



OPEN MEETING LAW

G.L. c. 30A, §§ 18 – 25

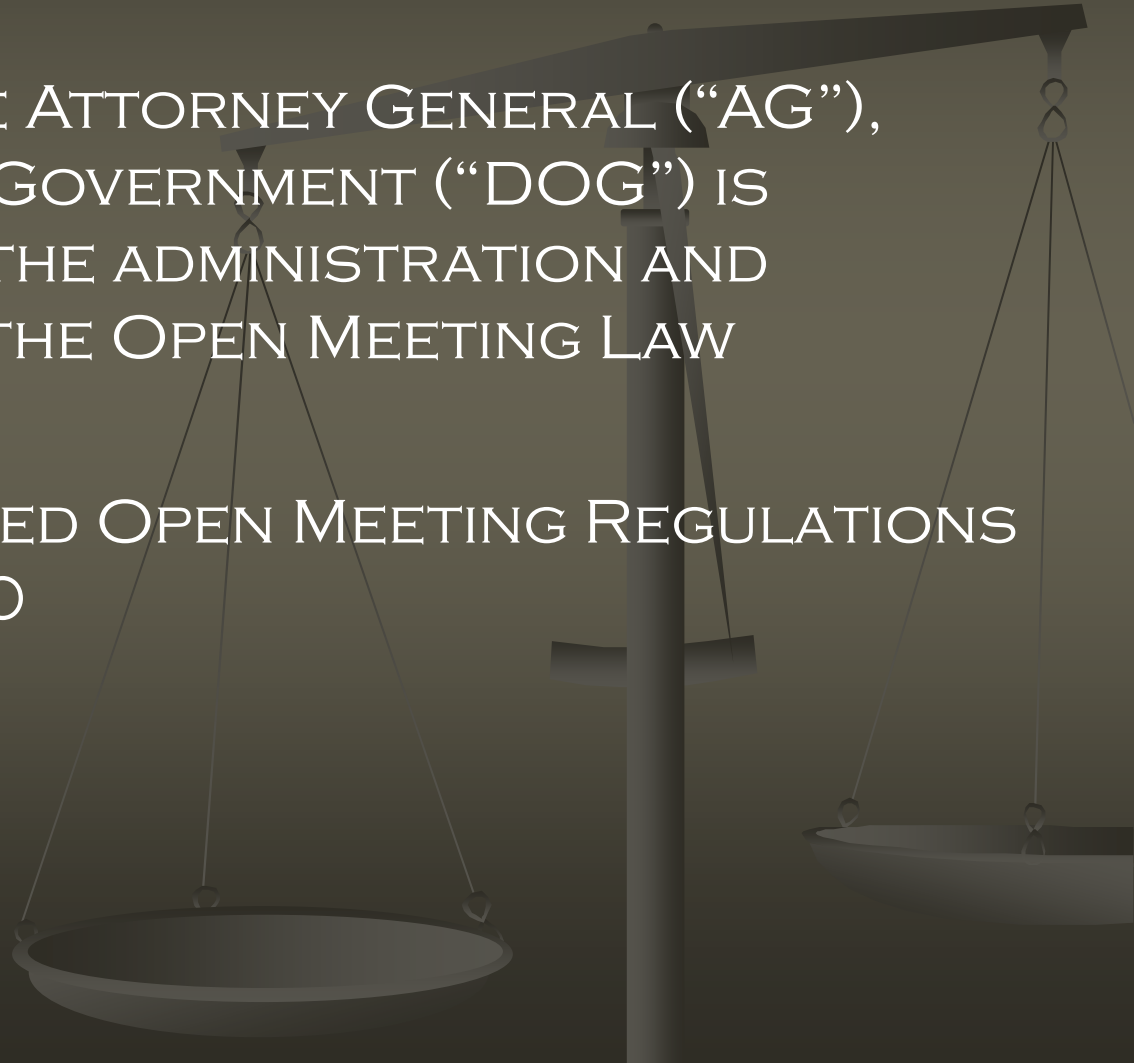
MEAD, TALERMAN & COSTA, LLC

APRIL 25, 2018

OPEN MEETING LAW

ADMINISTRATION

- THE OFFICE OF THE ATTORNEY GENERAL (“AG”), DIVISION OF OPEN GOVERNMENT (“DOG”) IS RESPONSIBLE FOR THE ADMINISTRATION AND ENFORCEMENT OF THE OPEN MEETING LAW
- THE DOG HAS ISSUED OPEN MEETING REGULATIONS AT 940 CMR 29.00



OPEN MEETING LAW

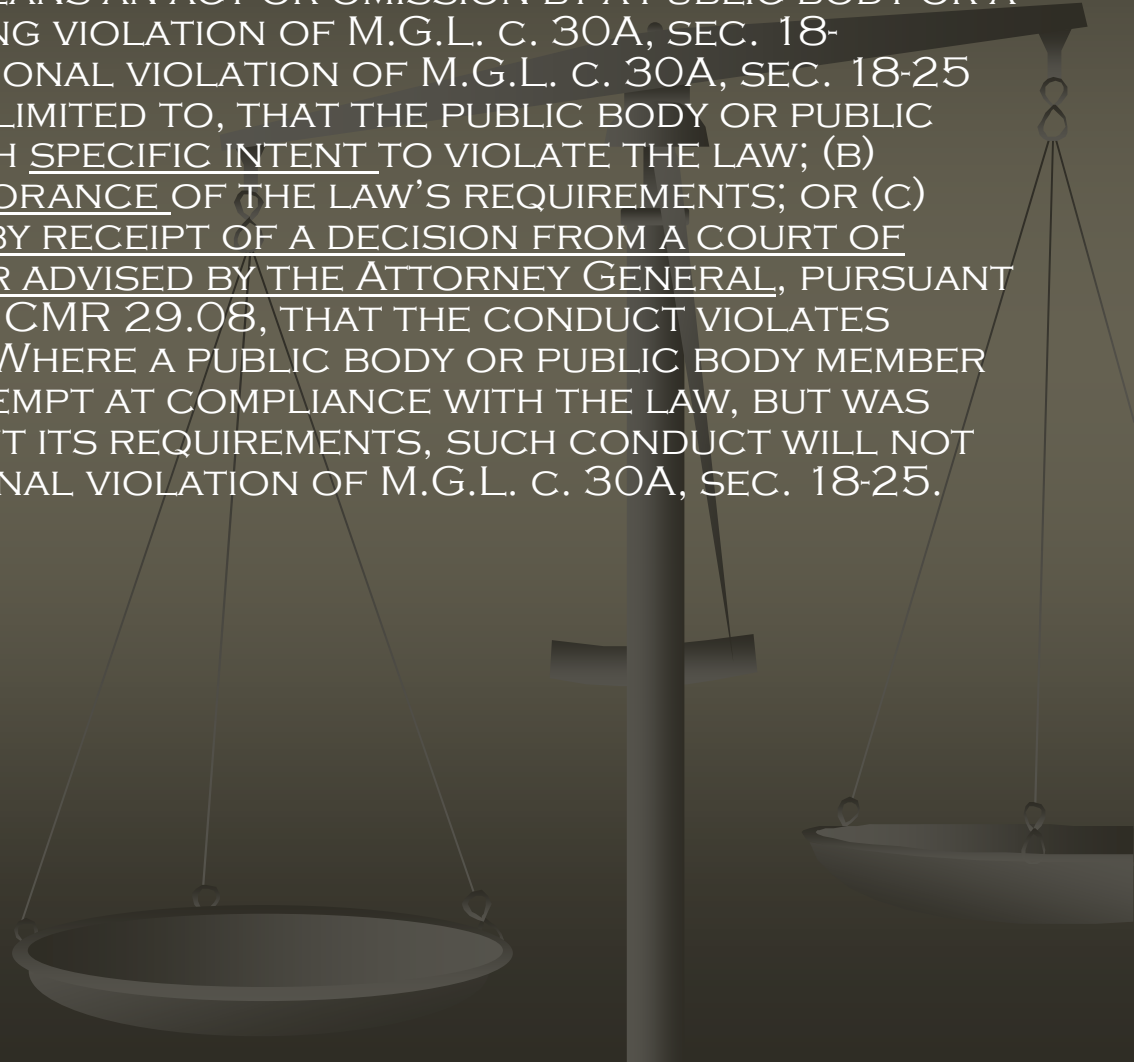
IMPORTANT DEFINITIONS

- “PUBLIC BODY” INCLUDES ALL MULTI MEMBER BOARDS, COMMITTEES, ETC. ESTABLISHED TO SERVE A PUBLIC PURPOSE IN THE TOWN, THIS INCLUDES SUBCOMMITTEES CREATED TO ADVISE OR REPORT TO THE FULL PUBLIC BODY
- “DELIBERATIONS” INCLUDE ANY WRITTEN AND ORAL COMMUNICATION, INCLUDING COMMUNICATION VIA E-MAIL AND/OR OTHER ELECTRONIC MEDIUM, BETWEEN OR AMONG MEMBERS OF A PUBLIC BODY ON ANY PUBLIC BUSINESS WITHIN ITS JURISDICTION; THIS DOES NOT INCLUDE THE DISTRIBUTION OF MEETING MATERIALS, SCHEDULING INFORMATION OR REPORTS/DOCUMENTS TO BE DISCUSSED AT A MEETING.

