

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS
TWENTY-FIRST JUDICIAL CIRCUIT
STATE OF MISSOURI

FOUNDATION FOR INDIVIDUAL
RIGHTS AND EXPRESSION, INC.,

Plaintiff,

v.

CITY OF RIVERVIEW, MISSOURI, and

MICHAEL CORNELL in his official
capacity as Mayor of the City of Riverview,
Missouri,

SERVE:

Mike Cornell
Mayor
9699 Lilac Drive
Riverview, Missouri 63137

Defendants.

CAUSE NO. _____

DIVISION NO.: _____

**PETITION SEEKING JUDICIAL ENFORCEMENT OF, AND STATUTORY
PENALTIES UNDER, THE MISSOURI SUNSHINE LAW AND FOR
DECLARATORY AND INJUNCTIVE RELIEF**

1. At Riverview City Hall, transparency flows in only one direction—and not the one Missouri’s Sunshine Law requires.

2. After a St. Louis-area resident made an online joke about the background of City of Riverview Mayor Mike Cornell, the Mayor issued a subpoena demanding the resident appear at City Hall to explain himself.

3. But when the Foundation for Individual Rights and Expression—FIRE, a public interest nonprofit that defends the First Amendment—issued Sunshine Law

requests to the City of Riverview seeking records about Mayor Cornell’s fishing expedition, Riverview clammed up, ignoring its obligations under the Sunshine Law.

4. FIRE is forced to bring this action to compel Riverview and Mayor Cornell to abide by the Sunshine Law and to discourage other officials from following Riverview’s example.

PARTIES

5. Plaintiff Foundation for Individual Rights and Expression, Inc. (“FIRE”), is a nonpartisan nonprofit that defends the rights of all Americans to free speech and free thought—the essential qualities of liberty. Since 1999, FIRE has successfully defended First Amendment rights nationwide through public advocacy, targeted litigation, and amicus curiae filings in cases that implicate expressive rights.

6. As part of its mission, FIRE uses public records laws—like the federal Freedom of Information Act and Missouri’s Sunshine Law—to investigate and draw public attention to instances of censorship. *See, e.g., Adam Steinbaugh, After FIRE lawsuit, Essex County College finally turns over documents about firing of Black Lives Matter advocate*, FIRE (Jan. 23, 2018), <https://www.thefire.org/news/after-fire-lawsuit-essex-county-college-finally-turns-over-documents-about-firing-black-lives>.

7. Defendant City of Riverview (“Riverview”) is a governmental entity created pursuant to §§ 72.040 and/or 72.080, R.S.Mo. Riverview is a public governmental body as defined by § 610.010(4), R.S.Mo., and its records are subject to the provisions of Missouri’s Sunshine Law.

8. Defendant Michael Cornell (“Mayor Cornell”) is the elected mayor of Riverview. On information and belief, Mayor Cornell possesses records subject to the provisions of Missouri’s Sunshine Law. Cornell is sued in his official capacity only.

JURISDICTION AND VENUE

9. This Court has jurisdiction over this action under § 610.027, R.S.Mo.

10. Venue for this action is proper in this Court because Riverview’s principal place of business is in the County of St. Louis, Missouri.

FACTUAL ALLEGATIONS

Mayor Michael Cornell subpoenas a critic in retaliation for a joke about his background.

11. In 2014, now-Mayor Cornell was charged with impersonating a police officer. The accusation arose in connection with an alleged abusive relationship between Cornell and another individual, who was fourteen years old when Cornell met him.

12. Mayor Cornell is currently the defendant in a civil action in which the plaintiff alleges that Cornell hired him as a city employee and fired him after the plaintiff spurned Cornell’s sexual advances.

13. On May 14, 2025, the *St. Louis Post-Dispatch* reported that a St. Louis-area resident—James Carroll—posted an online joke about the Mayor’s background by commenting (on the “Nextdoor” social media website) about a missing juvenile: “SOMEONE CHECK RIVERVIEW’S MAYOR’S BASEMENT!”

14. According to the *Post-Dispatch* report, Mayor Cornell issued a subpoena to James Carroll demanding that he appear at Riverview City Hall to testify about “Cyber Bullying,” after Carroll’s social media post.

FIRE issues Sunshine Law requests to Riverview.

15. On May 15, 2025, FIRE attorney Adam Steinbaugh sent a Sunshine Act request to Riverview by emailing it to CityHall@riverviewmo.org (the “First Request”).

