Special Meeting of the Plymouth Township Historic District Commission
Wednesday, October 23, 2019 - 7 p.m.
AGENDA

Next Meeting date December 5, 2019

1) **CALL TO ORDER**
   a) **Board member roll call**

2) **Approval of the October 23, 2019 agenda**

3) **Enactment of the Consent Agenda**
   a) **Approval of the September 26, 2019 Meeting Minutes**

4) **Board member comments**

5) **NEW BUSINESS**

   a) **Historic District Creation Flow Chart**- *Wendy*

      1. Review the draft flow chart

   b) **Plymouth Tourism Brochure** - *Jack*

   c) **Discussions on the Open Meetings Act**- *Laura*
      1. Communication from the Township Attorney, dated April 6, 2017 (originally provided to the Planning Commission but applicable to other appointed bodies); and the
      2. Open Meetings Act Handbook.

6) **OLD BUSINESS**

   a) **Fee Schedule 2nd review**- *Laura and Jack*

   b) **Web site text 2nd review** - *Wendy* .

7) **PUBLIC COMMENTS AND QUESTIONS**

8) **ADJOURNMENT**

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING
OCTOBER 23, 2019

ITEM 1 - CALL TO ORDER
OCTOBER 23, 2019

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING
OCTOBER 23, 2019

ITEM 1-A

ROLL CALL

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING – OCTOBER 23, 2019

ROLL CALL

_____**Wendy Harless, *Chair***

_____ **Dennis Cebulski**

_____**Jack Dempsey**

_____**Kevin Gurtowsky**

_____**Sybil Hunter**

_____**James Salamay**

_____**Carol Souchock**

_____**Laura Haw, *Consultant***

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING
OCTOBER 23, 2019

ITEM 2

APPROVAL OF AGENDA

Special Meeting of the Plymouth Township Historic District Commission
Wednesday, October 23, 2019 - 7 p.m.
AGENDA

Next Meeting date December 5, 2019

1) **CALL TO ORDER**
   a) **Board member roll call**

2) **Approval of the October 23, 2019 agenda**

3) **Enactment of the Consent Agenda**
   a) **Approval of the September 26, 2019 Meeting Minutes**

4) **Board member comments**

5) **NEW BUSINESS**

   a) **Historic District Creation Flow Chart**- *Wendy*

      1. Review the draft flow chart

   b) **Plymouth Tourism Brochure** - *Jack*

   c) **Discussions on the Open Meetings Act**- *Laura*
      1. Communication from the Township Attorney, dated April 6, 2017 (originally provided to the Planning Commission but applicable to other appointed bodies); and the
      2. Open Meetings Act Handbook.

