Filed: 8/26/2026 7:14 AM
Carin Carroll
District Clerk
Titus County, Texas
Debbie Swindler

**CAUSE NO. 44437**

| | | |
|---|---|---|
| KYLE DOUGLAS MORING, | § | IN THE DISTRICT COURT OF |
| Petitioner, | § | |
| | § | |
| v. | § | TITUS COUNTY, TEXAS |
| | § | |
| CITY OF MOUNT PLEASANT, TEXAS, | § | |
| Respondent. | § | 76th JUDICIAL DISTRICT |

# PETITIONER'S FOURTH SUPPLEMENT TO PRETRIAL WITNESS AND EXHIBIT LISTS

*Provided under Texas Rules of Civil Procedure 193.5 and 194.4 out of caution*

Petitioner Kyle Douglas Moring, appearing pro se, further supplements his previously filed Pretrial Witness and Exhibit Lists and supplements. This filing identifies proposed Exhibits W, X, and Y, adds no witness or substantive relief, and withdraws nothing.

## I. ADDITIONAL PROPOSED EXHIBITS

Petitioner identifies proposed Exhibits W, X, and Y, which he may offer for the limited purposes below, subject to foundation, objection, completeness, and the Court's evidentiary rulings.

| Exhibit | Item and limited purpose |
|---|---|
| **W** | May 20 and May 29 administrative-review transmissions, including Webster's May 20 EML supplied in Bailey's July 22 native-format production (9 pages). Limited to notice, chronology, provenance, City-authored status information, and the premise and weight of the determinations. Not offered for the truth of an allegation or for relief against either reviewing office. |
| **X** | Electronic export, PDF generation, and production routes (24 pages). Limited to request-specific capability, documented HSCloud and HS Touch routes, Mount Pleasant outputs, and the requested-medium issue. Not offered to prove universal exportability, identical configurations, or intent. |

| Exhibit | Item and limited purpose |
|---|---|
| **Y** | August 25 focused-conferral response and compact source controls, including an April 1/April 4 OneDrive folder-state control and a sanitized six-capture link-status control (33 pages). Limited to relevance, chronology, notice, conferral posture, Respondent's factual search and production descriptions and counts, facial differences, observed link status on specified dates, and reconciliation. The complete letter is included for context; the link pages do not prove deletion, cause, intent, counsel knowledge, or original-date accessibility. |

W, X, and Y address administrative-review transmissions, electronic production routes, and Respondent's August 25 response. They bear on the pleaded completeness, search, requested-medium, and mootness disputes. Y reproduces the complete letter, adds narrow Exhibit I folder-state and sanitized link-status controls, and cross-references proposed Exhibit V; the August 11 requests and protocols remain separately submitted.

## II. RELATIONSHIP TO EARLIER-FILED MATERIAL; DUPLICATION CONTROL

Exhibits W, X, and Y bridge, rather than reproduce, the existing record. The underlying source documents control over the cross-references below.

| Earlier-filed or disclosed material | Treatment in Exhibits W, X, and Y |
|---|---|
| Filed K-0 (Volume 2, pp. 36-42) and file-stamped R-2 through R-6 | May 22 OAG determination and footnote 8, and five July 2 OAG-produced City certifications; incorporated, not reprinted. Y-009 notes the City's June 2 five-file ZIP had no certification form. |
| Proposed U-012 through U-014, V, and H-1 | Bailey determination, later productions, and native/record-family controls; incorporated, not reprinted. Proposed V-003 through V-004 supplies the sanitized EPA-TCEQ-MPPD/City known-record and embedded-content control referenced in Y. |
| Filed Volumes 1-3 (pinpoints at X-001 and Y-002) | E/F requests; City search, print/scan, and export statements; February 9 routing; February 25/27 certifications; March 10 Purview response; March 17 transcript; and permit spreadsheet. Incorporated, not reprinted. |
| August 11 focused-conferral submission and proposed C/E/F/G/I protocols | Not reproduced. Y contains Respondent's later response and compact controls; the requests and protocols remain separately submitted. |
| City-produced January 12 assignment; February 27 search images; May 12 transmittal; June 2 call PNGs and AUSA response; April 1/April 4 OneDrive views; representative SharePoint link-status captures | New source controls are reproduced once at Y-006 through Y-010 and Y-025 through Y-033; embedded requests and later-obtained certifications are not repeated. Y-010 is limited to notice and the apparent federal-law-enforcement nexus; Y-025 is the folder-state control; Y-026 through Y-033 are the sanitized link-status control. Respondent's complete attachment remains at Y-011 through Y-024. |