OPEN MEETING LAW

IMPORTANT DEFINITIONS

- “INTENTIONAL VIOLATION” MEANS AN ACT OR OMISSION BY A PUBLIC BODY OR A MEMBER THEREOF, IN KNOWING VIOLATION OF M.G.L. c. 30A, SEC. 18-25. EVIDENCE OF AN INTENTIONAL VIOLATION OF M.G.L. c. 30A, SEC. 18-25 SHALL INCLUDE, BUT NOT BE LIMITED TO, THAT THE PUBLIC BODY OR PUBLIC BODY MEMBER (A) ACTED WITH SPECIFIC INTENT TO VIOLATE THE LAW; (B) ACTED WITH DELIBERATE IGNORANCE OF THE LAW’S REQUIREMENTS; OR (C) WAS PREVIOUSLY INFORMED BY RECEIPT OF A DECISION FROM A COURT OF COMPETENT JURISDICTION OR ADVISED BY THE ATTORNEY GENERAL, PURSUANT TO 940 CMR 29.07 OR 940 CMR 29.08, THAT THE CONDUCT VIOLATES M.G.L. c. 30A, SEC. 18-25. WHERE A PUBLIC BODY OR PUBLIC BODY MEMBER HAS MADE A GOOD FAITH ATTEMPT AT COMPLIANCE WITH THE LAW, BUT WAS REASONABLY MISTAKEN ABOUT ITS REQUIREMENTS, SUCH CONDUCT WILL NOT BE CONSIDERED AN INTENTIONAL VIOLATION OF M.G.L. c. 30A, SEC. 18-25.



OPEN MEETING LAW

IMPORTANT DEFINITIONS

- “MEETING” INCLUDES ALL DELIBERATIONS OF A PUBLIC BODY BUT IT DOES NOT INCLUDE THE FOLLOWING PROVIDED NO DELIBERATION OCCURS:
 - (A) AN ON-SITE INSPECTION OF A PROJECT OR PROGRAM;
 - (B) ATTENDANCE BY A QUORUM OF A PUBLIC BODY AT A PUBLIC OR PRIVATE GATHERING, INCLUDING A CONFERENCE OR TRAINING PROGRAM OR A MEDIA, SOCIAL OR OTHER EVENT;
 - (C) ATTENDANCE BY A QUORUM OF A PUBLIC BODY AT A MEETING OF ANOTHER PUBLIC BODY THAT HAS COMPLIED WITH THE NOTICE REQUIREMENTS OF THE OPEN MEETING LAW, SO LONG AS THE VISITING MEMBERS COMMUNICATE ONLY BY OPEN PARTICIPATION IN THE MEETING ON THOSE MATTERS UNDER DISCUSSION;
 - (D) A MEETING OF A QUASI-JUDICIAL BOARD OR COMMISSION HELD FOR THE SOLE PURPOSE OF MAKING A DECISION REQUIRED IN AN ADJUDICATORY PROCEEDING BROUGHT BEFORE IT; OR
 - (E) A SESSION OF A TOWN MEETING CONVENED UNDER SECTION 10 OF CHAPTER 39 WHICH WOULD INCLUDE THE ATTENDANCE BY A QUORUM OF A PUBLIC BODY AT ANY SUCH SESSION.

OPEN MEETING LAW

MEETING NOTICE

- MEETING NOTICE MUST BE POSTED AT LEAST 48 HOURS PRIOR TO THE MEETING *EXCLUDING* SATURDAYS, SUNDAYS AND LEGAL HOLIDAYS;
- NOTICE MUST INCLUDE THE PURPOSE OF THE MEETING, THE AGENDA AND ANY OTHER MATTERS THE CHAIR REASONABLY BELIEVES WILL BE DISCUSSED; IN ADDITION, THE NOTICE MUST CONTAIN THE DATE/TIME OF POSTING AND DATE/TIME OF AMENDMENTS;
- NOTICE MUST BE POSTED IN OR ON THE BUILDING THAT HOUSES THE CLERK'S OFFICE AND MUST BE VISIBLE TO THE PUBLIC "AT ALL TIMES" (24 HOURS A DAY, 7 DAYS A WEEK);

OPEN MEETING LAW

MEETING NOTICE CONT'D

- A DECISION BY THE AG EMPHASIZES THE IMPORTANCE THAT ALL MEETING NOTICES INCLUDE SUFFICIENT INFORMATION REGARDING THE TOPICS TO BE DISCUSSED AT THE MEETING SUCH THAT IT REASONABLY INFORMS THE PUBLIC OF WHAT WILL BE DISCUSSED – INCLUDING TOPICS TO BE DISCUSSED IN EXECUTIVE SESSION.
 - A MEETING NOTICE STATING THE NAME OF THE APPLICANT AND NOTING IT WAS A REQUEST FOR AN EXTENSION OF AN ORDER OF CONDITIONS WAS FOUND TO BE INSUFFICIENT.
 - THE AG NOTED THAT ALL OTHER ITEMS ON THE AGENDA WERE LISTED AS “PUBLIC HEARINGS”, WHILE THE NOTICE FOR THE EXTENSION WAS NOT IDENTIFIED AS A PUBLIC HEARING.
 - THE AG DETERMINED THAT THE FAILURE TO NOTE THAT THE HEARING ON THE EXTENSION WAS A PUBLIC HEARING CONSTITUTED A VIOLATION OF THE OML.

OPEN MEETING LAW

MEETING NOTICE CONT'D

- ANOTHER RECENT DECISION BY THE AG PROVIDES ADDITIONAL CLARITY REGARDING THE SUFFICIENCY OF NOTICE.
 - THE AG'S OFFICE NOTED THAT NOTICE FOR AN EXECUTIVE SESSION MUST STATE "ALL SUBJECTS THAT MAY BE REVEALED WITHOUT COMPROMISING THE PURPOSE FOR WHICH THE EXECUTIVE SESSION WAS CALLED."
 - IN THIS CASE, THE AG'S OFFICE FOUND NO VIOLATION, BECAUSE CONTINGENCIES TO A PURCHASE AND SALE AGREEMENT THAT WAS THE SUBJECT OF THE EXECUTIVE SESSION HAD NOT YET BEEN COMPLETED, THUS THE NOTICE COULD PROPERLY EXCLUDE THOSE DETAILS TO AVOID COMPROMISING THE PURPOSE OF THE EXECUTIVE SESSION.
- CONVERSELY, THE SUPERIOR COURT RECENTLY OVERTURNED A DECISION OF THE AG WHICH FOUND A BOARD VIOLATED THE OML BY FAILING TO IDENTIFY THE NAMES OF LITIGANTS AND UNIONS PRIOR TO ENTERING INTO EXECUTIVE SESSION.
 - THE SUPERIOR COURT FOUND THAT THE AG'S OFFICE'S INTERPRETATION THAT SUCH DETAILS WERE NECESSARY WAS NOT FOUND IN THE STATUTE AND IN ESSENCE IMPOSED AN ADDITIONAL REQUIREMENT NOT IN THE LAW.

OPEN MEETING LAW

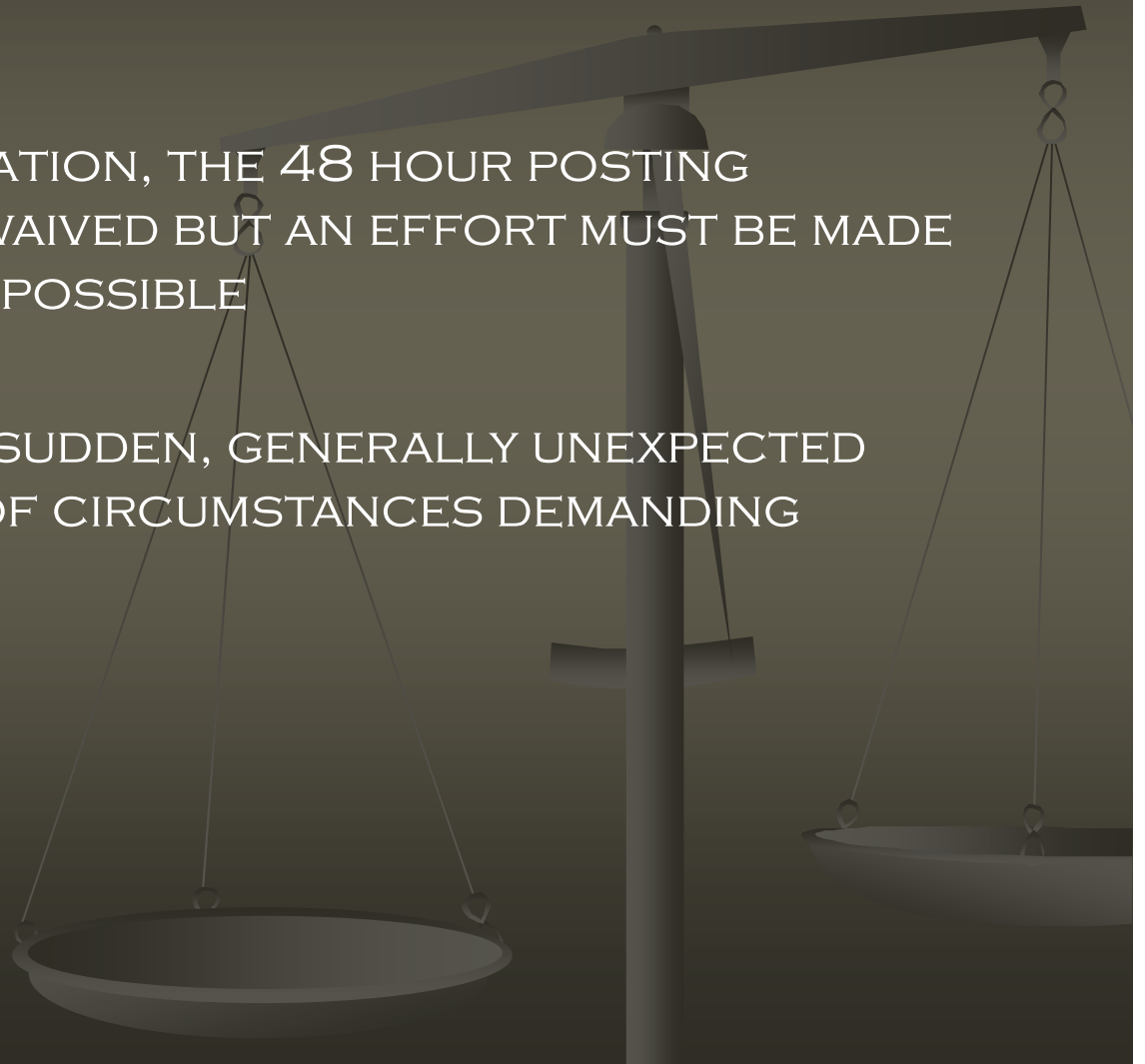
ALTERNATIVE NOTICE POSTING

- A MUNICIPALITY MAY ADOPT THE MUNICIPAL WEBSITE AS ITS OFFICIAL METHOD OF NOTICE POSTING, PER 940 CMR 29.03(2)(B):
 - THE LAW PROVIDES FOR A GRACE PERIOD FOR COMPLIANCE IN THE EVENT A WEBSITE IS DISABLED;
 - IF THE WEBSITE IS DISABLED FOR LESS THAN 6 BUSINESS HOURS, THE MEETING CAN GO FORWARD, OTHERWISE THE MEETING IS TO BE CANCELED;