6) **OLD BUSINESS**

   a) **Fee Schedule 2nd review**- *Laura and Jack*

   b) **Web site text 2nd review** - *Wendy*

7) **PUBLIC COMMENTS AND QUESTIONS**

8) **ADJOURNMENT**

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING
OCTOBER 23, 2019

ITEM 3

ENACTMENT OF CONSENT AGENDA

APPROVAL OF MINUTES
REGULAR MEETING – SEPTEMBER 26, 2019

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING
OCTOBER 23, 2019

ITEM 4

BOARD MEMBER COMMENTS

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING
OCTOBER 23, 2019

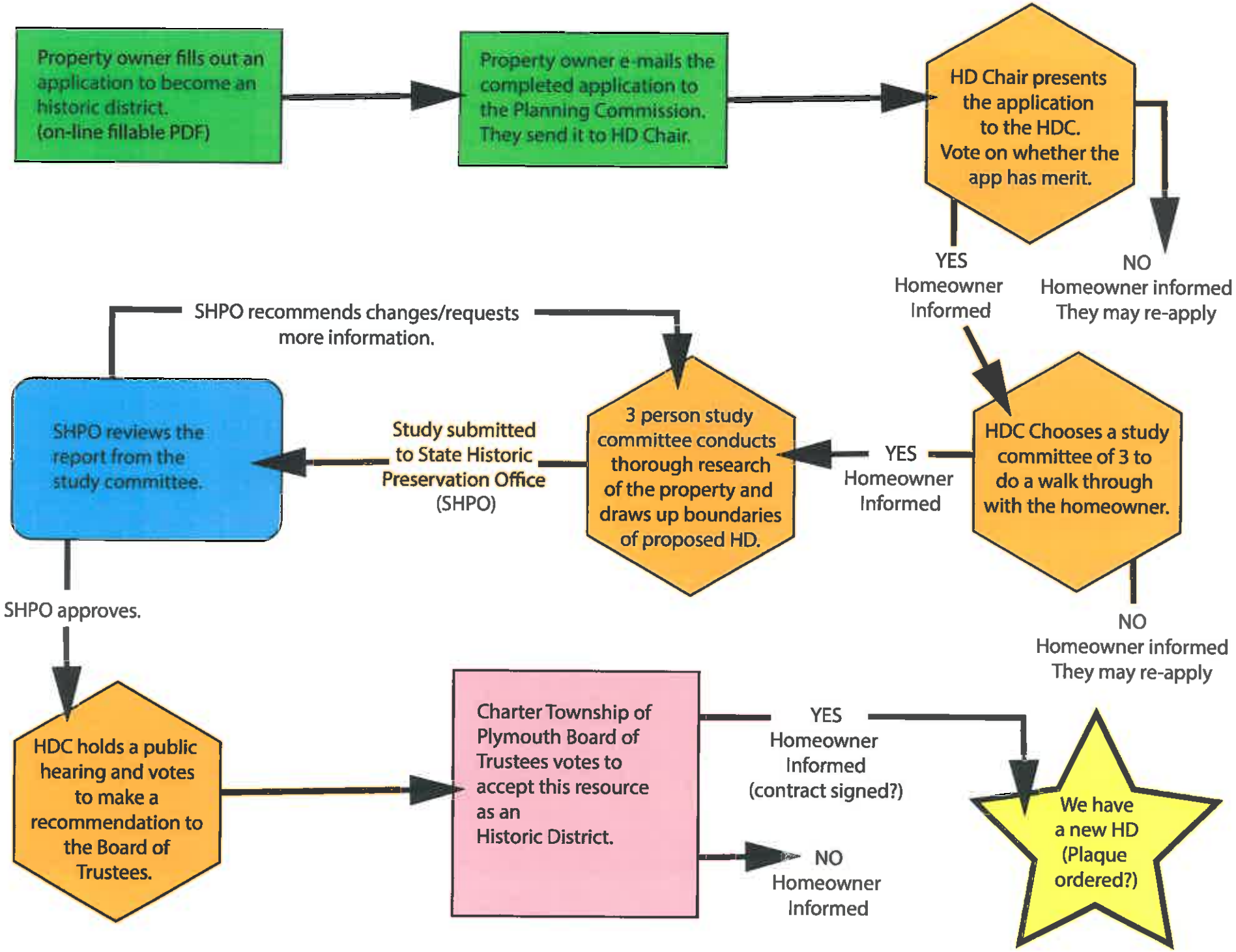
ITEM 5

NEW BUSINESS

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING
OCTOBER 23, 2019

ITEM 5 - A

HISTORIC DISTRICT CREATION FLOW CHART


Property owner fills out an application to become an historic district. (on-line fillable PDF)
Property owner e-mails the completed application to the Planning Commission. They send it to HD Chair.
HD Chair presents the application to the HDC. Vote on whether the app has merit.
YES Homeowner Informed
NO Homeowner informed They may re-apply
HDC Chooses a study committee of 3 to do a walk through with the homeowner.
YES Homeowner Informed
NO Homeowner informed They may re-apply
3 person study committee conducts thorough research of the property and draws up boundaries of proposed HD.
Study submitted to State Historic Preservation Office (SHPO)
SHPO reviews the report from the study committee.
SHPO recommends changes/requests more information.
SHPO approves.
HDC holds a public hearing and votes to make a recommendation to the Board of Trustees.
Charter Township of Plymouth Board of Trustees votes to accept this resource as an Historic District.
YES Homeowner Informed (contract signed?)
NO Homeowner Informed
We have a new HD (Plaque ordered?)

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING
OCTOBER 23, 2019

ITEM 5 – B

PLYMOUTH TOURISM BROUCHURE

CHARTER TOWNSHIP OF PLYMOUTH
HISTORIC DISTRICT COMMISSION
SPECIAL MEETING
OCTOBER 23, 2019

ITEM 5 - C

DISCUSSION ON THE OPEN MEETINGS ACT

Item 5-C #1

Memo

Confidential Attorney/Client
Privileged Information

To: Dennis J. Cebulski, Planning Commission

From: Kevin L. Bennett

Date: April 6, 2017

Re: Electronic Mail and the Open Meetings Act

You have requested an opinion on whether Planning Commissioners violate the Open Meetings Act by sending electronic mail to each other.

Some pertinent provisions of the Open Meetings Act (OMA) include:

- The Open Meeting Act requires that all "meetings" of a "public body" must be open to the public and held in a place available to the general public. MCL 15.263(1).

- A "public body" is defined as: "any state or local legislative or governing body, including a board, commission, committee, subcommittee, authority, or council, that is empowered by state constitution, statute, charter, ordinance, resolution, or rule to exercise governmental or proprietary authority or perform a governmental or proprietary function . . . . MCL 15.262(a). **This would include the Planning Commission.**

- A "meeting" is defined as: "the convening of a public body at which a quorum is present for the purpose of *deliberating toward* or rendering a decision on a public policy . . . ." MCL 15.262(b) (emphasis supplied).

- Although the OMA does not specifically define "deliberations," the dictionary definition of that term is "a discussion and consideration by a group of persons (as a jury or legislature) of the reasons for and against a measure." *Merriam Webster Online Dictionary*. All deliberations of a public body constituting a quorum of its members must take place at a meeting open to the public. MCL 15.263(3).

- A "quorum" is present when a majority (at least four out of seven) of the Commissioners convene.

Thus, the OMA's requirements are invoked for the Planning Commission when the following elements are present: (1) a quorum, (2) deliberation or rendering of a decision, (3) on a matter of public policy." *Ryant v Cleveland Twp*, 239 Mich App 430, 434; 608 NW2d 101 (2000).

With specific respect to electronic mail, a recent panel of the Michigan Court of Appeals has ruled that **e-mail regarding matters of public policy circulated by one or more commissioners to at least four commissioners may be a violation of the OMA.** *Markel v Mackley*, unpublished opinion per curiam of the Court of Appeals, decided November 1, 2016 (Docket No. 327617). In *Markel*, four members of a seven-member elected public body engaged in numerous email exchanges regarding matters of public policy which would soon come before the public body for consideration. Three of the members on the group emails actively exchanged thoughts and plans to handle the matters. The fourth member on the group emails simply received the emails but did not actively engage in the exchange.[1] The court ruled that under these circumstances, the members each violated the OMA. The court further ruled that each alleged violation would have to be analyzed on a case by case basis.

This analysis would appear equally applicable to text messages.

To defer on the side of caution, **I recommend that each Commissioner avoid sending e-mail (or text) communications to three or more other Commissioners, but only if the substance of the email concerns deliberations or discussions on matters of public policy**.

With specific respect to the voluminous commentary mentioned in your email, the commentary clearly appears to pertain to public policy. As such, if the Commissioner would have e-mailed the commentary to each other Commissioner, and none of the other Commissioners responded, it is questionable if that e-mail would have constituted an OMA violation. If the recipient-Commissioners responded to the email, the more the number of responses the more likely such e-mails would constitute an OMA violation. I would submit that the Commissioner's reluctance to submit the commentary prior to the public meeting was probably correct.

A practical solution to an occurrence such as this would be to adjourn the ultimate decision on the issue to the next regularly scheduled meeting, if possible. If such adjournment was possible, each Commissioner could take the time to **individually** review and contemplate the points made in the commentary. However, the Commissioners should be very leery about discussing the "public policy" with other Commissioners in a subquorum committee for the sole purpose of avoiding OMA violations. Michigan courts have ruled that a public body cannot avoid the OMA by deliberately dividing itself into groups of less than a quorum and still deliberate on public policy. *Booth Newspapers, Inc v Wyoming City Council*, 168 Mich App 459, 425 NW2d 695 (1988).

Please do not hesitate to contact me if you have any questions or comments.

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[1] This summary of facts of *Markel* was taken from the Michigan Municipal League's "Fact Sheet" on the case.

Item 5C - #2

OPEN MEETINGS ACT HANDBOOK

Attorney General Bill Schuette

The Handbook is intended to be a quick reference guide. It is not intended to be encyclopedic on every subject or resolve every situation that may be encountered.

