that they would produce records on June 30, 2022.

1763. Defendants did not produce records on June 30, 2022.

1764. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1765. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1766. Defendants violated RSMo. Chapter 610.

1767. Defendants are aware of the requirements of RSMo. Chapter 610.

1768. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1769. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1770. Defendants knowingly violated RSMo. Chapter 610.

1771. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1772. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1773. Defendants purposely violated RSMo. Chapter 610.

1774. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT XCVI: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST ON JUNE 30, 2022

1775. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1776. Defendants are subject to the requirements of RSMo. Chapter 610.

1777. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1778. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1779. Defendants did not immediately provide the requested records within three business days.

1780. Defendants stated that they would produce records on July 27, 2022.

1781. Defendants did not produce records on July 27, 2022.

1782. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1783. Defendants violated RSMo. Chapter 610.

1784. Defendants are aware of the requirements of RSMo. Chapter 610.

1785. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1786. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1787. Defendants knowingly violated RSMo. Chapter 610.

1788. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1789. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1790. Defendants purposely violated RSMo. Chapter 610.

1791. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1792. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1793. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XCVII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON JUNE 30, 2022**

1794. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1795. Defendants are subject to the requirements of RSMo. Chapter 610.

1796. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1797. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1798. Defendants did not immediately provide the requested records within three business days.

1799. Defendants stated that they would produce records on July 27, 2022.

1800. Defendants did not produce records on July 27, 2022.

1801. Defendants did not provide a detailed explanation of the cause for delaying the production of public records requested by Plaintiffs.

1802. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1803. Defendants violated RSMo. Chapter 610.

1804. Defendants are aware of the requirements of RSMo. Chapter 610.

1805. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1806. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1807. Defendants knowingly violated RSMo. Chapter 610.

1808. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1809. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1810. Defendants purposely violated RSMo. Chapter 610.

1811. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

COUNT XCVIII: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST ON JULY 27, 2022

1812. Plaintiffs incorporate the preceding paragraphs by reference as if

fully set forth herein.

1813. Defendants are subject to the requirements of RSMo. Chapter 610.

1814. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1815. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under RSMo. Chapter 610.

1816. Defendants did not immediately provide the requested records within three business days.

1817. Defendants stated that they would produce records on August 26, 2022.

1818. Defendants did not produce records on August 26, 2022.

1819. Defendants, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1820. Defendants violated RSMo. Chapter 610.

1821. Defendants are aware of the requirements of RSMo. Chapter 610.

1822. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest time and date the records would be available.

1823. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1824. Defendants knowingly violated RSMo. Chapter 610.

1825. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1826. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1827. Defendants purposely violated RSMo. Chapter 610.

1828. Monetary remedies are likely insufficient to ensure Defendants' compliance with RSMo. Chapter 610.

1829. An injunction is warranted to prevent Defendants from continuing to violate RSMo. Chapter 610.

1830. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending

production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT XCIX: VIOLATION OF THE MISSOURI SUNSHINE LAW BY
FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST ON JULY 27, 2022**

1831. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1832. Defendants are subject to the requirements of RSMo. Chapter 610.

1833. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendants seeking various records from Defendants.

1834. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1835. Defendants did not immediately provide the requested records within three business days.

1836. Defendants stated that they would produce records on August 26, 2022.

1837. Defendants did not produce records on August 26, 2022.

1838. Defendants did not provide a detailed explanation of the cause for

delaying the production of public records requested by Plaintiffs.

1839. Defendants, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1840. Defendants violated RSMo. Chapter 610.

1841. Defendants are aware of the requirements of RSMo. Chapter 610.

1842. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1843. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1844. Defendants knowingly violated RSMo. Chapter 610.

1845. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1846. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1847. Defendants purposely violated RSMo. Chapter 610.

1848. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's

Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT C: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO RESPOND TO PLAINTIFFS' ELEVENTH SUNSHINE
REQUEST**

1849. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1850. Defendants are subject to the requirements of RSMo. Chapter 610.

1851. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.

1852. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1853. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Eleventh Sunshine Request.

1854. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to respond to Plaintiffs' Sunshine Request within three business days as required by RSMo. § 610.023.3.