OPEN MEETING LAW

ALTERNATIVE NOTICE POSTING

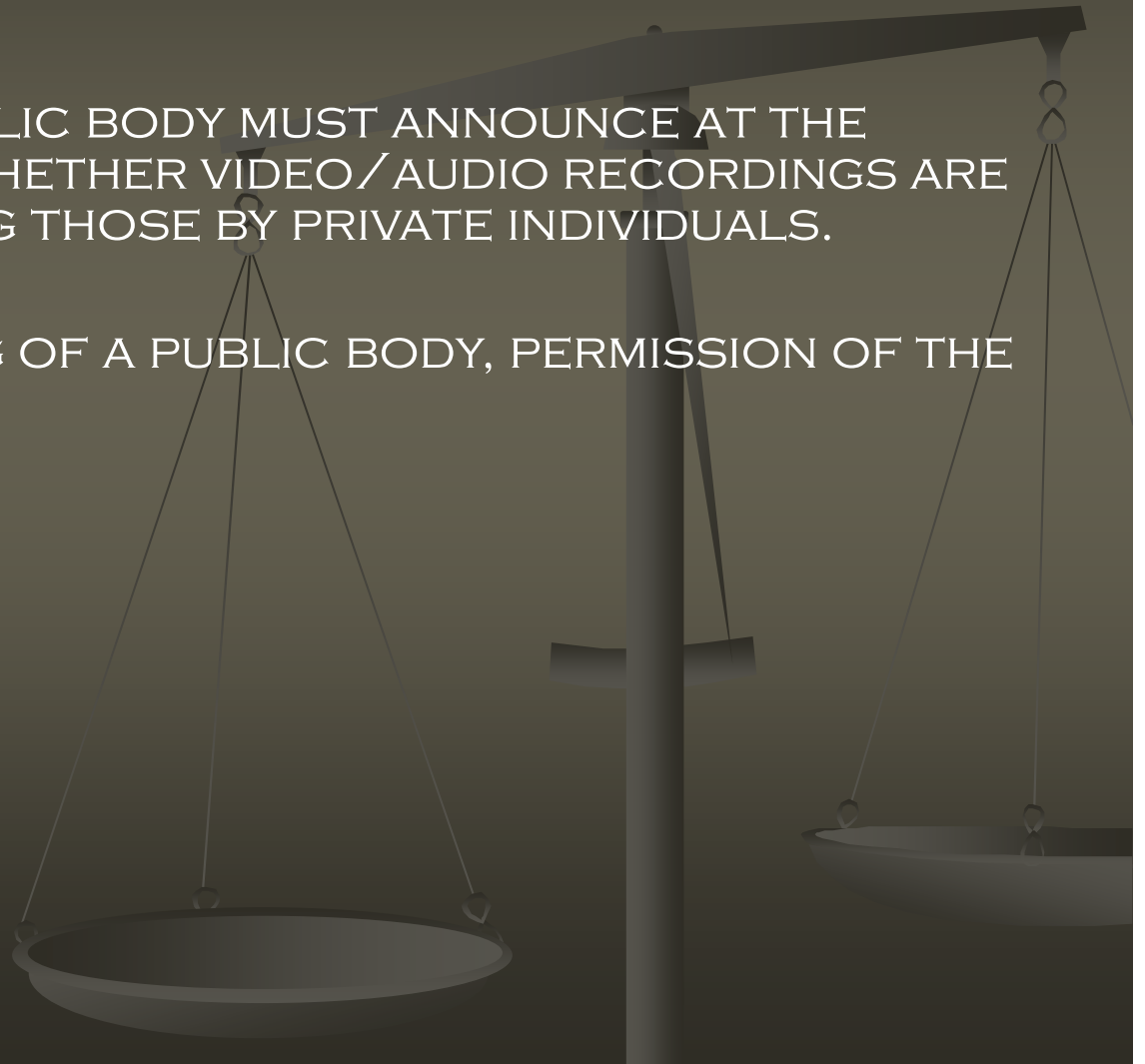
- IN AN EMERGENCY SITUATION, THE 48 HOUR POSTING REQUIREMENT MAY BE WAIVED BUT AN EFFORT MUST BE MADE TO COMPLY WHENEVER POSSIBLE
- AN EMERGENCY IS ANY SUDDEN, GENERALLY UNEXPECTED OCCURRENCE OR SET OF CIRCUMSTANCES DEMANDING IMMEDIATE ACTION



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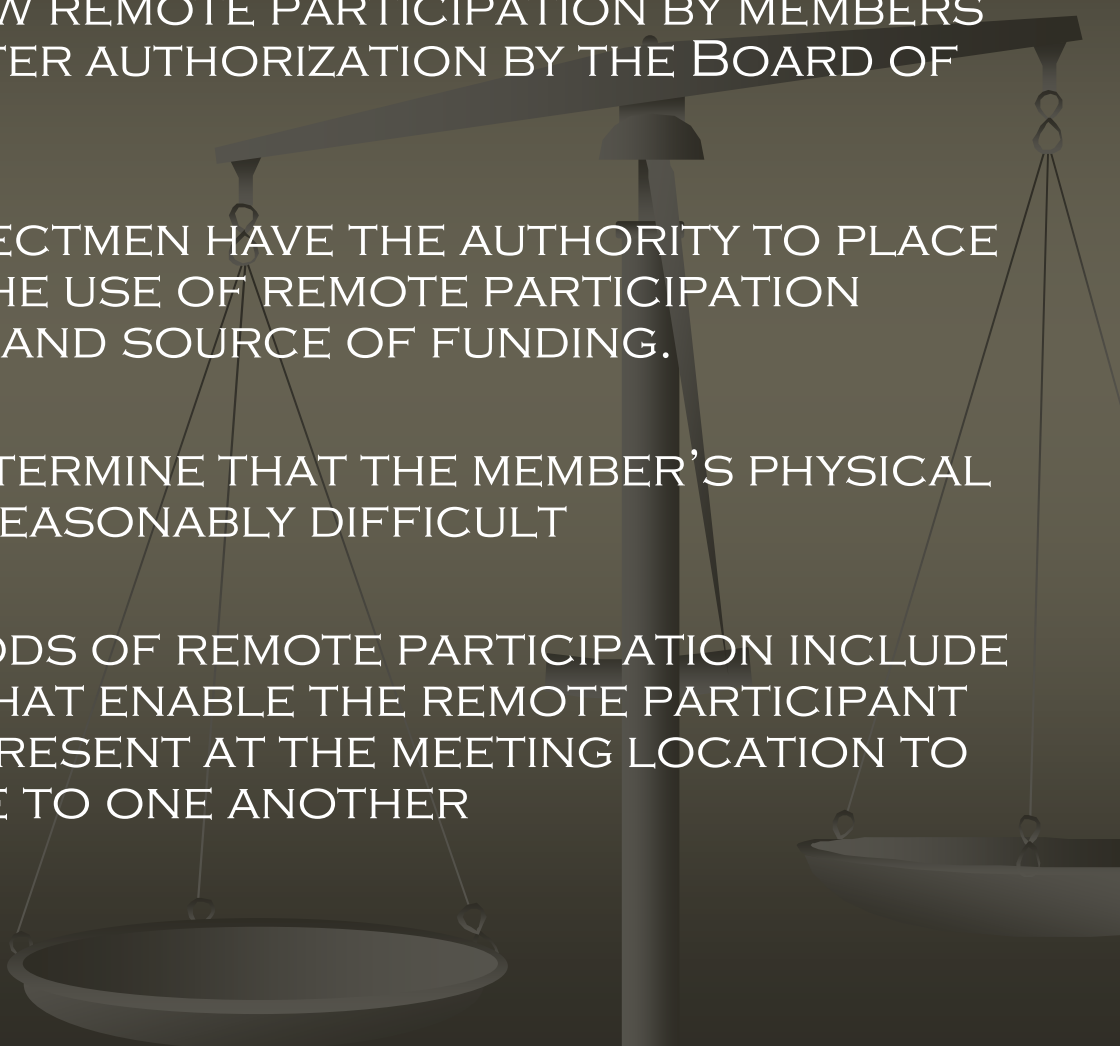
CONDUCTING MEETING

- THE CHAIR OF THE PUBLIC BODY MUST ANNOUNCE AT THE START OF A MEETING WHETHER VIDEO/AUDIO RECORDINGS ARE BEING MADE, INCLUDING THOSE BY PRIVATE INDIVIDUALS.
- TO ADDRESS A MEETING OF A PUBLIC BODY, PERMISSION OF THE CHAIR IS REQUIRED.