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OPEN MEETINGS ACT

THE BASICS

The Act – the Open Meetings Act (OMA) is 1976 PA 267, MCL 15.261 through 15.275. The OMA took effect January 1, 1977. In enacting the OMA, the Legislature promoted a new era in governmental accountability and fostered openness in government to enhance responsible decision making.[1]

Nothing in the OMA prohibits a public body from adopting an ordinance, resolution, rule, or charter provision that requires a greater degree of openness relative to public body meetings than the standards provided for in the OMA.[2]

What bodies are covered? – the OMA applies to all meetings of a public body.[3] A "public body" is broadly defined as:

> [A]ny state or local legislative or governing body, including a board, commission, committee, subcommittee, authority, or council, that is empowered by state constitution, statute, charter, ordinance, resolution, or rule to *exercise governmental or proprietary authority or perform a governmental or proprietary function*; a lessee of such a body performing an essential public purpose and function pursuant to the lease agreement.[4] [Emphasis added.]

As used in the OMA, the term "public body" connotes a collective entity and does not include an individual government official.[5] The OMA does not apply to private, nonprofit corporations.[6]

Public notice requirements – a meeting of a public body cannot be held unless public notice is given consistent with the OMA.[7] A public notice must contain the public body's name, telephone number, and address, and must be posted at its principal office and any other locations

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[1] *Booth Newspapers, Inc v Univ of Michigan Bd of Regents*, 444 Mich 211, 222-223; 507 NW2d 422 (1993).
[2] MCL 15.261.
[3] MCL 15.263. When the Handbook refers to a "board," the term encompasses all boards, commissions, councils, authorities, committees, subcommittees, panels, and any other public body.
[4] MCL 15.262(a). The provision in the OMA that includes a lessee of a public body performing an essential public purpose is unconstitutional because the title of the act does not refer to organizations other than "public bodies." OAG, 1977-1978, No 5207, p 157 (June 24, 1977). Certain boards are excluded "when deliberating the merits of a case." MCL 15.263(7). See also MCL 15.263(8) and (10).
[5] *Herald Co v Bay City*, 463 Mich 111, 129-133; 614 NW2d 873 (2000) – a city manager is not subject to the OMA. *Craig v Detroit Public Schools Chief Executive Officer*, 265 Mich App 572, 579; 697 NW2d 529 (2005). OAG, 1977-1978, No 5183A, p 97 (April 18, 1977).
[6] OAG, 1985-1986, No 6352, p 252 (April 8, 1986) – the Michigan High School Athletic Association is not subject to the OMA. See also *Perlongo v Iron River Cooperative TV Antenna Corp*, 122 Mich App 433; 332 NW2d 502 (1983).
[7] MCL 15.265(1). *Nicholas v Meridian Charter Twp*, 239 Mich App 525, 531; 609 NW2d 574 (2000).

the public body considers appropriate.[8] If a public body is a part of a state department, a public notice must also be posted in the principal office of the state department.[9]

Public notice requirements are specific to the type of meeting:

> (1) For regular meetings of a public body, there shall be posted within 10 days after the first meeting of the public body in each calendar or fiscal year a public notice stating the dates, times, and places of its regular meetings.
>
> (2) For a change in schedule of regular meetings of a public body, there shall be posted within three days after the meeting at which the change is made, a public notice stating the new dates, times, and places of its regular meetings.
>
> (3) For a rescheduled regular or a special meeting of a public body, a public notice stating the date, time, and place of the meeting shall be posted at least 18 hours before the meeting.
>
> (4) A meeting of a public body which is recessed for more than 36 hours shall be reconvened only after public notice has been posted at least 18 hours before the reconvened meeting.[10]

At their first meeting of the calendar or fiscal year, each board must set the dates, times, and places of the board's regular meetings for the coming year. The OMA does not require any particular number of meetings. The board's schedule of regular meetings is not, of course, set in stone. The board is free to cancel or reschedule its meetings.

The minimum 18-hour notice requirement is not fulfilled if the public is denied access to the notice of the meeting for any part of the 18 hours.[11] The requirement may be met by posting at least 18 hours in advance of the meeting using a method designed to assure access to the notice. For example, the public body can post the notice at the main entrance visible on the outside of the building that houses the principal office of the public body.[12]

A public body must send copies of the public notices by first class mail to a requesting party, upon the party's payment of a yearly fee of not more than the reasonable estimated cost of printing and postage. Upon written request, a public body, at the same time a public notice of a meeting is posted, must provide a copy of the public notice to any newspaper published in the state or any radio or television station located in the state, free of charge.[13]

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[8] MCL 15.264(a)-(c).
[9] MCL 15.264(c).
[10] MCL 15.265(2)-(5).
[11] OAG, 1979-1980, No 5724, p 840 (June 20, 1980).
[12] OAG No 5724.
[13] MCL 15.266.

Agendas and the OMA – while the OMA requires a public body to give public notice when it meets, it has no requirement that the public notice include an agenda or a specific statement as to the purpose of a meeting.[14] No agenda format is required by the OMA.[15]

Penalties for OMA violations – a public official who "intentionally violates" the OMA may be found guilty of a misdemeanor[16] and may be personally liable for actual and exemplary damages of not more than $500 for a single meeting.[17] The exemptions in the OMA must be strictly construed. The "rule of lenity" (i.e., courts should mitigate punishment when the punishment in the criminal statute is unclear) does not apply to construction of the OMA's exemptions.[18]

A decision made by a public body may be invalidated by a court, if the public body has not complied with the requirements of MCL 15.263(1), (2), and (3) [i.e., making decisions at a public meeting] or if failure to give notice in accordance with section 5 has interfered with substantial compliance with MCL 15.263(1), (2), and (3) and the court finds that the noncompliance has impaired the rights of the public under the OMA.