16. The First Request sought specific communications sent or received on or after April 1, 2025:
- a. Communications to or from Mayor Cornell about James Carroll;
 - b. Communications to or from Mayor Cornell mentioning any of these terms: James, Carroll, basement, Facebook, Nextdoor, "next door", subpoena, incitement, inciting, slander, libel, defamation, bully, bullying, or cyber; and
 - c. Communications between Riverview and the private investigator hired to serve James Carroll with the subpoena.
17. A true and correct copy of the First Request is attached as **Exhibit A**.
18. On May 19, 2025, FIRE attorney Adam Steinbaugh sent a second Sunshine Act request to Riverview via email to CityHall@riverviewmo.org (the "Second Request").
19. The Second Request sought specific records concerning agendas and minutes of recent Riverview meetings:
- a. Any agenda, tentative agenda, notice of meeting, minutes, or other records prepared for use at a hearing or meeting at Riverview City Hall on April 16, 2025, at 4:00 p.m. (*i.e.*, the hearing referenced in the subpoena to James Carroll);
 - b. Any agenda, tentative agenda, minutes, or recording of the meeting at which the subpoena to James Carroll was proposed, voted on, discussed, or adopted; and
 - c. Any agenda or tentative agenda prepared for the City of Riverview Monthly Board Meeting scheduled for May 22, 2025.
20. A true and correct copy of the Second Request is attached as **Exhibit B**.

Riverview rebuffs repeated efforts to encourage its compliance with the Sunshine Act.

21. On May 21, 2025, FIRE attorney Adam Steinbaugh sent an email to Mayor Cornell via the email listed on Riverview's website and CityHall@riverviewmo.org.

22. Steinbaugh's May 21 email explained that he had not received a response to the First Request and explained to Mayor Cornell that the Sunshine Act required a response to a public records request within three business days. § 610.023.3, R.S.Mo.

23. That afternoon, Riverview City Clerk Crystal Sauls responded via email, acknowledging her awareness of Riverview's obligations under the Sunshine Act.

24. Crystal Sauls' May 21 response stated: "I have received the 1st request for information on Monday May 19,2025 at 2:37pm, I have 72 hours from receipt of this request to respond. This email is acknowledgment of receipt. Please allow me some time to gather this information."

25. On May 23, 2025, after receiving no further response from Riverview, Steinbaugh again emailed Mayor Cornell, reminding him a second time of Riverview's obligations under the Sunshine Act and pointing out that Riverview had failed to provide a proper and timely response to either of the two requests.

26. Steinbaugh's May 23 email also explained that the requested records are easily accessible to Mayor Cornell (who has access to his recent communications about the subpoena) and to Riverview's clerk (who has access to recent agendas and minutes).

27. On May 28, 2025, after receiving no further response, Steinbaugh again emailed Mayor Cornell, reminding him a third time of Riverview's obligations.

28. Steinbaugh's May 28 email reminded Mayor Cornell that failing to respond to Sunshine Act requests may lead to an attorney fee award and civil penalties. § 610.027(3)-(4), R.S.Mo.

29. On June 1, 2025, Steinbaugh emailed Ms. Sauls and Mayor Cornell, asking for a written statement for the grounds of the constructive denials of access to records responsive to the First Request and the Second Request.

30. A true and correct copy of the emails exchanged between Steinbaugh, Ms. Sauls, and Mayor Cornell is attached as **Exhibit C**.

31. Aside from Ms. Sauls' May 21 acknowledgment of receipt of the First Request, Riverview has not responded to the First Request.

32. Riverview has not responded to the Second Request at all.

33. Riverview has not responded to the June 1 request for a written statement for the grounds of the denial of access to either request.

COUNT I

(Violation of the Sunshine Law under § 610.027.1, R.S.Mo.) (As to the First Request — Against All Defendants)

34. Plaintiff FIRE incorporates by reference all allegations set forth above as if fully set forth in this Count.

35. The First Request seeks copies of public records as defined by the Sunshine Law. § 610.010(6), R.S.Mo.

36. The responsive records are presumptively open unless shown to be exempt from disclosure by a specific statutory provision. § 610.022(5), R.S.Mo.

37. Upon receipt of a request, the custodian of a public body must act upon the request "as soon as possible, but in no event later than the end of the third business day" after receipt. Documents must be produced within three days of receipt of the request. If the custodian cannot grant access "immediately," the custodian must "give a detailed explanation" of the "reasonable cause" for the delay and state "the earliest time and date that the record will be available for inspection." § 610.023(3), R.S.Mo.