**Footnote-8 precision.** The OAG states that it accepts the governmental body's public-information officer's statements unless evidence clearly indicates a contrary conclusion. Bailey's letter has no separate footnote 8; it adopts the OAG's May 22 findings. W shows the transmission record bearing on their premise and weight.

Richardson told Bailey the City compiled the updated request-status spreadsheet and forwarded Webster's answers; Webster transmitted the document supplied to OAG; Bailey acknowledged the updates. W alone establishes neither falsity nor omission.

**Exhibit-X precision.** Exhibit X does not assert that every documented feature was enabled for Mount Pleasant, that comparator systems were identically configured, or that every record followed one route. It separates Mount Pleasant outputs from product-capability corroboration.

**Exhibit-Y precision.** Respondent's complete attachment is reproduced once. Authenticated operational representations may be offered under TRE 801(e)(2) and tested against independent controls; legal conclusions are disputed advocacy. If TRE 408 applies, the response is used only for notice, chronology, current position, and reconciliation—not to prove liability through compromise. The independent link pages show observed status only, not deletion, cause, intent, bad faith, or counsel knowledge. Embedded assertions remain subject to TRE 805, and the complete attachment preserves context under TRE 106/107.

## III. TIMING, SOURCE HANDLING, AND FOUNDATION

W concerns the May 29 and July 22 productions. X includes Fort Worth's August 24 response, City and Titus CAD records, and limited archived product documentation. Y contains Respondent's August 25 response and compact source controls. W, X, and Y are nine, twenty-four, and thirty-three pages.

To the extent the Court's August 10 direction modified the default Rule 194.4 timetable, Petitioner disclosed the identified items promptly. The August 25 link rechecks did not exist until after Respondent's response, and the earlier captures gained rebuttal significance from its current-availability statement. Respondent authored the response, and the City transmitted the tested links. To the extent Rule 193.6 applies, Petitioner requests an express, record-supported finding of good cause or lack of unfair surprise or prejudice under Rule 193.6(a)-(b).

W reproduces representative May 29 forwarded records and links Webster's underlying May 20 EML from Bailey's July 22 native-format production through shared identifiers listed at W-003.

Exhibit X identifies each source and separates Mount Pleasant records from capability materials. Fort Worth's response came through its official portal; City/Titus CAD wrappers and archived URLs identify the sources. Complete files remain available.

**Exhibit-Y source handling.** Y-006 through Y-010 are the March 10, February 27, May 12, June 2, and AUSA controls described in the exhibit; Y-011 through Y-024 reproduce Respondent's complete August 25 attachment; Y-025 is the April 1/April 4 folder-state control; and Y-026 through Y-033 are the two-page link-status control and six representative source captures. The six captures are rasterized, proportionally cropped, and flattened. Share URLs, access parameters, browser headers and footers, active URI annotations, and source metadata are omitted from the public exhibit; the displayed message, correlation ID, and page-displayed date/time remain visible. Complete unmodified sources, transmittals, metadata, and hashes are retained.

Petitioner will first seek stipulation and may otherwise testify that he received Y-011 through Y-024 as Beck's exact August 25 attachment and that he clicked the exact City-transmitted links, observed the Y-028 through Y-033 pages, and contemporaneously saved or printed them. The transmittals, unmodified PDFs and captures, metadata, and hashes are preserved. Additional foundation may include production correspondence, native wrappers, distinctive characteristics, correlation IDs, a custodian, and other proof the Court permits. Complete sources can be supplied securely to Respondent or tendered in camera.