Lawsuits to compel compliance – actions must be brought within 60 days after the public body's approved minutes involving the challenged decision are made publicly available.[19] If the decision involves the approval of contracts, the receipt or acceptance of bids, or the procedures pertaining to the issuance of bonds or other evidences of indebtedness, the action must be brought within 30 days after the approved minutes are made publicly available.[20] If the decision of a state public body is challenged, venue is in Ingham County.[21]

Correcting non-conforming decisions – in any case where a lawsuit has been initiated to invalidate a public body's decision on the ground that it was not made in conformity with the OMA, the public body may, without being deemed to make any admission contrary to its interest, reenact the disputed decision in conformity with the OMA. A decision reenacted in this manner shall be effective from the date of reenactment and is not rendered invalid by any deficiency in its initial enactment.[22] If the board acts quickly, the reenactment may defeat a claim for attorney's fees, since plaintiffs would not be successful in "obtaining relief in the action" within the meaning of the OMA.[23]

---

[14] OAG, 1993-1994, No 6821, p 199 (October 18, 1994). But, as discussed in OAG No 6821, other statutes may require a public body to state in its notice the business to be transacted at the meeting.
[15] *Lysogorski v Bridgeport Charter Twp*, 256 Mich App 297, 299; 662 NW2d 108 (2003).
[16] MCL 15.272.
[17] MCL 15.273.
[18] *People v Whitney*, 228 Mich App 230, 244; 578 NW2d 329 (1998).
[19] MCL 15.270(3)(a).
[20] MCL 15.270(3)(b).
[21] MCL 15.270(4).
[22] MCL 15.270(5).
[23] *Leemreis v Sherman Twp*, 273 Mich App 691, 700; 731 NW2d 787 (2007). *Felice v Cheboygan County Zoning Comm*, 103 Mich App 742, 746; 304 NW2d 1 (1981).

DECISIONS MUST BE MADE IN PUBLIC MEETINGS

All decisions must be made at a meeting open to the public – the OMA defines "decision" to mean "a determination, action, vote, or disposition upon a motion, proposal, recommendation, resolution, order, ordinance, bill, or measure on which a vote by members of a public body is required and by which a public body effectuates or formulates public policy."[24] The OMA provides that "[a]ll decisions of a public body shall be made at a meeting open to the public," and that, with limited exceptions, "[a]ll deliberations of a public body constituting a quorum of its members shall take place at a meeting open to the public."[25]

The OMA does not contain a "voting requirement" or any form of "formal voting requirement." A "consensus building process" that equates to decision-making would fall under the act.[26] For example, where board members use telephone calls or sub-quorum meetings to achieve the same intercommunication that could have been achieved in a full board or commission meeting, the members' conduct is susceptible to "round-the-horn" decision-making, which achieves the same effect as if the entire board had met publicly and formally cast its votes. A "round-the-horn" process violates the OMA.[27]

Meeting "informally" to discuss matters – while the OMA "does not apply to a meeting which is a social or chance gathering or conference not designed to avoid this act,"[28] a meeting of a public body must be open to the public. The OMA does not define the terms "social or chance gathering" or "conference," and provides little direct guidance as to the precise scope of this exemption.[29] To promote openness in government, however, the OMA is entitled to a broad interpretation and exceptions to conduct closed sessions must be construed strictly.[30] Thus, the closed session exception does not apply to a quorum of a public body that meets to discuss matters of public policy, even if there is no intention that the deliberations will lead to a decision on that occasion.[31]

Canvassing board members on how they might vote – an informal canvas by one member of a public body to find out where the votes would be on a particular issue does not violate the OMA,

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[24] MCL 15.262(d).
[25] MCL 15.263(2) and (3).
[26] *Booth Newspapers, Inc v Univ of Michigan Bd of Regents*, 444 Mich at 229.
[27] *Booth Newspapers, Inc*, 444 Mich at 229 – "any alleged distinction between the [public body's] consensus building and a determination or action, as advanced in the OMA's definition of 'decision,' is a distinction without a difference."
[28] MCL 15.263(10).
[29] OAG, 1981-1982, No 6074, p 662, 663 (June 11, 1982).
[30] *Wexford County Prosecutor v Pranger*, 83 Mich App 197, 201, 204; 268 NW2d 344 (1978).
[31] OAG, 1977-1978, No 5298, p 434, 435 (May 2, 1978). See also OAG, 1979-1980, No 5444, p 55, 56 (February 21, 1979) – anytime a quorum of a public body meets and considers a matter of public policy, the meeting must comply with the OMA's requirements. Compare OAG, 1979-1980, No 5437, p 36, 37 (February 2, 1979), where members of a public body constituting a quorum come together by chance, the gathering is exempt from the OMA; however, even at a chance meeting, matters of public policy may not be discussed by the members with each other.

so long as no decisions are made during the discussions and the discussions are not a deliberate attempt to the avoid the OMA.[32]

May a quorum of a board gather outside an open meeting without violating the OMA? – yes, in some instances. In addition to a purely social gathering or chance gathering[33] that does not involve discussions of public policy among the members of the board, a quorum may accept an invitation to address a civic organization,[34] listen to the concerns of a neighborhood organization, or observe demonstrations, if the board doesn't deliberate toward, or make, a decision.[35]

A board quorum also may meet for a workshop, seminar, informational gathering, or professional conference designed to convey, to the conference participants, information about areas of professional interest common to all conference participants.[36] These kinds of meetings involve a conference designed primarily to provide training or background information and involve a relatively broad focus upon issues of general concern, rather than a more limited focus on matters or issues of particular interest to a single public body.[37] However, when gatherings are designed to receive input from officers or employees of the public body, the OMA requires that the gathering be held at a public meeting.[38]

The OMA was not violated when several members of the board of county commissioners attended a public meeting of the county planning committee (which had more than fifty members, two who were county commissioners), which resulted in a quorum of the board being present at the meeting (without the meeting also being noticed as a county commission meeting), so long as the nonmember commissioners did not engage in deliberations or render decisions.[39]

Advisory committees and the OMA – the OMA does not apply to committees and subcommittees composed of less than a quorum of the full public body if they "are merely advisory or only capable of making 'recommendations concerning the exercise of governmental authority.'"[40]

Where, on the other hand, a committee or subcommittee is empowered to act on matters in such a fashion as to deprive the full public body of the opportunity to consider a matter, a decision of the committee or subcommittee "is an exercise of governmental authority which effectuates

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[32] *St Aubin v Ishpeming City Council*, 197 Mich App 100, 103; 494 NW2d 803 (1992).
[33] OAG, 1979-1980, No 5437, p 36 (February 2, 1979).
[34] OAG, 1977-1978, No 5183, p 21, 35 (March 8, 1977).
[35] OAG, 1977-1978, No 5364, p 606, 607 (September 7, 1978).
[36] OAG, 1979-1980, No 5433, p 29, 31 (January 31, 1979).
[37] OAG, 1981-1982, No 6074, at p 664.
[38] OAG No 5433 at p 31.
[39] OAG, 1989-1990, No 6636, p 253 (October 23, 1989), cited with approval in *Ryant v Cleveland Twp*, 239 Mich App 430, 434-435; 608 NW2d 101 (2000) and *Nicholas v Meridian Charter Twp*, 239 Mich App at 531-532. If, however, the noncommittee board members participate in committee deliberations, the OMA would be violated. *Nicholas*, 239 Mich App at 532.
[40] OAG, 1997-1998, No 6935, p 18 (April 2, 1997); OAG No 5183 at p 40.