OPEN MEETING LAW

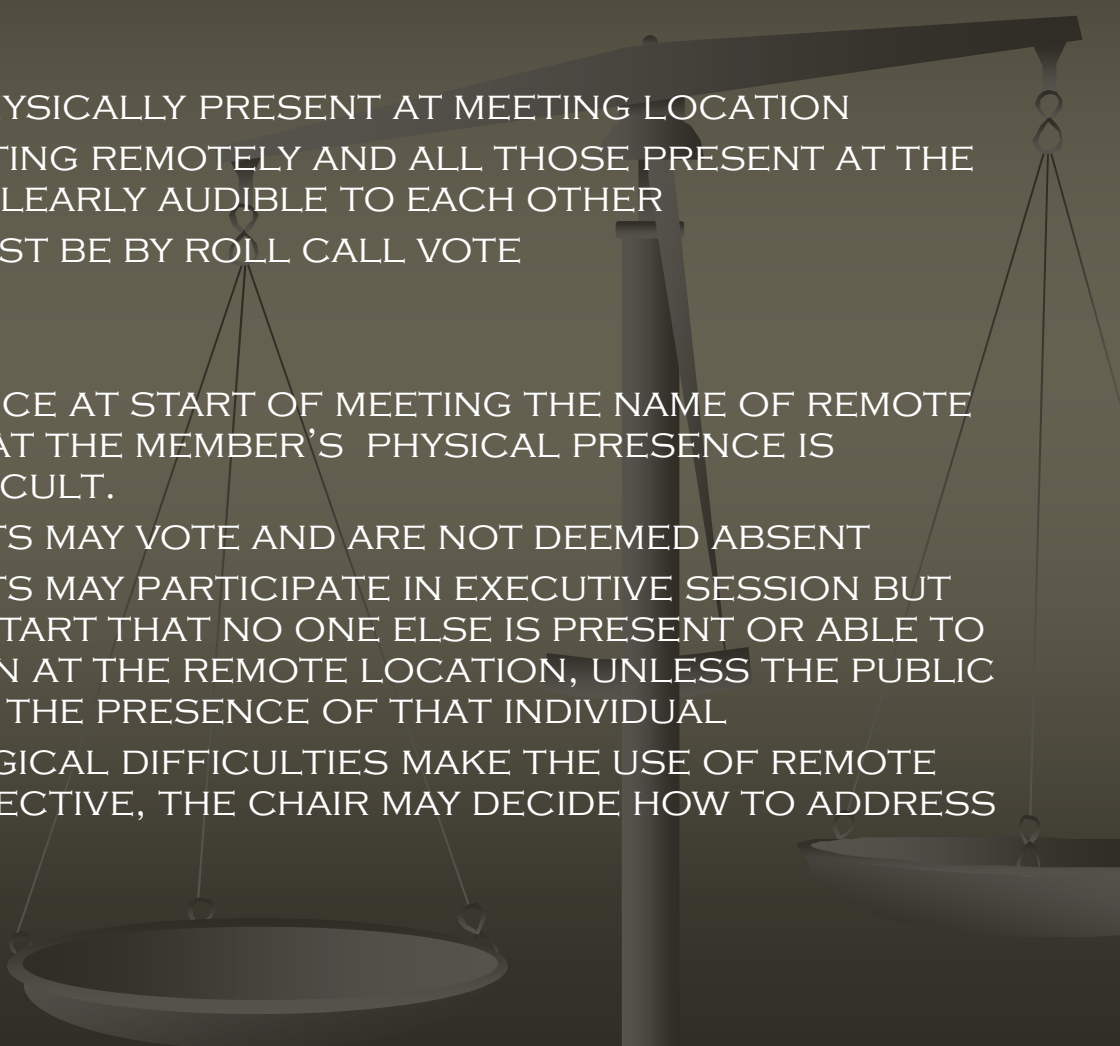
REMOTE PARTICIPATION

- REGULATIONS ALLOW REMOTE PARTICIPATION BY MEMBERS OF A BODY ONLY AFTER AUTHORIZATION BY THE BOARD OF SELECTMEN.
 - THE BOARD OF SELECTMEN HAVE THE AUTHORITY TO PLACE RESTRICTIONS ON THE USE OF REMOTE PARTICIPATION INCLUDING AMOUNT AND SOURCE OF FUNDING.
 - THE CHAIR MUST DETERMINE THAT THE MEMBER'S PHYSICAL ATTENDANCE IS UNREASONABLY DIFFICULT
 - ACCEPTABLE METHODS OF REMOTE PARTICIPATION INCLUDE ANY TECHNOLOGY THAT ENABLE THE REMOTE PARTICIPANT AND ALL PERSONS PRESENT AT THE MEETING LOCATION TO BE CLEARLY AUDIBLE TO ONE ANOTHER
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OPEN MEETING LAW

REMOTE PARTICIPATION, CONT'D

- MINIMUM REQUIREMENTS
 - QUORUM MUST BE PHYSICALLY PRESENT AT MEETING LOCATION
 - MEMBERS PARTICIPATING REMOTELY AND ALL THOSE PRESENT AT THE LOCATION MUST BE CLEARLY AUDIBLE TO EACH OTHER
 - ALL VOTES TAKEN MUST BE BY ROLL CALL VOTE

 - PROCEDURE:
 - CHAIR MUST ANNOUNCE AT START OF MEETING THE NAME OF REMOTE PARTICIPANT AND THAT THE MEMBER'S PHYSICAL PRESENCE IS UNREASONABLY DIFFICULT.
 - REMOTE PARTICIPANTS MAY VOTE AND ARE NOT DEEMED ABSENT
 - REMOTE PARTICIPANTS MAY PARTICIPATE IN EXECUTIVE SESSION BUT MUST STATE AT THE START THAT NO ONE ELSE IS PRESENT OR ABLE TO HEAR THE DISCUSSION AT THE REMOTE LOCATION, UNLESS THE PUBLIC BODY HAS APPROVED THE PRESENCE OF THAT INDIVIDUAL
 - ANY TIME TECHNOLOGICAL DIFFICULTIES MAKE THE USE OF REMOTE PARTICIPATION INEFFECTIVE, THE CHAIR MAY DECIDE HOW TO ADDRESS THE ISSUE.
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OPEN MEETING LAW

EMAIL

- AS NOTED IN THE DEFINITION OF DELIBERATION, DISCUSSIONS VIA EMAIL OF TOPICS WITHIN A BOARD'S JURISDICTION ARE DELIBERATIONS AND VIOLATE THE OPEN MEETING LAW.
- EMAIL COMMUNICATIONS MUST THEREFORE BE LIMITED TO THE DISTRIBUTION OF MEETING MATERIALS AND SIMILAR INFORMATION.
- IT IS SUGGESTED THAT ALL EMAILS CONTAIN THE FOLLOWING STATEMENT: "THIS EMAIL IS FOR THE DISTRIBUTION OF MATERIALS ONLY, NOT FOR DISCUSSION PURPOSES."