## IV. PRIOR DESIGNATIONS AND REQUEST

All prior designations remain unchanged. This supplement, the focused presentation, and omission of complete Volumes 1-3 from the new condensed paper packet are courtroom-management measures only; they do not waive, release,

settle, amend, nonsuit, withdraw, or abandon any pleaded count, exhibit, remedy, objection, or appellate issue. Petitioner requests that the Court accept this supplement and, if necessary, make the Rule 193.6(a)-(b) findings. Admissibility remains for determination when an exhibit is offered, and every claim not expressly adjudicated remains pending.

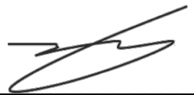
Respectfully submitted,



**Kyle Douglas Moring**
Petitioner, Pro Se
[redacted]

**CERTIFICATE OF SERVICE**

I certify that on August 26, 2026, a true and correct copy of this Fourth Supplement to Pretrial Witness and Exhibit Lists, together with proposed Exhibits W, X, and Y, was served electronically through the electronic filing manager on all counsel and service contacts of record for Respondent City of Mount Pleasant, Texas, in accordance with Texas Rules of Civil Procedure 21 and 21a.



_____

**Kyle Douglas Moring**
Petitioner, Pro Se
[redacted]

**CAUSE NO. 44437**

| | | |
|---|---|---|
| KYLE DOUGLAS MORING,<br>Petitioner, | §<br>§<br>§ | IN THE DISTRICT COURT OF |
| v. | §<br>§ | TITUS COUNTY, TEXAS |
| CITY OF MOUNT PLEASANT, TEXAS,<br>Respondent. | §<br>§ | 76th JUDICIAL DISTRICT |

# PETITIONER'S PROPOSED EXHIBIT W
# CITY / OAG / TITUS COUNTY DA TRANSMISSION AND ADMINISTRATIVE-RELIANCE RECORD

## Limited purpose

This nine-page exhibit is a compact transmission and provenance record drawn from the Titus County District Attorney's May 29, 2026 forwarded-message production, with the underlying Webster EML later supplied in Bailey's July 22 native-format production. It is offered only to show notice and chronology; what City-authored status information was transmitted to the two reviewing offices; Bailey's receipt and acknowledgment; and the premise and explanatory weight of the resulting determinations. It is not offered to prove the truth of an underlying allegation, anyone's intent, or a claim against a nonparty.

## Relationship to earlier exhibits

| Earlier material | Not repeated here |
|---|---|
| K-0 / Filed Volume 2, pp. 36-42 | May 22 OAG final determination and footnote 8. |
| File-stamped Exhibit R, R-2 to R-6 | Five Webster/OAG completeness certifications. |
| Proposed Exhibit U, U-012 to U-014 | Bailey determination, case-file notice, and scope clarification. |
| Proposed Exhibit V / H-1 | Later production, native-container, and record-family controls. |

## Determination-chain reference

**OAG footnote 8.** The OAG would accept statements from the governmental body's public information officer as true unless evidence clearly indicated a contrary conclusion. Bailey's letter does not contain its own footnote 8; it adopts the OAG's findings. W supplies the new transmission link without reprinting either determination.

Filing or serving this compilation does not itself admit any page into evidence. Each source page remains subject to authentication, objection, completeness, and an express evidentiary ruling.

## SOURCE INDEX AND LIMITED-USE MAP

| Page | Included source and limited relevance |
|---|---|
| W-004 | Richardson notice that the City compiled the request-status spreadsheet and Webster would share it with Bailey. |
| W-005 | Webster's direct transmittal to Bailey at Richardson's request. |
| W-006 | Webster's statement that all documentation was provided and the spreadsheet was updated. |
| W-007 | Richardson's transmission of the answers from Webster, including the native-format answer. |
| W-008 | Request-specific completeness, date-range, missing-record, and search answers attributed to Webster. |
| W-009 | Bailey's acknowledgment and the transmitted City-attorney answer concerning request item 20. |

### Short chronology

**May 20, 9:55 a.m. -** Richardson tells Bailey that the City compiled the updated spreadsheet and that Webster was asked to share it.