1855. Defendants violated RSMo. Chapter 610.

1856. Defendants are aware of the requirements of RSMo. Chapter 610.

1857. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a response to their Sunshine Request.

1858. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1859. Defendants knowingly violated RSMo. Chapter 610.

1860. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1861. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1862. Defendants purposely violated RSMo. Chapter 610.

1863. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT CI: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE THE EARLIEST DATE AND TIME
AT WHICH RECORDS WOULD BE AVAILABLE FOR PLAINTIFFS'
ELEVENTH SUNSHINE REQUEST**

1864. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1865. Defendants are subject to the requirements of RSMo. Chapter 610.

1866. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.

1867. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1868. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Eleventh Sunshine Request.

1869. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to provide the earliest time and date the records would be available as required by RSMo. § 610.023.3.

1870. Defendants violated RSMo. Chapter 610.

1871. Defendants are aware of the requirements of RSMo. Chapter 610.

1872. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with the earliest date and time at which records would be available.

1873. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1874. Defendants knowingly violated RSMo. Chapter 610.

1875. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1876. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1877. Defendants purposely violated RSMo. Chapter 610.

1878. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

**COUNT CII: CUSTODIAN OF RECORDS OF DEPARTMENT OF
PUBLIC SAFETY'S VIOLATION OF THE MISSOURI SUNSHINE LAW
BY FAILING TO PROVIDE A DETAILED EXPLANATION OF THE
CAUSE FOR DELAYING PRODUCTION OF PUBLIC RECORDS FOR
PLAINTIFFS' ELEVENTH SUNSHINE REQUEST**

1879. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth herein.

1880. Defendants are subject to the requirements of RSMo. Chapter 610.

1881. Plaintiffs properly submitted their Eleventh Sunshine Request to Defendant Custodian of Records for the St. Louis City Department of Public Safety seeking various records.

1882. Plaintiffs' Eleventh Sunshine Request sought public records subject to disclosure under Missouri Revised Statutes Chapter 610.

1883. Defendant Custodian of Records for the St. Louis City Department of Public Safety never responded to Plaintiffs' Eleventh Sunshine Request.

1884. Defendant Custodian of Records for the St. Louis City Department of Public Safety, therefore, failed to provide a detailed explanation of the cause for delaying the production of public records as required by RSMo. § 610.023.3.

1885. Defendants violated RSMo. Chapter 610.

1886. Defendants are aware of the requirements of RSMo. Chapter 610.

1887. Defendants knew that they were required by the Sunshine Law to provide Plaintiffs with a detailed explanation of the cause for delaying the production of public records.

1888. Defendants refused to abide by the requirements of RSMo.

Chapter 610 with respect to Plaintiffs' Eleventh Sunshine Request.

1889. Defendants knowingly violated RSMo. Chapter 610.

1890. Defendants violated RSMo. Chapter 610 as part of a practice by which the City of St. Louis and Defendants delay or deny production of public records in violation of the Sunshine Law.

1891. Defendants were aware of the probable consequences of violating RSMo. Chapter 610.

1892. Defendants purposely violated RSMo. Chapter 610.

1893. As a direct and proximate result of Defendants' actions, Plaintiffs have been denied access or have received delayed access to public records and have undertaken substantial costs to enforce Missouri's Sunshine Law.

WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor and against Defendants, order Defendants to pay a civil penalty in the

amount of \$1,000.00 pursuant to RSMo. § 610.027, order Defendants to pay a civil penalty in the amount of \$5,000.00 pursuant to RSMo. § 610.027, issue an injunction under RSMo. § 610.030 requiring Defendants to follow RSMo. Chapter 610, order Defendants to produce the records still pending production in 14 days or less, award Plaintiffs costs of litigation and reasonable attorney's fees, and provide other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Elad Gross

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of September, 2022, the foregoing was filed electronically with the Clerk of the Court to be served upon all parties by operation of the Court's electronic filing system.

/s/Elad Gross
Elad Gross
Attorney at Law

CERTIFICATE OF ORIGINAL SIGNATURE

I hereby certify that on this 12th September, 2022, the original of the foregoing document was signed by the attorney of record.

/s/Elad Gross

Elad Gross

Attorney at Law



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