OPEN MEETING LAW

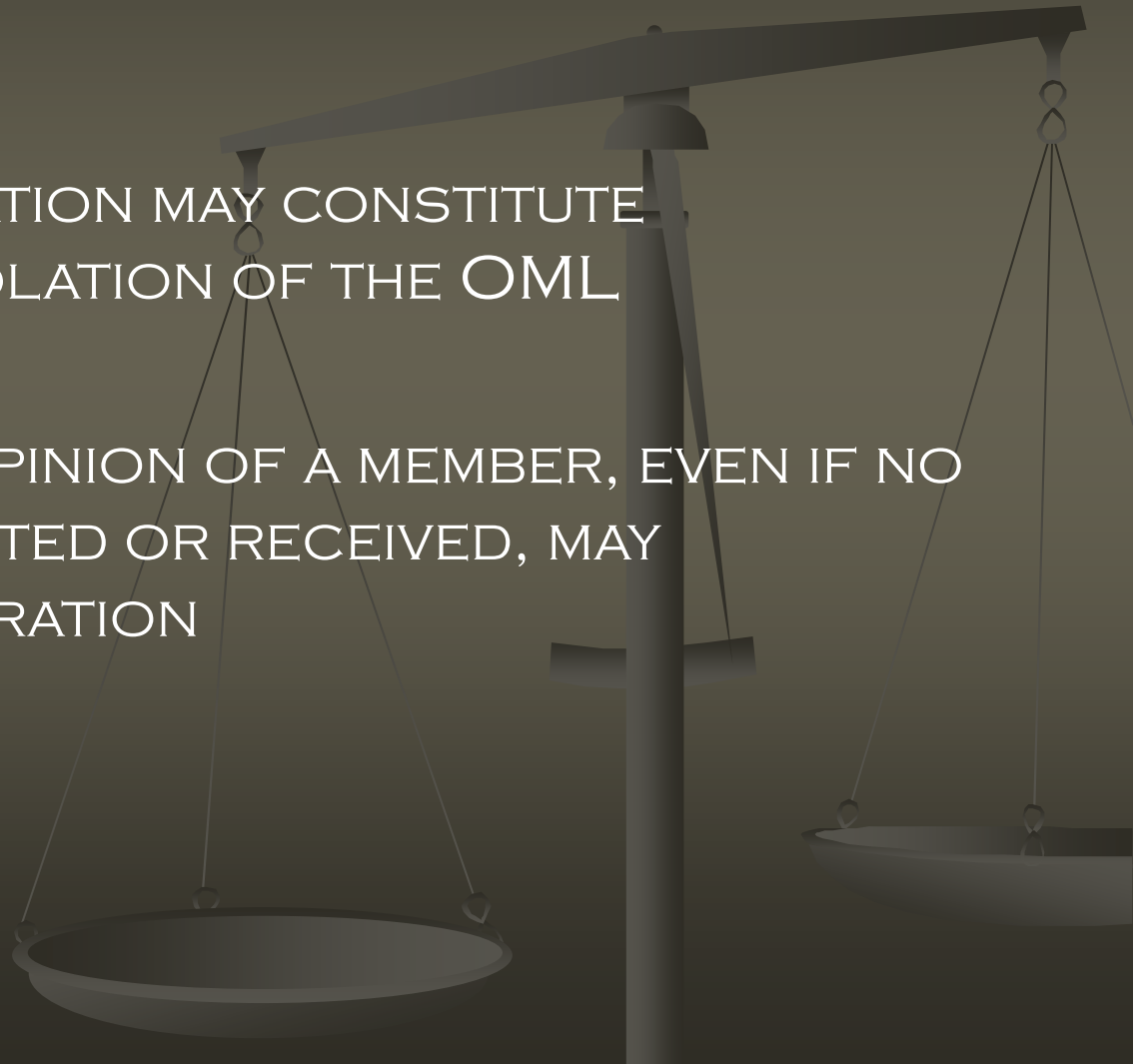
EMAIL

- A RECENT DECISION BY THE AG'S OFFICE FOUND THAT COMMUNICATION VIA EMAIL CONSTITUTE DELIBERATION IN VIOLATION OF THE OML
 - IN THIS CASE, A STUDY COMMITTEE CREATED A VOTING GRID ADDRESSING A NUMBER OF POTENTIAL ISSUES, WHICH WAS CIRCULATED VIA EMAIL TO THE MEMBERS OF THE COMMITTEE.
 - THE AG FOUND THAT EVERY EMAIL EXCHANGED CONTAINING COMPLETED VOTING GRIDS CONSTITUTED AN OML VIOLATION AS IMPROPER DELIBERATION.
 - THE CIRCULATION OF THE BLANK VOTING GRID WAS NOT FOUND TO CONSTITUTE A VIOLATION, THE VIOLATION OCCURRED WHEN COMPLETED GRIDS WERE CIRCULATED.

OPEN MEETING LAW

EMAIL

- SERIAL COMMUNICATION MAY CONSTITUTE DELIBERATION IN VIOLATION OF THE OML
- EXPRESSIONS OF OPINION OF A MEMBER, EVEN IF NO RESPONSE IS SOLICITED OR RECEIVED, MAY CONSTITUTE DELIBERATION



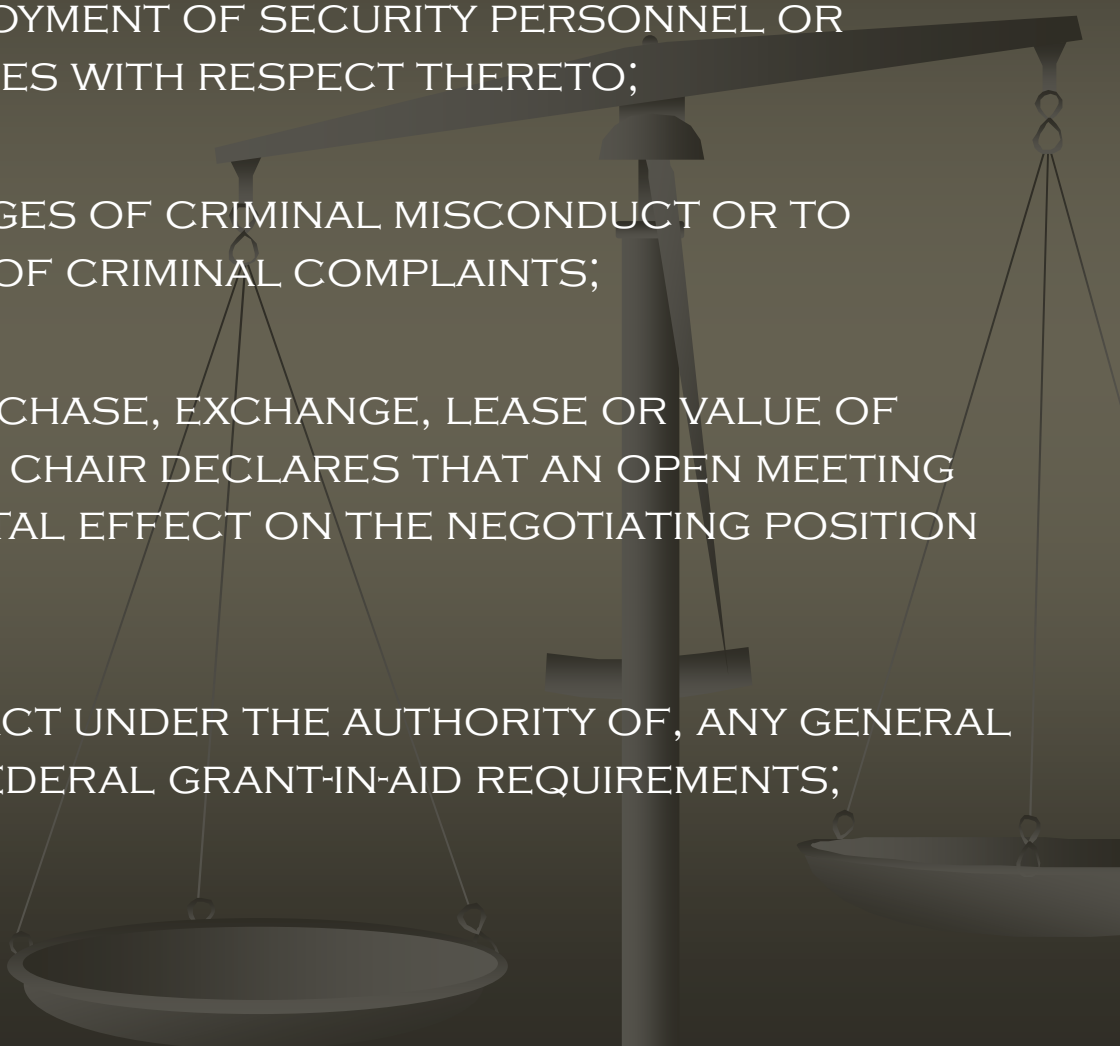
OPEN MEETING LAW

EXECUTIVE SESSION

- EXECUTIVE SESSION IS ANY PART OF ANY MEETING OF A PUBLIC BODY THAT IS NOT OPEN TO THE PUBLIC. THE FOLLOWING MAY BE DISCUSSED PROVIDED THE CHAIR ANNOUNCES IN OPEN SESSION THAT DISCUSSION IN OPEN SESSION WOULD HAVE A DETRIMENTAL EFFECT:
 - TO DISCUSS THE REPUTATION, CHARACTER, PHYSICAL CONDITION OR MENTAL HEALTH, RATHER THAN PROFESSIONAL COMPETENCE, OF AN INDIVIDUAL, OR TO DISCUSS THE DISCIPLINE OR DISMISSAL OF, OR COMPLAINTS OR CHARGES BROUGHT AGAINST, A PUBLIC OFFICER, EMPLOYEE, STAFF MEMBER OR INDIVIDUAL;
 - TO CONDUCT STRATEGY SESSIONS IN PREPARATION FOR NEGOTIATIONS WITH NONUNION PERSONNEL OR TO CONDUCT COLLECTIVE BARGAINING SESSIONS OR CONTRACT NEGOTIATIONS WITH NONUNION PERSONNEL;
 - TO DISCUSS STRATEGY WITH RESPECT TO COLLECTIVE BARGAINING OR LITIGATION IF AN OPEN MEETING MAY HAVE A DETRIMENTAL EFFECT ON THE BARGAINING OR LITIGATING POSITION OF THE PUBLIC BODY AND THE CHAIR SO DECLARES;

OPEN MEETING LAW

EXECUTIVE SESSION CONT'D

- TO DISCUSS THE DEPLOYMENT OF SECURITY PERSONNEL OR DEVICES, OR STRATEGIES WITH RESPECT THERETO;
 - TO INVESTIGATE CHARGES OF CRIMINAL MISCONDUCT OR TO CONSIDER THE FILING OF CRIMINAL COMPLAINTS;
 - TO CONSIDER THE PURCHASE, EXCHANGE, LEASE OR VALUE OF REAL PROPERTY IF THE CHAIR DECLARES THAT AN OPEN MEETING MAY HAVE A DETRIMENTAL EFFECT ON THE NEGOTIATING POSITION OF THE PUBLIC BODY;
 - TO COMPLY WITH, OR ACT UNDER THE AUTHORITY OF, ANY GENERAL OR SPECIAL LAW OR FEDERAL GRANT-IN-AID REQUIREMENTS;
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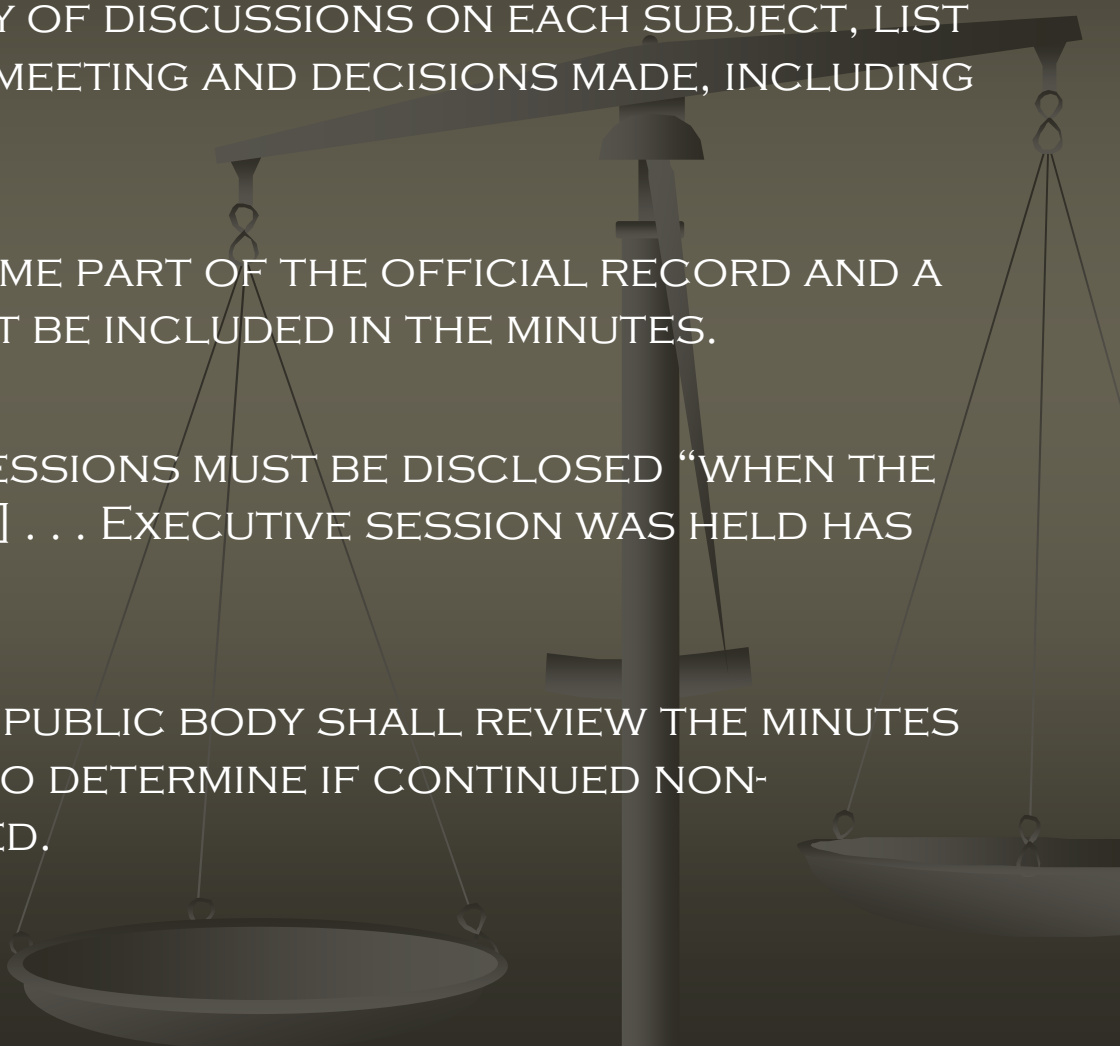
OPEN MEETING LAW