**May 20, 9:59 a.m. -** Richardson forwards follow-up questions and 'the answers from Ms. Webster.'

**May 20, 10:04 a.m. -** Bailey replies, 'Thank you for these updates.'

**May 20, 1:05 p.m. -** Webster sends Bailey and Beck 'the document that we provided to the OAG.'

**May 22 / May 29 -** The OAG issues its final determination; Bailey later adopts its findings.

### Excerpt convention

Only the source pages necessary to establish the transmission chain and representative answers are reproduced. Every omission is disclosed by the source filename and page selection. The complete May 29 production, the May 29 forwarding-wrapper EML, Richardson's July 21 metadata instruction, and Bailey's July 22 native-format production are retained.

## NATIVE PROVENANCE AND INTEGRITY CONTROLS

The EML controls include Bailey-to-Petitioner forwarding messages from the May 29 production and Webster's underlying May 20 email supplied in Bailey's July 22 native-format production. The table identifies the three May 29 wrappers corresponding to W-004 and W-007 through W-009. Long values are broken only for readability.

| Control | Native wrapper identifier |
|---|---|
| W-004 control | File: Thread 1/Fwd_ Re_ PIA Complaint - City of Mt. Pleasant - Kyle Moring 2.eml<br>Wrapper Message-ID: <11a56bf3bf406c7b3f43bf64 445 770d2<br>@co.titus.tx.us><br>SHA-256: c539fa1f91ed68a2dee2beb26c16cf0f<br>34b290ebbd69a21 340 159 142e992f21f |
| W-007/W-008 control | File: Thread 4/Fwd_ FW_ PIA Complaint - Kyle Moring 2.eml<br>Wrapper Message-ID: <346 716 554 030d4d4ed75 565d9945dff1<br>@co.titus.tx.us><br>SHA-256: a8d0794ce495ad3ebe1683eba40f9641<br>11a183c87cbd3a2603d930e5d8fe3988 |
| W-009 control | File: Thread 4/Fwd_ Re_ FW_ PIA Complaint - Kyle Moring.eml<br>Wrapper Message-ID: <04a9798a5b1d7c11 246ca391e00ca95f<br>@co.titus.tx.us><br>SHA-256: b60f383aaff6fa81c9a084 948cf6a260<br>bc93fffd96d8fe88af952c60a0ee16c5 |

### Additional native controls for W-005 and W-006

May 29 wrapper: Fwd_ FW_ PIA Complaint - Kyle Moring.eml; Message-ID <7bb302 933f78b601b92 753a51b6afc7e@co.titus.tx.us>; In-Reply-To <DS0PR16MB69 020B974CF2186F9D3CB659AC012@DS0PR16MB6902.namprd16.prod.outlook.com>; SHA-256 b4d62c4da2e324 983 911a8beded3e7810bdef57e9a46a85cd4d1d29a9bc6c9b0. July 22 underlying EML: 2026-05-20 - City of Mt Pleasant - FW - PIA Complaint - Kyle Moring.eml; Message-ID <DS0PR16MB69 020B974CF2186F9D3CB659AC012@DS0PR16MB6902.namprd16.prod.outlook.com>; SHA-256 9b2acbe85c0ea58cbdf1e4b4bc43 024 570fd28 136e00 274ad18aa953db74 695c. The shared Message-ID links Bailey's wrapper to Webster's direct May 20 email and its attached spreadsheet. W-005 and W-006 are the readable PDF rendering, not the native control.

### Production chronology and authentication limit

Richardson's July 21 native EML asked Bailey to save the responsive emails and send them as attachments because Petitioner sought the attendant metadata; Bailey's native-format production followed on July 22. The native headers corroborate sender, recipients, UTC time, Message-ID, references, and attachment. They do not establish the truth of the City-authored status statements, which remains a separate issue.