38. Riverview and Mayor Cornell did not immediately produce records responsive to the First Request.

39. Riverview and Mayor Cornell did not provide a detailed explanation within three business days of any cause for delay in producing records responsive to the First Request.

40. Riverview and Mayor Cornell did not identify the place and the earliest time and date the records responsive to the First Request would be made available.

41. Riverview denied access to open records responsive to the First Request, in violation of the Sunshine Law.

42. Mayor Cornell denied access to open records responsive to the First Request, in violation of the Sunshine Law.

43. The Sunshine Law required Riverview to provide, upon request, a written statement of the grounds for denial of access to records responsive to the First Request within three business days of the request for the statement. § 610.023(4), R.S.Mo.

44. Plaintiff FIRE requested a written statement of the grounds for denial of access to records responsive to the First Request.

45. Riverview did not provide a written statement of the grounds for denial of access to records responsive to the First Request within three business days.

46. By failing to identify the statutory reasons for the denial of the First Request, Riverview waived any discretionary exceptions under the Sunshine Law.

47. This Court may issue injunctive relief to enforce the disclosure obligations of Riverview and Mayor Cornell with respect to the First Request. § 610.030, R.S.Mo.; *see also MacLachlan v. McNary*, 684 S.W.2d 534, 539 (Mo. App. E.D. 1985).

48. Plaintiff FIRE lacks an adequate remedy at law in any action for damages, and Plaintiff FIRE and the public are being irreparably harmed by the Defendants' refusal to comply with the Sunshine Law with respect to the First Request.

49. Plaintiff FIRE has an existing, clear, and unconditional right of access to nonexempt portions of the records responsive to the First Request.

50. Riverview and Mayor Cornell have a non-discretionary, ministerial duty to follow the mandatory provisions of the Sunshine Law and to release the records responsive to the First Request.

51. A justiciable dispute and controversy exists between Plaintiff FIRE and Defendants Riverview and Mayor Cornell over the Defendants' obligations to disclose records responsive to the First Request.

52. Plaintiff FIRE has a legally protectable interest under the Sunshine Law in accessing the records responsive to the First Request.

53. The dispute and controversy between Plaintiff FIRE and Defendants Riverview and Mayor Cornell is ripe for judicial determination.

54. Under § 527.010, R.S.Mo., this Court has jurisdiction and authority to declare the respective rights and obligations of Plaintiff FIRE and Defendants Riverview and Mayor Cornell in and to the records responsive to the First Request.

55. Riverview's denial of access to records responsive to the First Request was a knowing violation of the Sunshine Law.

56. Riverview is subject to a civil penalty due to its knowing or purposeful violation of the Sunshine Law in connection with the First Request. § 610.027(3)–(4), R.S.Mo.

57. FIRE is entitled to an award of its costs and reasonable attorney fees in connection with this action due to Riverview's knowing or purposeful violation of the Sunshine Law in connection with the First Request. § 610.027(3)–(4), R.S.Mo.

58. Mayor Cornell's denial of access to records responsive to the First Request was a knowing violation of the Sunshine Law.

59. Mayor Cornell's denial of access to records responsive to the First Request was a purposeful violation of the Sunshine Law.

60. Mayor Cornell is subject to a civil penalty due to his knowing or purposeful violation of the Sunshine Law in connection with the First Request. § 610.027(3)–(4).

61. FIRE is entitled to an award of its costs and reasonable attorney fees in connection with this action due to Mayor Cornell's knowing or purposeful violation of the Sunshine Law in connection with the First Request. § 610.027(3)–(4).

WHEREFORE, Plaintiff FIRE requests this Court enter a judgment requiring Defendants City of Riverview and Mayor Cornell to immediately release the records responsive to the First Request; declaring that Defendants City of Riverview and Mayor Cornell knowingly and purposefully violated the Sunshine Act; awarding Plaintiff FIRE its costs and attorneys' fees; and granting such other and further relief as set forth in the PRAYER FOR RELIEF.

COUNT II

**(Violation of the Sunshine Law under § 610.027.1, R.S.Mo.)
(As to the Second Request — Against Defendant City of Riverview)**

62. Plaintiff FIRE incorporates by reference all allegations set forth above as if fully set forth in this Count.

63. The Second Request seeks copies of public records as defined by the Sunshine Law. § 610.010(6), R.S.Mo.

64. Riverview did not immediately produce records responsive to the Second Request.

65. Riverview did not provide a detailed explanation within three business days of any cause for delay in producing records responsive to the Second Request.