public policy" and the committee or subcommittee proceedings are, therefore, subject to the OMA.[41]

If a joint meeting of two committees of a board (each with less than a quorum of the board) results in the presence of a quorum of the board, the board must comply in all respects with the OMA and notice of the joint meeting must include the fact that a quorum of the board will be present.[42]

Use of e-mail or other electronic communications among board members during an open meeting – e-mail, texting, or other forms of electronic communications among members of a board or commission during the course of an open meeting that constitutes deliberations toward decision-making or actual decisions violates the OMA, since it is in effect a "closed" session. While the OMA does not require that all votes by a public body must be by roll call, voting requirements under the act are met when a vote is taken by roll call, show of hands, or other method that informs the public of the public official's decision rendered by his or her vote. Thus, the OMA bars the use of e-mail or other electronic communications to conduct a secret ballot at a public meeting, since it would prevent citizens from knowing how members of the public body have voted.[43]

Moreover, the use of electronic communications for discussions or deliberations, which are not, at a minimum, able to be heard by the public in attendance at an open meeting are contrary to the OMA's core purpose – the promotion of openness in government.[44]

Using e-mail to distribute handouts, agenda items, statistical information, or other such material during an open meeting should be permissible under the OMA, particularly when copies of that information are also made available to the public before or during the meeting.

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[41] *Schmiedicke v Clare School Bd*, 228 Mich App 259, 261, 263-264; 577 NW2d 706 (1998); *Morrison v East Lansing*, 255 Mich App 505; 660 NW2d 395 (2003); and OAG, 1997-1998, No 7000, p 197 (December 1, 1998) – a committee composed of less than a quorum of a full board is subject to the OMA, if the committee is effectively authorized to determine whether items will or will not be referred for action by the full board, citing OAG, 1977-1978, No 5222, p 216 (September 1, 1977).

[42] OAG, 1989-1990, No 6636, at p 254.

[43] See *Esperance v Chesterfield Twp*, 89 Mich App 456, 464; 280 NW2d 559 (1979) and OAG, 1977-1978, No 5262, p 338 (January 31, 1978).

[44] See *Booth Newspapers, Inc*, 444 Mich at 229; *Schmiedicke*, 228 Mich App at 263, 264; and *Wexford County Prosecutor*, 83 Mich App at 204.

CLOSED SESSIONS

Meeting in closed session – a public body may meet in a closed session *only* for one or more of the permitted purposes specified in section 8 of the OMA.[45] The limited purposes for which closed sessions are permitted include, among others[46]:

> (1) To consider the dismissal, suspension, or disciplining of, or to hear complaints or charges brought against, or to consider a periodic personnel evaluation of, a public officer, employee, staff member, or individual agent, *if the named person requests a closed hearing*.[47]
>
> (2) For strategy and negotiation sessions connected with the negotiation of a collective bargaining agreement *if either negotiating party requests a closed hearing*.[48]
>
> (3) To consider the purchase or lease of real property up to the time an option to purchase or lease that real property is obtained.[49]
>
> (4) To consult with its attorney regarding trial or settlement strategy in connection with specific pending litigation, *but only if* an open meeting would have a detrimental financial effect on the litigating or settlement position of the public body.[50]
>
> (5) To review and consider the contents of an application for employment or appointment to a public office *if the candidate requests that the application remain confidential.* However, all interviews by a public body for employment or appointment to a public office shall be held in an open meeting pursuant to this act.[51]
>
> (6) To consider material exempt from discussion or disclosure by state or federal statute.[52] But note – a board is not permitted to go into closed session to discuss an attorney's oral opinion, as opposed to a written legal memorandum.[53]

A closed session must be conducted during the course of an open meeting – section 2(c) of the OMA defines "closed session" as "a meeting or part of a meeting of a public body that is

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[45] MCL 15.268. OAG, 1977-1978, No 5183, at p 37.
[46] The other permissible purposes deal with public primary, secondary, and post-secondary student disciplinary hearings – section 8(b); state legislature party caucuses – section 8(g); compliance conferences conducted by the Michigan Department of Community Health – section 8(i); and public university presidential search committee discussions – section 8(j).
[47] MCL 15.268(a) (Emphasis added.)
[48] MCL 15.268(c) (Emphasis added.)
[49] MCL 15.268(d).
[50] MCL 15.268(e) (Emphasis added.)
[51] MCL 15.268(f) (Emphasis added.)
[52] MCL 15.268(h).
[53] *Booth Newspapers, Inc v Wyoming City Council*, 168 Mich App 459, 467, 469-470; 425 NW2d 695 (1988).

closed to the public."[54] Section 9(1) of the OMA provides that the minutes of an open meeting must include "the purpose or purposes for which a closed session is held."[55]

Going into closed session – section 7(1) of the OMA[56] sets out the procedure for calling a closed session:

> A 2/3 roll call vote of members elected or appointed and serving is required to call a closed session, except for the closed sessions permitted under section 8(a), (b), (c), (g), (i), and (j). The roll call vote and the purpose or purposes for calling the closed session shall be entered into the minutes of the meeting at which the vote is taken.

Thus, a public body may go into closed session only upon a motion duly made, seconded, and adopted by a 2/3 roll call vote of the members appointed and serving[57] during an open meeting for the purpose of (1) considering the purchase or lease of real property, (2) consulting with their attorney, (3) considering an employment application, or (4) considering material exempt from disclosure under state or federal law. A majority vote is sufficient for going into closed session for the other OMA permitted purposes.

We suggest that every motion to go into closed session should cite one or more of the permissible purposes listed in section 8 of the OMA.[58] An example of a motion to go into closed session is:

> I move that the Board meet in closed session under section 8(e) of the Open Meetings Act, to consult with our attorney regarding trial or settlement strategy in connection with [the name of the specific lawsuit].