**From:** cbailey@co.titus.tx.us
**Subject:** Fwd: Re: PIA Complaint - City of Mt. Pleasant - Kyle Moring
**Date:** May 29, 2026 at 12:09 PM
**To:** Kyle Moring [redacted]

C

-------- Forwarded message -------
From: "Kent Richardson" <Kent.Richardson@oag.texas.gov>
To: cbailey@co.titus.tx.us
Sent: May 20, 2026 9:55 AM
Subject: RE: PIA Complaint - City of Mt. Pleasant - Kyle Moring

Mr. Bailey,

I have been working with the city to get status information on all of the requests that form the basis for Mr. Moring's complaint and the city compiled a spreadsheet that lists the requests and their updated information. I have asked the city secretary Candias Webster cwebster@mtpleasanttx.gov to share the information with you as well. I also have some email correspondence that clarifies some of their information as well which I will forward to you.

Let me know if you don't receive the shared information or if you have any questions.

Thank you.

**Kent Richardson**

*Deputy Division Chief*

*Criminal Prosecutions Division*
Office of the Attorney General

P.O. Box 12548

Austin, Texas 78711-2548

(512) 922-6124

(512) 397-1642 Fax

kent.richardson@oag.texas.gov

**From:** cbailey@co.titus.tx.us <cbailey@co.titus.tx.us>
**Sent:** Wednesday, March 18, 2026 11:12 AM
**To:** Kent Richardson <Kent.Richardson@oag.texas.gov>
**Subject:** Re: PIA Complaint - City of Mt. Pleasant - Kyle Moring

Thank you, Mr. Richardson.

March 18, 2026 11:03 AM, "Kent Richardson" <Kent.Richardson@oag.texas.gov> wrote:

> Mr. Bailey,
>
> I will contact the city once I get the complaint reviewed and try to get the status of the requests. I can copy you on what I find. If you get any information through your review, just let me know if you can.
>
> Thank you.
>
> Kent Richardson

**From:** cbailey@co.titus.tx.us
**Subject:** Fwd: FW: PIA Complaint - Kyle Moring
**Date:** May 29, 2026 at 1:13 PM
**To:** Kyle Moring [redacted]

C

-------- Forwarded message -------
From: "Candias Webster" <cwebster@mtpleasanttx.gov>
To: cbailey@co.titus.tx.us, "Austin Beck" <abeck@dtrglaw.com>
Sent: May 20, 2026 1:05 PM
Subject: FW: PIA Complaint - Kyle Moring

Mr. Bailey,

I have attached the document that we provided to the OAG.

**Thank you,**

**Candias Webster, TRMC, CMC**

**Assistant City Manager/ City Secretary**

**City of Mt. Pleasant**

**Office: 903-575-4000**

**Cell:** [redacted]

**Fax: 903-577-1828**

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**From:** Kent Richardson <Kent.Richardson@oag.texas.gov>
**Sent:** Wednesday, May 20, 2026 9:33 AM
**To:** Candias Webster <cwebster@mtpleasanttx.gov>; Austin Beck <abeck@dtrglaw.com>
**Subject:** RE: PIA Complaint - Kyle Moring

Candias,

Can you share the updated information on this to DA Charles Bailey as well. He also has the same complaint made to his office and needed the information to resolve it as well. cbailey@co.titus.tx.us

Thank you.

**Kent Richardson**

*Deputy Division Chief*

*Criminal Prosecutions Division*

Office of the Attorney General

P.O. Box 12548

Austin, Texas 78711-2548

(512) 922-6124

(512) 397-1642 Fax

kent.richardson@oag.texas.gov

**From:** Candias Webster <cwebster@mtpleasanttx.gov>
**Sent:** Tuesday, May 5, 2026 8:36 AM
**To:** Kent Richardson <Kent.Richardson@oag.texas.gov>; Austin Beck <abeck@dtrglaw.com>
**Subject:** RE: PIA Complaint - Kyle Moring

Kent,

I have provided all the documentation and updated the spreadsheet for all the requests in the link below. There is one that is a different color that Austin will have to respond to.