66. Riverview denied access to open records responsive to the Second Request, in violation of the Sunshine Law.

67. Plaintiff FIRE requested a written statement of the grounds for denial of access to records responsive to Second Request.

68. Riverview did not provide a written statement of the grounds for denial of access to records responsive to the Second Request within three business days.

69. By failing to identify the statutory reasons for the denial of the Second Request, Riverview waived any discretionary exceptions under the Sunshine Law.

70. This Court may issue injunctive relief to enforce the disclosure obligations of Riverview with respect to the Second Request; § 610.030, R.S.Mo.; *see also MacLachlan*, 684 S.W.2d at 539.

71. Plaintiff FIRE lacks an adequate remedy at law in any action for damages, and Plaintiff FIRE and the public are being irreparably harmed by Riverview's refusal to comply with the Sunshine Law with respect to the Second Request.

72. Plaintiff FIRE has an existing, clear, and unconditional right of access to nonexempt portions of the records responsive to the Second Request.

73. Riverview has a non-discretionary, ministerial duty to follow the mandatory provisions of the Sunshine Law and to release the records responsive to the Second Request.

74. A justiciable dispute and controversy exists between Plaintiff FIRE and Riverview over Riverview's obligations to disclose records responsive to the Second Request.

75. Plaintiff FIRE has a legally protectable interest under the Sunshine Law in accessing the records responsive to the Second Request.

76. The dispute and controversy between Plaintiff FIRE and Riverview is ripe for judicial determination.

77. Under § 527.010, R.S.Mo., this Court has jurisdiction and authority to declare the respective rights and obligations of Plaintiff FIRE and Riverview in and to the records responsive to the Second Request.

78. Riverview's denial of access to records responsive to the Second Request was a knowing violation of the Sunshine Law.

79. Riverview is subject to a civil penalty due to its knowing or purposeful violation of the Sunshine Law in connection with the Second Request. § 610.027(3)–(4).

80. FIRE is entitled to an award of its costs and reasonable attorney fees in connection with this action due to Riverview's knowing or purposeful violation of the Sunshine Law in connection with the Second Request. § 610.027(3)–(4).

WHEREFORE, Plaintiff FIRE requests this Court enter a judgment requiring Defendant City of Riverview to immediately release the records responsive to the Second Request; declaring that Defendant City of Riverview knowingly and purposefully violated the Sunshine Act; awarding Plaintiff FIRE its costs and attorneys' fees; and granting such other and further relief as set forth in the PRAYER FOR RELIEF.

PRAYER FOR RELIEF

For these reasons, Plaintiff FIRE respectfully asks this Court to enter judgment in favor of FIRE and against Riverview and Mayor Cornell, and:

- a) Declare that Riverview violated the Sunshine Law with respect to the First Request and the Second Request;

- b) Declare that Mayor Cornell violated the Sunshine Law with respect to the First Request;
- c) Enter an injunction pursuant to § 610.030, R.S.Mo., requiring Riverview and Mayor Cornell to immediately produce all records responsive to the First Request;
- d) Enter an injunction pursuant to § 610.030, R.S.Mo., requiring Riverview to immediately produce all records responsive to the Second Request;
- e) Declare that Riverview has purposely violated the Sunshine Law or, alternatively, that Riverview has knowingly violated the Sunshine Law, with respect to the First and Second Request;
- f) Declare that Mayor Cornell has purposely violated the Sunshine Law or, alternatively, that Mayor Cornell has knowingly violated the Sunshine Law, with respect to the First Request;
- g) Impose a civil penalty against Riverview pursuant to the Sunshine Law;
- h) Impose a civil penalty against Mayor Cornell pursuant to the Sunshine Law;
- i) Award Plaintiff FIRE its costs and reasonable attorneys' fees; and
- j) Grant Plaintiff FIRE such other and further relief as is just and proper.

Dated: June 26, 2025

Respectfully submitted,

/s/ Erich V. Vieth

Erich V. Vieth, No. 29850MO

20 S. Sarah St.

St. Louis, MO 63108

314-604-3454

erichviethattorney@gmail.com

Adam B. Steinbaugh (Penn. 326475)*

FOUNDATION FOR INDIVIDUAL RIGHTS AND

EXPRESSION (FIRE)
510 Walnut St., Suite 900
Philadelphia, PA 19106
Tel: (215) 717-3473
Email: adam@thefire.org

**Pro hac vice* application forthcoming

**Attorneys for Plaintiff
Foundation for Individual Rights and
Expression (FIRE)**

EXHIBIT A



Adam Steinbaugh <adam@thefire.org>

Sunshine Request

Adam Steinbaugh <adam@thefire.org>
To: CityHall@riverviewmo.org

Thu, May 15, 2025 at 12:38 PM

To Whom It May Concern:

This is a request for the following records pursuant to the Missouri Sunshine Law (Mo. Rev. Stat. §§ 610.010-.035) and the Public Records Law (Mo. Rev. Stat. §§ 109.180-.190).