Another example is the need to privately discuss with the public body's attorney a memorandum of advice as permitted under section 8(h) of the OMA – "to consider material exempt from discussion or disclosure by state or federal statute."[59] The motion should cite section 8(h) of the OMA and the statutory basis for the closed session, such as section 13(1)(g) of the Freedom of Information Act, which exempts from public disclosure "[i]nformation or records subject to the attorney-client privilege."[60]

Leaving a closed session – the OMA is silent as to how to leave a closed session. We suggest that you recommend a motion be made to end the closed session with a majority vote needed for

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[54] MCL 15.262(c).
[55] MCL 15.269(1).
[56] MCL 15.267(1).
[57] And not just those attending the meeting. OAG No 5183 at p 37.
[58] MCL 15.268.
[59] MCL 15.268(h). Proper discussion of a written legal opinion at a closed meeting is, with regard to the attorney-client privilege exemption to the OMA, limited to the meaning of any strictly legal advice presented in the written opinion. *People v Whitney*, 228 Mich App at 245-248.
[60] MCL 15.243(1)(g).

approval. Admittedly, this is a decision made in a closed session, but it certainly isn't a decision that "effectuates or formulates public policy."

When the public body has concluded its closed session, the open meeting minutes should state the time the public body reconvened in open session and, of course, any votes on matters discussed in the closed session must occur in an open meeting.

Decisions must be made during an open meeting, not the closed session – section 3(2) of the OMA requires that "[a]ll decisions of a public body shall be made at a meeting open to the public."[61] Section 2(d) of the OMA defines "decision" to mean "a determination, action, vote, or disposition upon a motion, proposal, recommendation, resolution, order, ordinance, bill, or measure on which a vote by members of a public body is required and by which a public body effectuates or formulates public policy."[62]

Avoid using the terms "closed session" and "executive session" interchangeably – we suggest that a public body not use the term "executive session" to refer to a "closed session." The term "executive session" does not appear in the OMA, but "closed session" does. "Executive session" is more of a private sector term and is often used to describe a private session of a board of directors, which is not limited as to purpose, where actions can be taken, and no minutes are recorded.

Staff and others may join the board in a closed session – a public body may rely upon its officers and employees for assistance when considering matters in a closed session. A public body may also request private citizens to assist, as appropriate, in its considerations.[63]

Forcibly excluding persons from a closed session – a public body may, if necessary, exclude an unauthorized individual who intrudes upon a closed session by either (1) having the individual forcibly removed by a law enforcement officer, or (2) by recessing and removing the closed session to a new location.[64]

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[61] MCL 15.263(2). *St Aubin v Ishpeming City Council*, 197 Mich App at 103. See also, OAG, 1977-1978, No 5262, at p 338-339 – the OMA prohibits a voting procedure at a public meeting which prevents citizens from knowing how members of the public body have voted and OAG, 1979-1980, No 5445, p 57 (February 22, 1979) – a public body may not take final action on any matter during a closed meeting.
[62] MCL 15.262(d).
[63] OAG, 1979-1980, No 5532, p 324 (August 7, 1979).
[64] OAG, 1985-1986, No 6358, p 268 (April 29, 1986), citing *Regents of the Univ of Michigan v Washtenaw County Coalition Against Apartheid*, 97 Mich App 532; 296 NW2d 94 (1980).

PUBLIC ATTENDING OPEN MEETINGS

Excluding individuals – no one may be excluded from a meeting otherwise open to the public except for a breach of the peace actually committed at the meeting.[65]

Identifying public attendees – no one may be required to register or otherwise provide his or her name or other information or otherwise to fulfill a condition precedent to attend a public meeting.[66]

Building security at the meeting site may cause issues. Members of the public might object, based on the OMA, to signing in to gain access to the building where a public meeting is being held.[67] We, therefore, recommend that public bodies meet in facilities or areas not subject to public access restrictions.

If the public body wishes the members of the public to identify themselves at the meeting, we suggest the board chair announce something like this:

> The Board would appreciate having the members of the public attending the meeting today identify themselves and mention if they would like the opportunity to speak during the public comment period. However, you do not need to give your name to attend this meeting. When the time comes to introduce yourself and you do not want to do so, just say pass.

Since speaking at the meeting is a step beyond "attending" the public meeting and the OMA provides that a person may address the public body "under rules established and recorded by the public body," the board may establish a rule requiring individuals to identify themselves if they wish to speak at a meeting.[68]

Limiting public comment – a public body may adopt a rule imposing individual time limits for members of the public addressing the public body.[69] In order to carry out its responsibilities, the board can also consider establishing rules allowing the chairperson to encourage groups to designate one or more individuals to speak on their behalf to avoid cumulative comments. But a rule limiting the period of public comment may not be applied in a manner that denies a person the right to address the public body, such as by limiting all public comment to a half-hour period.[70]

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[65] MCL 15.263(6).
[66] MCL 15.263(4).
[67] In addition, "[a]ll meetings of a public body . . . shall be held in a place available to the general public." MCL 15.263(1).
[68] MCL 15.263(5). OAG, 1977-1978, No 5183, at p 34.
[69] OAG, 1977-1978, No 5332, p 536 (July 13, 1978). The rule must be duly adopted and recorded. OAG, 1977-1978. No 5183, at p 34.
[70] OAG No 5332 at p 538.

Meeting location – the OMA only requires that a meeting be held "in a place available to the general public;" it does not dictate that the meeting be held within the geographical limits of the public body's jurisdiction.[71] However, if a meeting is held so far from the public which it serves that it would be difficult or inconvenient for its citizens to attend, the meeting may not be considered as being held at a place available to the general public. Whenever possible, the meeting should be held within the public body's geographical boundaries.

Timing of public comment – a public body has discretion under the OMA when to schedule public comment during the meeting.[72] Thus, scheduling public comment at the beginning[73] or the end[74] of the meeting agenda does not violate the OMA. The public has no right to address the commission during its deliberations on a particular matter.[75]

Taping and broadcasting – the right to attend a public meeting includes the right to tape-record, videotape, broadcast live on radio, and telecast live on television the proceedings of a public body at the public meeting.[76] A board may establish reasonable regulations governing the televising or filming by the electronic media of a hearing open to the public in order to minimize any disruption to the hearing, but it may not prohibit such coverage.[77] And the exercise of the right to tape-record, videotape, and broadcast public meetings may not be dependent upon the prior approval of the public body.[78]

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[71] OAG, 1979-1980, No 5560, p 386 (September 13, 1979). Of course, local charter provisions or ordinances may impose geographical limits on public body meetings.
[72] MCL 15.263(5).
[73] *Lysogorski v. Bridgeport Charter Twp*, 256 Mich App at 302.
[74] OAG, 1979-1980, No 5716, p 812 (June 4, 1980).
[75] OAG, 1977-1978, No 5310, p 465, 468 (June 7, 1978).
[76] MCL 15.263(1).
[77] OAG, 1987-1988, No 6499, p 280 (February 24, 1988).
[78] MCL 15.263(1).