OAG Complaint

**Thank you,**

**Candias Webster, TRMC, CMC**

**Assistant City Manager/ City Secretary**

**City of Mt. Pleasant**

**Office: 903-575-4000**

**Cell:** [redacted]

**Fax: 903-577-1828**

*This document/description/text may have been generated by Microsoft Copilot and edited by me*

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**From:** Kent Richardson <Kent.Richardson@oag.texas.gov>

**From:** cbailey@co.titus.tx.us
**Subject:** Fwd: FW: PIA Complaint - Kyle Moring
**Date:** May 29, 2026 at 12:08 PM
**To:** Kyle Moring [redacted]

C

-------- Forwarded message -------
From: "Kent Richardson" <Kent.Richardson@oag.texas.gov>
To: cbailey@co.titus.tx.us
Sent: May 20, 2026 9:59 AM
Subject: FW: PIA Complaint - Kyle Moring

Mr. Bailey,

Below are follow-up questions I had about line items from the spreadsheet and the answers from Ms. Webster.

Let me know if you have any questions.

---

**From:** Candias Webster <cwebster@mtpleasanttx.gov>
**Sent:** Friday, May 8, 2026 11:19 AM
**To:** Kent Richardson <Kent.Richardson@oag.texas.gov>; Austin Beck <abeck@dtrglaw.com>
**Subject:** Re: PIA Complaint - Kyle Moring

Kent,

He received every email message in its native format. The screenshot is the only thing he didn't get

**Thank you,**

**Candias Webster, TRMC, CMC**

**Assistant City Manager/ City Secretary**

**City of Mt. Pleasant**

**Office: 903-575-4154**

**Cell:** [redacted]

**Fax: 903-577-1828**

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---

**From:** Kent Richardson <Kent.Richardson@oag.texas.gov>
**Sent:** Friday, May 8, 2026 11:12:01 AM
**To:** Candias Webster <cwebster@mtpleasanttx.gov>; Austin Beck <abeck@dtrglaw.com>
**Subject:** RE: PIA Complaint - Kyle Moring

Candias,

**From:** Kent Richardson <Kent.Richardson@oag.texas.gov>
**Sent:** Thursday, May 7, 2026 4:32 PM
**To:** Candias Webster <cwebster@mtpleasanttx.gov>; Austin Beck <abeck@dtrglaw.com>
**Subject:** RE: PIA Complaint - Kyle Moring

Candias,

I have reviewed the spreadsheet responses, and I have a few follow-up questions. I will reference them based on the line number in the sheet.

2. You indicate that the records produced for this request have been submitted to the OAG. Does that mean a request for ruling was made for this request or does this mean all of the responsive documents have been released to him? No, he filed a complaint and I responded to the complaint. I attached the documentation in the file folder.

7. Mr. Moring noted that your previous response noted emails would be sent to the OAG for ruling. Is this correct or is he confusing requests? Were the emails not able to be produced in native format? All the information I had at the time was sent to Mr. Moring

8. Mr. Moring noted a specific complaint FS-473844. Can you confirm that the city doesn't have those records? I think you say this by saying that DSHS has records you don't have. We do not have record of that complaint

10. For this one, did the city transcribe the call log data instead of producing the actual records? I think the actual records need to be produced and redactions may be possible without a ruling if a qualifying exception applies. Otherwise, a ruling would need to be requested unless a prior ruling would apply in this situation. This was his personal cell phone and no he did not get screenshots. He was wanted metadata from his phone.

11. Mr. Moring notes that the wrong date range was applied to the produced records. Can you confirm that the range he requested was used? His date range was October 14, 2025 through October 23, 2025 (Central Time) and we gave him October 13 through November3

12. Cam you confirm that the other categories of information had no responsive records? The new 552.221(f) provision may require specific response of "no responsive records" for each item or category of records. That was all the information we have related to the request and no I didn't respond to each item that we had "no responsive records". I told him this is all the information we have related to this request.

17. The plans in question were not released? Was a ruling requested for the sensitive documents? If not, I believe one would need to be requested to withhold. Please see attached email

18. Mr. Moring notes that additional documents were found in this later duplicate request. If this is true, can you confirm that the second production is complete? He has received every piece of documentation we have related to Wal-Mart. In his second request he asked about "Spark" which is why he was given more information than what he originally requested.