The Sunshine Law requires a response as soon as possible, and in no event later than the end of the third business day following the date the request is received by the custodian. (Mo. Rev. Stat. § 610.023.3).

I request:

1. Any communications to or from Michael Cornell concerning James Carroll.
2. Any communications to or from Michael Cornell that mention any of the following terms: James, Carroll, basement, Facebook, Nextdoor, "next door", subpoena, incitement, inciting, slander, libel, defamation, bully, bullying, or cyber.
3. Any communications between the City of Riverside and Daryl Brooks and/or The Whole Truth Investigative Group.

These requests are limited to communications sent or received on or after April 1, 2025.

"Communications" means and includes emails, text messages, social media messages, letters, memoranda, calendar entries, chats, or any form of one-to-one or one-to-many communication.

Please note that this request seeks public records wherever they may be found, including on devices or networks owned or operated by private parties. For example, if an employee uses a personal cell phone or social media account to conduct public business, records created, maintained, or held on the phone or account are public records subject to this request.

Additionally, if any specific categories of requested records will require a significantly longer production time than those in other categories, please provide records for each category on a piecemeal basis, as they become available.

Additionally, if any specific categories of requested records will require a significantly longer production time than those in other categories, please provide records for each category on a piecemeal basis, as they become available.

Request for Privilege Log: If any otherwise responsive documents are withheld on the basis that they are privileged or fall within a statutory exemption, please provide a privilege log setting forth (1) the subject matter of the document; (2) the person(s) who sent and received the document; (3) the date the document was created or sent; and (4) the basis on which the document is withheld.

Thank you,

Adam B. Steinbaugh

Attorney*

Foundation for Individual Rights and Expression

510 Walnut Street

Suite 900

Philadelphia, PA 19106

(215) 717-3473

adam@thefire.org

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* Admitted in California and Pennsylvania

EXHIBIT B



Adam Steinbaugh <adam@thefire.org>

Second Sunshine Request

Adam Steinbaugh <adam@thefire.org>
To: CityHall@riverviewmo.org
Cc: MikeCornell@cityofriverviewmo.org

Mon, May 19, 2025 at 3:36 PM

To Whom It May Concern:

This is a request for the following records pursuant to the Missouri Sunshine Law (Mo. Rev. Stat. §§ 610.010-.035) and the Public Records Law (Mo. Rev. Stat. §§ 109.180-.190).

The Sunshine Law requires a response as soon as possible, and in no event later than the end of the third business day following the date the request is received by the custodian. (Mo. Rev. Stat. § 610.023.3).

I request:

1. Any agenda, tentative agenda, notice of meeting, minutes, or other records prepared for use at a hearing or meeting at Riverview City Hall on April 16, 2025, at 4:00 p.m., as referenced in the subpoena to James Carroll.
2. Any agenda, tentative agenda, minutes, or recording of the meeting at which the subpoena to James Carroll was proposed, voted on, discussed, or adopted.
3. Any agenda or tentative agenda prepared for the City of Riverview Monthly Board Meeting scheduled for May 22, 2025.

Request for Privilege Log: If any otherwise responsive documents are withheld on the basis that they are privileged or fall within a statutory exemption, please provide a privilege log setting forth (1) the subject matter of the document; (2) the person(s) who sent and received the document; (3) the date the document was created or sent; and (4) the basis on which the document is withheld.

Thank you,

Adam B. Steinbaugh
Attorney*
Foundation for Individual Rights and Expression
510 Walnut Street
Suite 900
Philadelphia, PA 19106
(215) 717-3473
adam@thefire.org

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* Admitted in California and Pennsylvania

EXHIBIT C



Adam Steinbaugh <adam@thefire.org>

Sunshine Request

Adam Steinbaugh <adam@thefire.org>

Sun, Jun 1, 2025 at 4:54 AM

To: Crystal Sauls <cityhall@riverviewmo.org>, MikeCornell@cityofriverviewmo.org

Ms. Sauls --

This is a request for a written statement of the grounds for denial of access to the records requested by my Sunshine Law requests of May 15, 2025, and May 19, 2025. The Sunshine Law requires a written statement of the "specific provision of law under which access is denied" and must be provided "no later than the end of the third business day" after this request is received (Mo. Rev. Stat. 610.023(4)).