EXECUTIVE SESSION CONT'D

- TO CONSIDER OR INTERVIEW APPLICANTS FOR EMPLOYMENT OR APPOINTMENT BY A PRELIMINARY SCREENING COMMITTEE IF THE CHAIR DECLARES THAT AN OPEN MEETING WILL HAVE A DETRIMENTAL EFFECT ON OBTAINING QUALIFIED APPLICANTS; PROVIDED, HOWEVER, THAT THIS CLAUSE SHALL NOT APPLY TO ANY MEETING, INCLUDING MEETINGS OF A PRELIMINARY SCREENING COMMITTEE, TO CONSIDER AND INTERVIEW APPLICANTS WHO HAVE PASSED A PRIOR PRELIMINARY SCREENING;
- TO MEET OR CONFER WITH A MEDIATOR, AS DEFINED IN SECTION 23C OF CHAPTER 233, WITH RESPECT TO ANY LITIGATION OR DECISION ON ANY PUBLIC BUSINESS WITHIN ITS JURISDICTION INVOLVING ANOTHER PARTY, GROUP OR ENTITY;
- TO DISCUSS TRADE SECRETS OR CONFIDENTIAL, COMPETITIVELY-SENSITIVE OR OTHER PROPRIETARY INFORMATION PROVIDED IN THE COURSE OF ACTIVITIES CONDUCTED BY A GOVERNMENTAL BODY AS AN ENERGY SUPPLIER UNDER A LICENSE GRANTED BY THE DEPARTMENT OF PUBLIC UTILITIES

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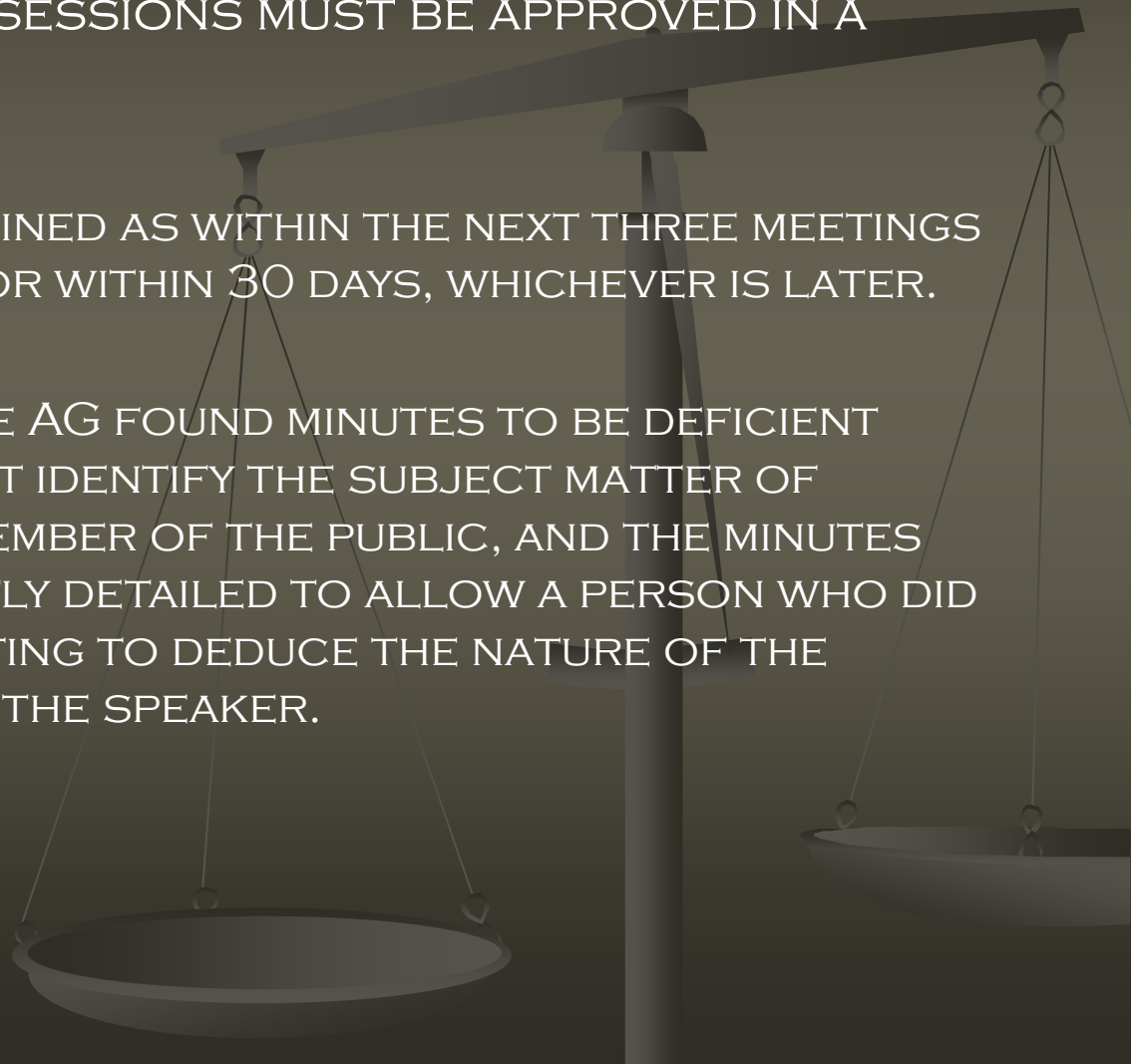
MINUTES

- MUST INCLUDE A SUMMARY OF DISCUSSIONS ON EACH SUBJECT, LIST OF EXHIBITS USED AT THE MEETING AND DECISIONS MADE, INCLUDING A RECORD OF ALL VOTES.
 - ALL EXHIBITS SHALL BECOME PART OF THE OFFICIAL RECORD AND A LIST OF THE EXHIBITS MUST BE INCLUDED IN THE MINUTES.
 - MINUTES OF EXECUTIVE SESSIONS MUST BE DISCLOSED “WHEN THE PURPOSE FOR WHICH [THE] . . . EXECUTIVE SESSION WAS HELD HAS BEEN SERVED.”
 - AT REGULAR INTERVALS, A PUBLIC BODY SHALL REVIEW THE MINUTES OF EXECUTIVE SESSIONS TO DETERMINE IF CONTINUED NON-DISCLOSURE IS WARRANTED.
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OPEN MEETING LAW