MINUTES

What must be in the minutes – at a minimum, the minutes must show the date, time, place, members present, members absent, any decisions made at a meeting open to the public, and the purpose or purposes for which a closed session is held. The minutes must include all roll call votes taken at the meeting.[79] The OMA does not prohibit a public body from preparing a more detailed set of minutes of its public meetings if it chooses to do so.[80]

When must the minutes be available – proposed minutes must be made available for public inspection within eight days after the applicable meeting. Approved minutes must be made available for public inspection within five days after the public body's approval.[81]

When must the minutes be approved – at the board's next meeting.[82] Corrected minutes must show both the original entry and the correction (for example, using a "strikethrough" word processing feature).

Closed session minutes – a separate set of minutes must be taken for closed sessions. While closed session minutes must be approved in an open meeting (with contents of the minutes kept confidential), the board may meet in closed session to consider approving the minutes.[83]

Closed session minutes shall only be disclosed if required by a civil action filed under sections 10, 11, or 13 of the OMA.[84] The board secretary may furnish the minutes of a closed session of the body to a board member. A member's dissemination of closed session minutes to the public, however, is a violation of the OMA, and the member risks criminal prosecution and civil penalties.[85] An audiotape of a closed session meeting of a public body is part of the minutes of the session meeting and, thus, must be filed with the clerk of the public body for retention under the OMA.[86]

Closed session minutes may be destroyed one year and one day *after approval of the minutes of the regular meeting at which the closed session occurred.*[87]

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[79] MCL 15.269(1).
[80] Informational letter to Representative Jack Brandenburg from Chief Deputy Attorney General Carol Isaacs dated May 8, 2003.
[81] MCL 15.269(3).
[82] MCL 15.269(1)
[83] OAG, 1985-1986, No 6365, p 288 (June 2, 1986). This, of course, triggers the need for more closed session minutes.
[84] MCL 15.270, 15.271, and 15.273; *Local Area Watch v Grand Rapids*, 262 Mich App 136, 143; 683 NW2d 745 (2004); OAG, 1985-1986 No 6353, p 255 (April 11, 1986).
[85] OAG, 1999-2000, No 7061, p 144 (August 31, 2000).
[86] *Kitchen v Ferndale City Council*, 253 Mich App 115; 654 NW2d 918 (2002).
[87] MCL 15.267(2).

Inadvertent omissions from the minutes – the OMA does not invalidate a decision due to a simple error in the minutes, such as inadvertently omitting the vote to go into closed session from a meeting's minutes.[88]

[88] *Willis v Deerfield Twp*, 257 Mich App 541, 554; 669 NW2d 279 (2003).

PARLIAMENTARY PROCEDURES

Core principle – for the actions of a public body to be valid, they must be approved by a majority vote of a quorum, absent a controlling provision to the contrary, at a lawfully convened meeting.[89]

QUORUM

Quorum – is the minimum number of members who must be present for a board to act. Any substantive action taken in the absence of a quorum is invalid. If a public body properly notices the meeting under OMA, but lacks a quorum when it actually convenes, the board members in attendance may receive reports and comments from the public or staff, ask questions, and comment on matters of interest.[90]

What is the quorum? – look to the statute, charter provision, or ordinance creating the board. On the state level, the Legislature in recent years has taken care to set the board quorum in the statute itself. The statute will often provide that "a majority of the board appointed and serving shall constitute a quorum." For a 15-member board, that means eight would be the quorum, assuming you have 15 members appointed and serving. Without more in the statute, as few as five board members could then decide an issue, since they would be a majority of a quorum.[91] But, be careful, recent statutes often provide that "voting upon action taken by the board shall be conducted by majority vote of the members appointed and serving." In that instance, the board needs at least eight favorable votes to act.[92] The Legislature has a backstop statute, which provides that any provision that gives "joint authority to 3 or more public officers or other persons shall be construed as giving such authority to a majority of such officers or other persons, unless it shall be otherwise expressly declared in the law giving the authority."[93]

Disqualified members – a member of a public body who is disqualified due to a conflict of interest may not be counted to establish a quorum to consider that matter.[94]

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[89] OAG, 1979-1980, No 5808, p 1060 (October 30, 1980). Robert's Rules of Order Newly Revised (RRONR) (10th ed.), p 4. We cite to Robert's Rules in this Handbook as a leading guide on parliamentary procedures. This is not to imply that public bodies are, as a general rule, bound by Robert's Rules.
[90] OAG, 2009-2010, No 7235, p __ (October 9, 2009).
[91] See OAG, 1977-1978, No 5238, p 261 (November 2, 1977).
[92] See OAG, 1979-1980, No 5808, at p 1061.
[93] MCL 8.3c. *Wood v Bd of Trustees of the Policemen and Firemen Retirement System of Detroit*, 108 Mich App 38, 43; 310 NW2d 39 (1981).
[94] OAG, 1981-1982, No 5916, p 218 (June 8, 1981). But see MCL 15.342a, which provides a procedure for disqualified public officials to vote in some limited circumstances where a quorum is otherwise lacking for a public body to conduct business.

Losing a quorum – even if a meeting begins with a quorum present, the board loses its right to conduct substantive action whenever the attendance of its members falls below the necessary quorum.[95]

Resigned members – the common law rule in Michigan is that a public officer's resignation is not effective until it has been accepted by the appointing authority (who, at the state level, is usually the governor). Acceptance of the resignation may be manifested by formal acceptance or by the appointment of a successor.[96] Thus, until a resignation is formally accepted or a successor appointed, the resigning member must be considered "appointed and serving," be counted for quorum purposes, and be permitted to vote.

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[95] RRONR (10th ed.), p 337-338.
[96] OAG, 1985-1986, No 6405, p 429, 430 (December 9, 1986), citing *Clark v Detroit Bd of Education*, 112 Mich 656; 71 NW 177 (1897).