If the City of Riverview is represented by counsel, please put me in touch with them.

Thank you,

Adam B. Steinbaugh

Attorney*

Foundation for Individual Rights and Expression

510 Walnut Street

Suite 900

Philadelphia, PA 19106

(215) 717-3473

adam@thefire.org

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** Admitted in California and Pennsylvania*

On Wed, May 28, 2025 at 11:29AM Adam Steinbaugh <adam@thefire.org> wrote:

Mayor Cornell --

I have not received any further response to either of my Sunshine Act requests. A knowing violation of the Sunshine Act subjects the City of Riverview to an attorney fee award and civil penalties -- up to \$1,000 (for a knowing violation) or \$5,000 (for a purposeful violation) -- if I am forced to seek judicial intervention. Mo.Rev.Stat. § 610.027(3)-(4). You are aware that the City of Riverview was required to provide a response within 72 hours, did not do so, and have not responded to my efforts to obtain the City of Riverview's compliance. In addition, these are records that are immediately available to you, and the City of Riverview's refusal to provide them strongly suggests that its evasion is purposeful.

I am confident that you share my strong interest in avoiding an enforcement action. You can do so by expeditiously complying with the Sunshine Law.

Please apprise me **by the close of business today** as to when I can expect to receive a response or responsive records. If there is some reason that you need additional time to comply with these requests, please inform me today.

Thank you,

Adam B. Steinbaugh

Attorney*

Foundation for Individual Rights and Expression

510 Walnut Street

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(215) 717-3473

adam@thefire.org

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** Admitted in California and Pennsylvania*

On Fri, May 23, 2025 at 3:24 PM Adam Steinbaugh <adam@thefire.org> wrote:
Mayor Cornell --

I have not received a response to either my May 15 or May 19 Sunshine Law requests. Ms. Sauls acknowledged receipt of the former and that the City of Riverview's response was due yesterday.

These requests seek information that should be immediately available to you and easy to provide. In particular, the May 19 request seeks copies of agendas of meetings held last month and yesterday. And if there were some reason those records could not have been provided within the three-day deadline, the City of Riverview was required to provide a "detailed explanation" for that delay and identify the time and date those records would be made available. Mo. Rev. Stat. § 610.023.3. It did not do so.

Please advise.

Adam B. Steinbaugh
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Foundation for Individual Rights and Expression
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** Admitted in California and Pennsylvania*

On Wed, May 21, 2025 at 10:57 AM Adam Steinbaugh <adam@thefire.org> wrote:
Understood -- thank you!

Adam B. Steinbaugh
Attorney*
Foundation for Individual Rights and Expression
510 Walnut Street
Suite 900
Philadelphia, PA 19106
(215) 717-3473
adam@thefire.org

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** Admitted in California and Pennsylvania*

On Wed, May 21, 2025 at 10:55AM Crystal Sauls <cityhall@riverviewmo.org> wrote:

I have received the 1st request for information on Monday May 19,2025 at 2:37pm, I have 72 hours from receipt of this request to respond. This email is acknowledgment of receipt. Please allow me some time to gather this information.

On 05/21/2025 9:12 AM CDT Adam Steinbaugh <adam@thefire.org> wrote:

Mayor Cornell --

On May 15, I sent the below request under the Missouri Sunshine Law and Public Records Law to the City of Riverview.

Under Missouri Revised Statutes [section 610.023.3](#), the City of Riverview is required to act on that request "as soon as possible, but in no event later than the end of the third business day following" its receipt. In the event that access "is not granted immediately," the City of Riverview is required to provide "a detailed explanation of the cause for further delay and the place and earliest time and date that the record will be available for inspection," a date that can only "exceed three days for reasonable cause."

I have not received responsive records, an explanation for the delay, a statement of the date and time the records will be made available, or a written statement of any grounds for denial of access.

Please ensure that the responsive records are produced no later than the close of business on May 22, 2025.

Thank you,

Adam B. Steinbaugh

Attorney*

Foundation for Individual Rights and Expression

510 Walnut Street

Suite 900

Philadelphia, PA 19106

(215) 717-3473

adam@thefire.org

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* Admitted in California and Pennsylvania

Crystal Sauls, City Clerk

City of Riverview

phone: 314-868-0700 ext. 13

email: cityhall@riverviewmo.org

website: <https://cityofriverviewmo.org/>