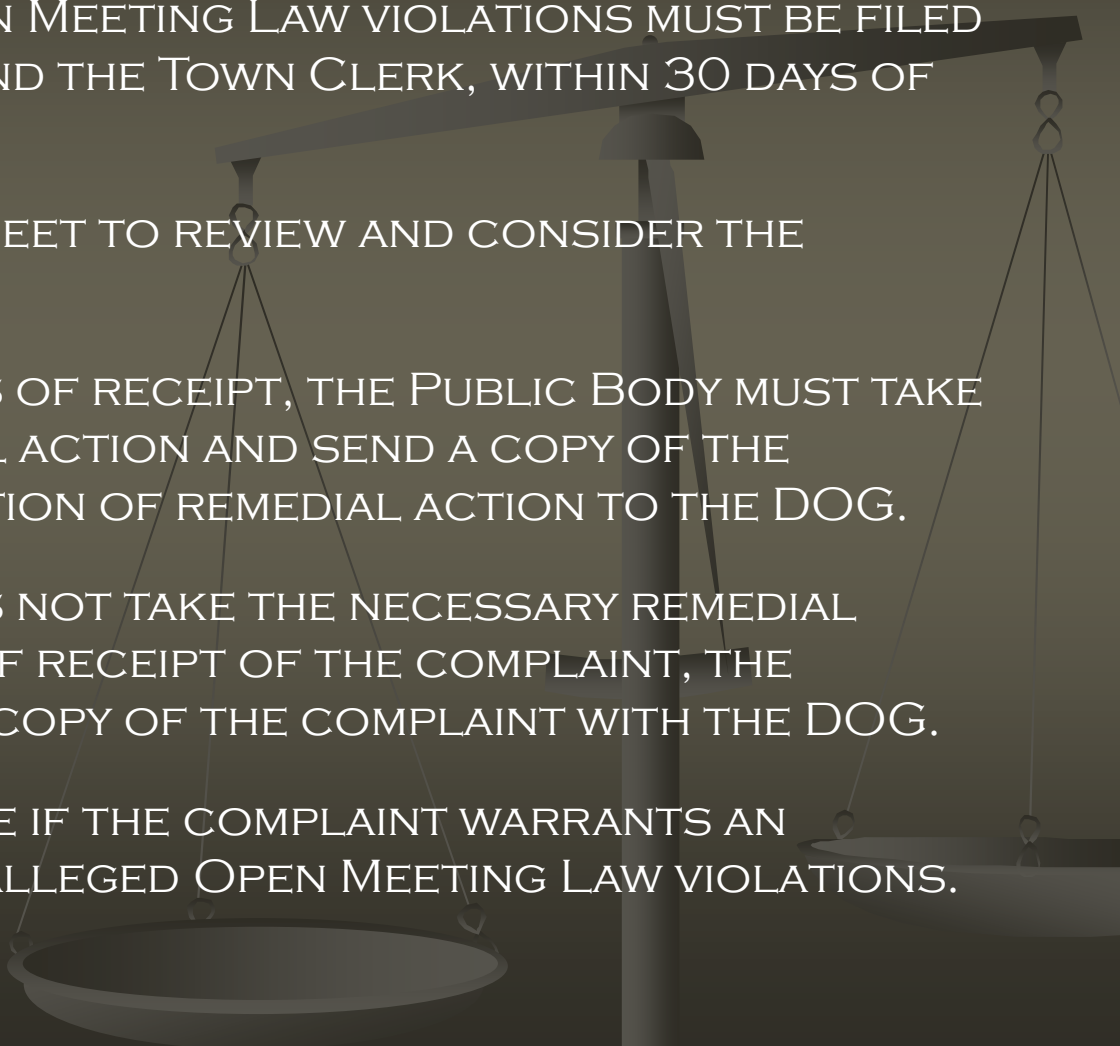
MINUTES

- MINUTES OF ALL OPEN SESSIONS MUST BE APPROVED IN A TIMELY MANNER.
 - TIMELY MANNER IS DEFINED AS WITHIN THE NEXT THREE MEETINGS OF THE PUBLIC BODY OR WITHIN 30 DAYS, WHICHEVER IS LATER.
 - IN A RECENT CASE, THE AG FOUND MINUTES TO BE DEFICIENT BECAUSE THEY DID NOT IDENTIFY THE SUBJECT MATTER OF COMMENTS FROM A MEMBER OF THE PUBLIC, AND THE MINUTES WERE NOT SUFFICIENTLY DETAILED TO ALLOW A PERSON WHO DID NOT ATTEND THE MEETING TO DEDUCE THE NATURE OF THE CONCERNS RAISED BY THE SPEAKER.



OPEN MEETING LAW

ENFORCEMENT

- ALL COMPLAINTS OF OPEN MEETING LAW VIOLATIONS MUST BE FILED WITH THE PUBLIC BODY AND THE TOWN CLERK, WITHIN 30 DAYS OF THE ALLEGED VIOLATION.
 - THE PUBLIC BODY MUST MEET TO REVIEW AND CONSIDER THE COMPLAINT.
 - WITHIN 14 BUSINESS DAYS OF RECEIPT, THE PUBLIC BODY MUST TAKE ANY NECESSARY REMEDIAL ACTION AND SEND A COPY OF THE COMPLAINT AND DESCRIPTION OF REMEDIAL ACTION TO THE DOG.
 - IF THE PUBLIC BODY DOES NOT TAKE THE NECESSARY REMEDIAL ACTION WITHIN 30 DAYS OF RECEIPT OF THE COMPLAINT, THE COMPLAINANT MAY FILE A COPY OF THE COMPLAINT WITH THE DOG.
 - THE DOG WILL DETERMINE IF THE COMPLAINT WARRANTS AN INVESTIGATION INTO THE ALLEGED OPEN MEETING LAW VIOLATIONS.
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OPEN MEETING LAW

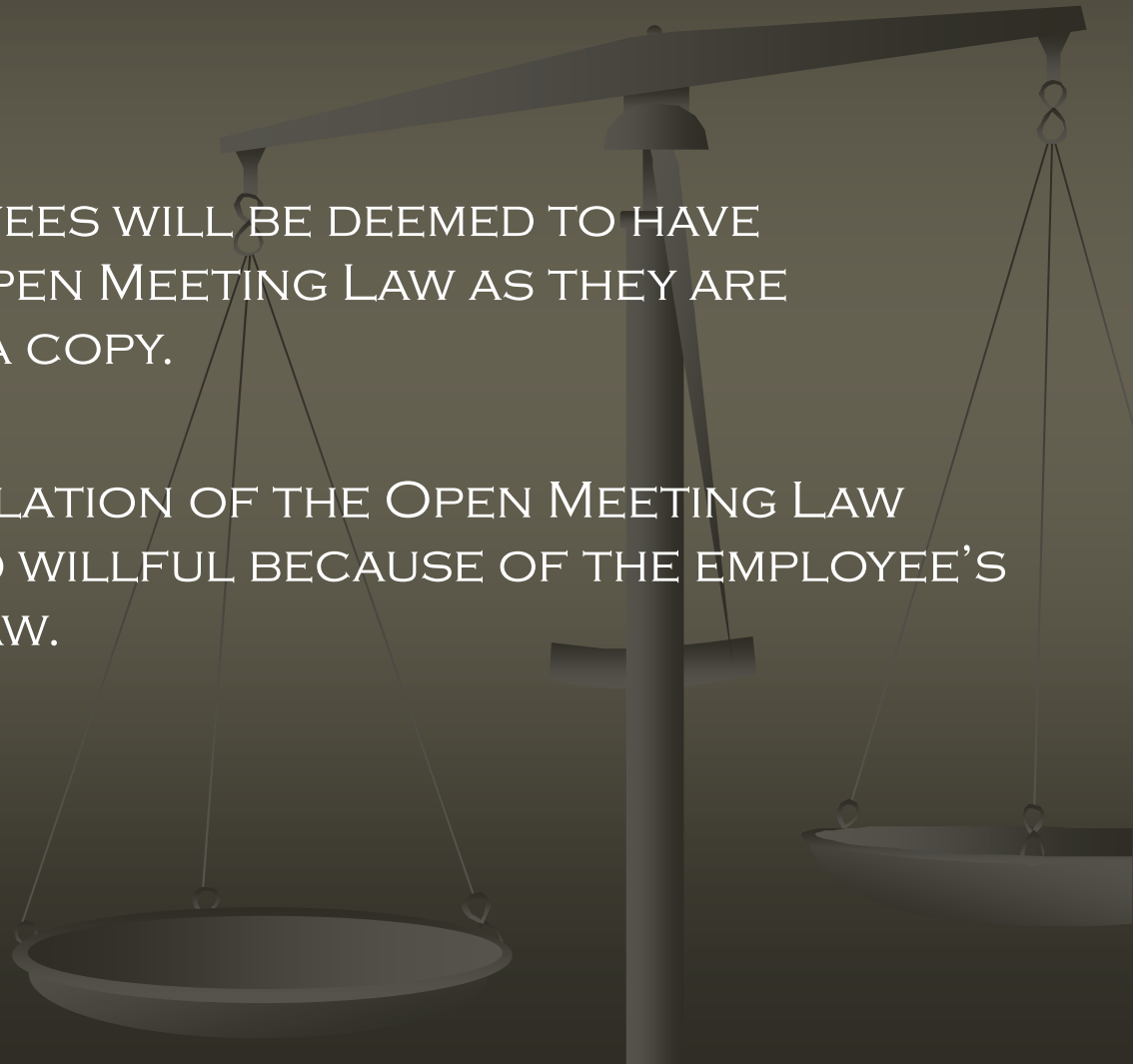
ENFORCEMENT CONT'D

- THE DOG MAY RESOLVE OPEN MEETING LAW VIOLATIONS THROUGH INFORMAL COMMUNICATIONS WITH THE PUBLIC BODY OR A FORMAL ORDER WHICH MAY REQUIRE THE FOLLOWING:
 - IMMEDIATE AND FUTURE COMPLIANCE WITH THE OPEN MEETING LAW;
 - ATTENDANCE AT A TRAINING SESSION AUTHORIZED BY THE AG;
 - THAT MINUTES, RECORDS OR OTHER MATERIALS BE MADE PUBLIC;
 - NULLIFICATION OF ACTION TAKEN BY THE PUBLIC BODY;
 - REINSTATEMENT OF AN EMPLOYEE, WITHOUT THE NECESSITY OF A HEARING BEFORE AN ADMINISTRATIVE LAW JUDGE
 - IMPOSITION OF A FINE UPON THE PUBLIC BODY FOR NOT MORE THAN \$1,000.00 PER INTENTIONAL VIOLATION;
 - OTHER APPROPRIATE ACTION.