VOTING

Abstain – means to refuse to vote. Thus, a board member does not "vote" to abstain. If a vote requires a majority or a certain percentage of the members present for approval, an abstention has the same effect as a "no" vote.[97]

Adjourning the meeting - a presiding officer cannot arbitrarily adjourn a meeting without first calling for a vote of the members present.[98]

Chairperson voting – perhaps as a spillover from the well-known constitutional rule that the vice president can only vote to break a tie in the United States Senate[99] or that a legislative presiding officer usually refrains from voting unless his or her vote affects the result,[100] some believe that a board's presiding officer (usually, the chairperson) can only vote to break a tie. However, absent a contrary controlling provision, all board members may vote on any matter coming before a board.[101] A board's presiding officer can't vote on a motion and then, if the vote is tied, vote to break the tie unless explicitly authorized by law.[102]

Expired-term members – look first to the statute, charter provision, or ordinance creating the public body. Many statutes provide that "a member shall serve until a successor is appointed." Absent a contrary controlling provision, the general rule is that a public officer holding over after his or her term expires may continue to act until a successor is appointed and qualified.[103]

Imposing a greater voting requirement – where the Legislature has required only a majority vote to act, public bodies can't impose a greater voting requirement, such as requiring a two-thirds vote of its members to alter certain policies or bylaws.[104]

Majority – means simply "more than half."[105] Thus, on a 15-member board, eight members constitute a majority.

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[97] RRONR (10th ed.), p 390-395.
[98] *Dingwall v Detroit Common Council*, 82 Mich 568, 571; 46 NW 938 (1890),
[99] US Const, art I, §3.
[100] RRONR (10th ed.), p 392-393 – an assembly's presiding officer can break or create a tie vote.
[101] See OAG, 1981-1982, No 6054, p 617 (April 14, 1982).
[102] *Price v Oakfield Twp Bd*, 182 Mich 216; 148 NW 438 (1914).
[103] OAG, 1979-1980, No 5606, p 493 (December 13, 1979), citing *Greyhound Corp v Public Service Comm*, 360 Mich 578, 589-590; 104 NW2d 395 (1960). See also, *Cantwell v City of Southfield*, 95 Mich App 375; 290 NW2d 151 (1980).
[104] OAG, 1979-1980, No 5738, p 870 (July 14, 1980). OAG, 2001-2002, No 7081, p 27 (April 17, 2001), citing *Wagner v Ypsilanti Village Clerk*, 302 Mich 636; 5 NW2d 513 (1942).
[105] RRONR (10th ed.), p 387.

Proxy voting – the OMA requires that the deliberation and formulation of decisions effectuating public policy be conducted at open meetings.[106] Voting by proxy effectively forecloses any involvement by the absent board member in the board's public discussion and deliberations before the board votes on a matter effectuating public policy.[107] Without explicit statutory authority, this practice is not allowed.[108]

Roll call vote – there is no bright line rule for conducting a roll call vote.[109] We suggest some rules of thumb. One, when a voice vote reveals a divided vote on the board (i.e., more than one no vote), a roll call vote should be conducted to remove doubt about the vote's count. Two, if you have board members participating by teleconference, a roll call will permit the secretary to accurately record the entire vote. Three, when the board is acting on matters of significance, such as, contracts of substantial size or decisions that will have multi-year impacts, a roll call vote is the best choice.

Round-robin voting – means approval for an action outside of a public meeting by passing around a sign-off sheet. This practice has its roots in the legislative committee practice of passing around a tally sheet to gain approval for discharging a bill without a committee meeting. "Round-robining" defeats the public's right to be present and observe the manner in which the body's decisions are made and violates the letter and the spirit of the OMA.[110]

Rule of necessity – if a state agency's involvement in prior administrative or judicial proceedings involving a party could require recusal of all of its board members or enough of them to prevent a quorum from assembling, the common law rule of necessity precludes recusing all members, if the disqualification would leave the agency unable to adjudicate a question.[111] But the rule of necessity may not be applied to allow members of a public body to vote on matters that could benefit their private employer.[112]

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[106] *Esperance v Chesterfield Twp*, 89 Mich App at 464, quoting *Wexford County Prosecutor v Pranger*, 83 Mich App 197; 268 NW2d 344 (1978).

[107] Robert's Rules concur: "Ordinarily it [proxy voting] should neither be allowed nor required, because proxy voting is incompatible with the essential characteristics of a deliberative assembly in which membership is individual, personal, and nontransferable." RRONR (10th ed.), p 414. The Michigan House and Senate do not allow proxy voting for their members.

[108] OAG, 2009-2010, No 7227, p __ (March 19, 2009). OAG, 1993-1994, No 6828, p 212 (December 22, 1994), citing *Dingwall*, 82 Mich at 571, where the city council counted and recorded the vote of absent members in appointing election inspectors. The Michigan Supreme Court rejected these appointments, ruling that "the counting of absent members and recording them as voting in the affirmative on all questions, was also an inexcusable outrage."

[109] "The fact that the Open Meetings Act prohibits secret balloting does not mean that all votes must be roll call votes." *Esperance v Chesterfield Twp*, 89 Mich App at 464 n 9. The OMA does provide that votes to go into closed session must be by roll call. MCL 15.267.

[110] OAG, 1977-1978, No 5222, at p 218. See also, *Booth Newspapers,* 444 Mich at 229, which concluded that "round-the-horn" deliberations can constitute decisions under the OMA.

[111] *Champion's Auto Ferry, Inc v Michigan Public Service Comm*, 231 Mich App 699; 588 NW2d 153 (1998). The Court noted that the PSC members did not have any personal financial interest in the matter. *Id.* at 708-709.

[112] OAG, 1981-1982, No 6005, p 439, 446 (November 2, 1981). After OAG No 6005 was issued, the Legislature amended section 2a of 1973 PA 196, MCL 15.342a, to provide a procedure for voting by public officials in some limited circumstances where a quorum is otherwise lacking for a public entity to conduct business.

Secret ballot – the OMA requires that all decisions and deliberations of a public body must be made at an open meeting and the term "decision" is defined to include voting.[113] The OMA prohibits a "voting procedure at a public meeting that prevents citizens from knowing how members of a public body have voted."[114] Obviously, the use of a secret ballot process would prevent this transparency. All board decisions subject to the OMA must be made by a public vote at an open meeting.[115]

Tie vote – a tie vote on a motion means that the motion did not gain a majority. Thus, the motion fails.[116]

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[113] See MCL 15.262(d) and 15.263(2) and (3).
[114] OAG, 1977-1978, No 5262, at p 338-339.
[115] *Esperance*, 89 Mich App at 464.
[116] *Rouse v Rogers*, 267 Mich 338; 255 NW 203 (1934). RRONR (10th ed.), p 392.

CHARTER TOWNSHIP OF PLYMOUTH
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SPECIAL MEETING
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ITEM 6

OLD BUSINESS

CHARTER TOWNSHIP OF PLYMOUTH
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ITEM 7
PUBLIC COMMENTS AND QUESTIONS

CHARTER TOWNSHIP OF PLYMOUTH
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ITEM 8
ADJOURNMENT