OPEN MEETING LAW

ENFORCEMENT CONT'D

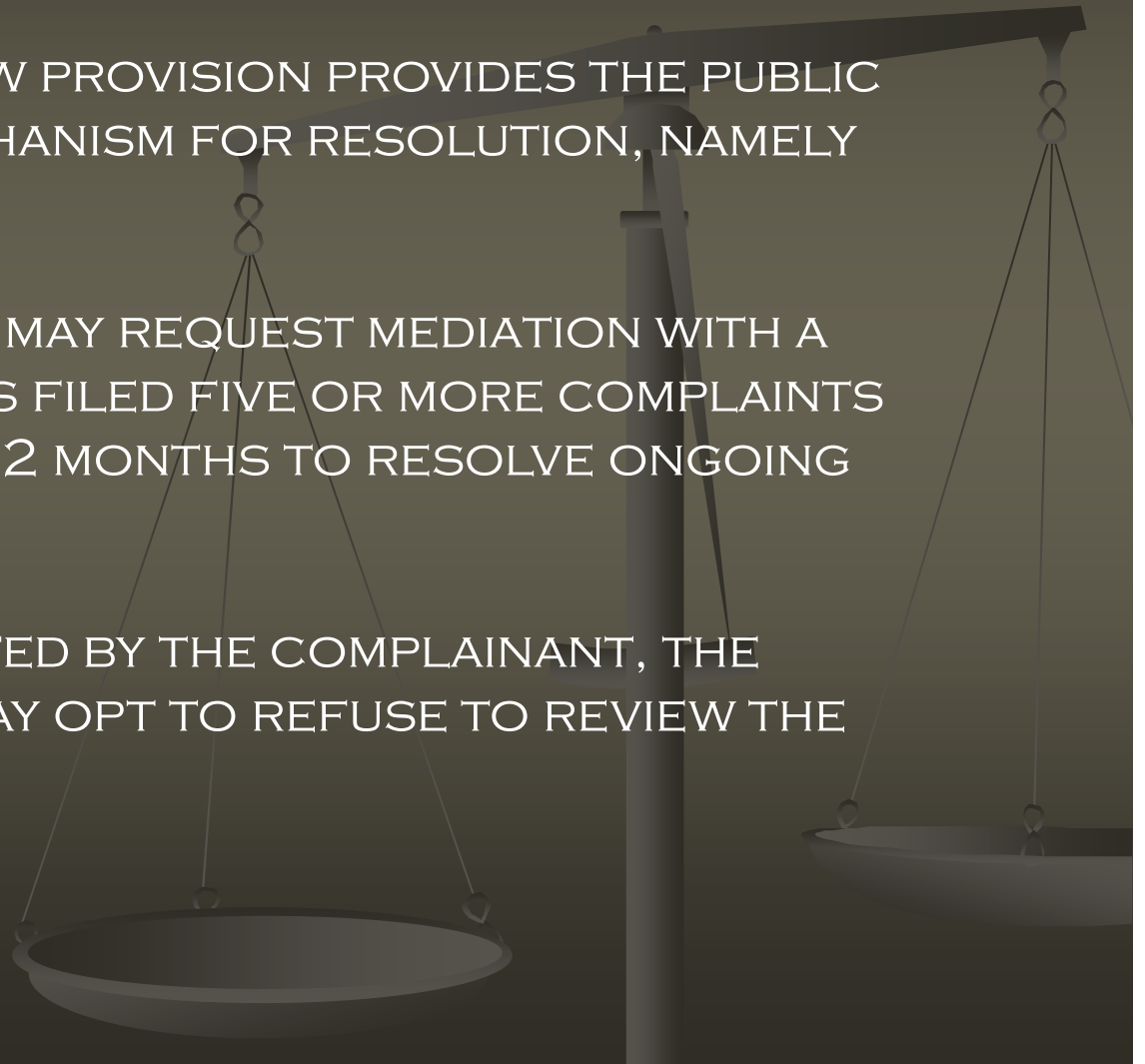
- ALL MUNICIPAL EMPLOYEES WILL BE DEEMED TO HAVE KNOWLEDGE OF THE OPEN MEETING LAW AS THEY ARE REQUIRED TO RECEIVE A COPY.
- ACCORDINGLY, ANY VIOLATION OF THE OPEN MEETING LAW COULD BE CONSIDERED WILLFUL BECAUSE OF THE EMPLOYEE'S KNOWLEDGE OF THE LAW.



OPEN MEETING LAW

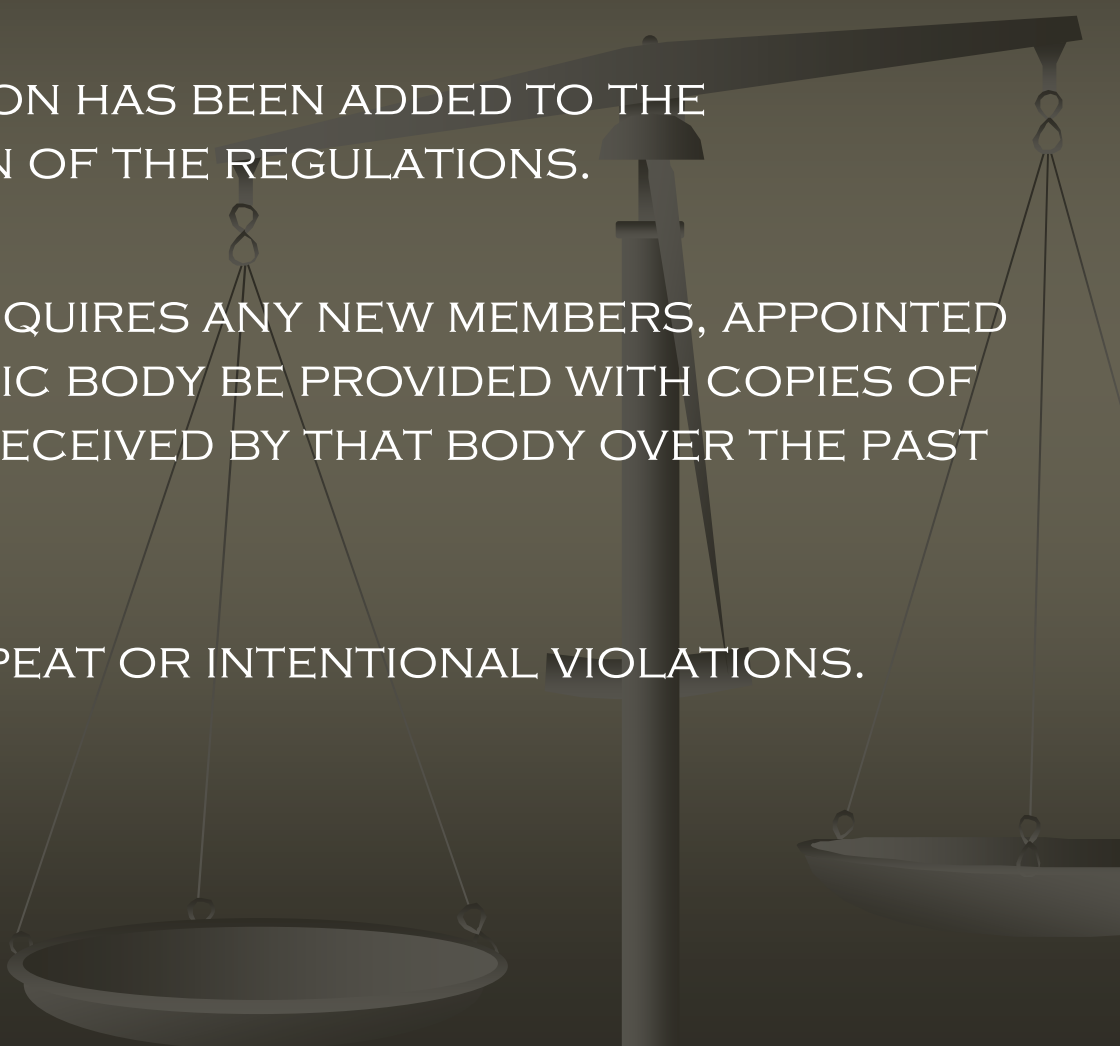
MEDIATION

- ANOTHER ENTIRELY NEW PROVISION PROVIDES THE PUBLIC BODY WITH A NEW MECHANISM FOR RESOLUTION, NAMELY MEDIATION.
- THE PUBLIC BODY NOW MAY REQUEST MEDIATION WITH A COMPLAINANT WHO HAS FILED FIVE OR MORE COMPLAINTS WITHIN THE PREVIOUS 12 MONTHS TO RESOLVE ONGOING CONFLICTS.
- IF MEDIATION IS REJECTED BY THE COMPLAINANT, THE ATTORNEY GENERAL MAY OPT TO REFUSE TO REVIEW THE COMPLAINT.



OPEN MEETING LAW

CERTIFICATION

- ANOTHER NEW PROVISION HAS BEEN ADDED TO THE CERTIFICATION SECTION OF THE REGULATIONS.
 - CERTIFICATION NOW REQUIRES ANY NEW MEMBERS, APPOINTED OR ELECTED, TO A PUBLIC BODY BE PROVIDED WITH COPIES OF ALL OML VIOLATIONS RECEIVED BY THAT BODY OVER THE PAST FIVE YEARS.
 - THIS IS TO PREVENT REPEAT OR INTENTIONAL VIOLATIONS.
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OPEN MEETING LAW

ADVISORY OPINIONS

- AG MAY ISSUE ADVISORY OPINIONS ON MATTERS OF COMMON CONCERN.
- ACTION TAKEN BY A PUBLIC BODY IN GOOD FAITH RELIANCE ON AN ADVISORY OPINION WILL NOT CONSTITUTE AN INTENTIONAL VIOLATION OF THE OPEN MEETING LAW PROVIDED THE CIRCUMSTANCES ARE NOT MATERIALLY DIFFERENT FROM THOSE IN THE ADVISORY OPINION.
- PLEASE NOTE: RELIANCE ON ADVICE OF COUNSEL ALSO MAY BE ASSERTED AS A DEFENSE TO A FINDING OF AN INTENTIONAL VIOLATION

OPEN MEETING LAW

THE END

MEAD, TALERMAN & COSTA, LLC