22. Mr. Moring notes that a ruling was requested. You note that all responsive information was provided to him. Is he confusing requests or does this mean you provided all information that could be released pending a ruling on the remainder? All information we had after searching the email system was provided to him. He thinks because it says "email signature" means that an email actually exist.

23. Mr. Moring complains that the search being used is too broad and is generating more results than necessary. Can you clarify this aspect? He is the one that provided me with the search key words. I searched what he asked for. Below is what he asked for to be searched.

This request includes, but is not limited to, communications with the following agencies:

**Federal agencies (including applicable regional offices):**

**From:** cbailey@co.titus.tx.us
**Subject:** Fwd: Re: FW: PIA Complaint - Kyle Moring
**Date:** May 29, 2026 at 12:12 PM
**To:** Kyle Moring [redacted]

C

-------- Forwarded message -------
From: cbailey@co.titus.tx.us
To: "Kent Richardson" <Kent.Richardson@oag.texas.gov>
Sent: May 20, 2026 10:04 AM
Subject: Re: FW: PIA Complaint - Kyle Moring
Mr. Richardson,

Thank you for these updates.

Chuck Bailey

May 20, 2026 10:00 AM, "Kent Richardson" <Kent.Richardson@oag.texas.gov> wrote:

Mr. Bailey,

Here is city attorney Austin Beck's answer to the question about line item #20 from the spreadsheet.

Let me know if you have questions.

Thank you.

**Kent Richardson**

*Deputy Division Chief*

*Criminal Prosecutions Division*
Office of the Attorney General

P.O. Box 12548

Austin, Texas 78711-2548

(512) 922-6124

(512) 397-1642 Fax

kent.richardson@oag.texas.gov

**From:** Austin Beck <abeck@dtrglaw.com>
**Sent:** Wednesday, May 13, 2026 3:39 PM
**To:** Kent Richardson <Kent.Richardson@oag.texas.gov>; Candias Webster <cwebster@mtpleasanttx.gov>
**Subject:** RE: PIA Complaint - Kyle Moring

Mr. Richardson,

The request #20 resulted in over 3000 pages of responsive information, the vast majority of which consists of emails from Mr. Moring to various city officials, including the city attorney email addresses. Maybe 1% of the responsive information consists of attorney-client privileged communications, which I've completed identifying and separating to seek an OAG ruling to withhold. That ruling request will be submitted this evening and the remaining responsive information will be made available to Mr. Moring.

**CAUSE NO. 44437**

| | | |
|---|---|---|
| KYLE DOUGLAS MORING, | § | IN THE DISTRICT COURT OF |
| Petitioner, | § | |
| | § | |
| v. | § | TITUS COUNTY, TEXAS |
| | § | |
| CITY OF MOUNT PLEASANT, TEXAS, | § | |
| Respondent. | § | 76th JUDICIAL DISTRICT |

# PETITIONER'S PROPOSED EXHIBIT X

## ELECTRONIC EXPORT, PDF GENERATION, AND PRODUCTION ROUTES

### Limited purpose

This exhibit is a compact technology-and-production-route record. It is offered to show that the categorical proposition that City electronic records must be printed to paper and scanned before electronic production requires request-specific proof. The source pages identify multiple electronic routes—Excel/CSV export, browser download, HS Touch upload and email, printform download or email, and PDF generation—and Mount Pleasant records demonstrating actual use of HSCloud and HS Touch. The exhibit is not offered to prove that every responsive record is exportable through the same route, that Fort Worth and Mount Pleasant had identical configurations, or that any person acted with improper intent.

### Earlier-filed record incorporated by reference; not reprinted

| Earlier-filed location | Proposition shown by that page |
|---|---|
| Filed Exhibit Volume 2 (J–L), PDF p. 324 | Beck stated on September 11, 2025 that the City's software did not allow electronic records to be exported and that records had to be printed and scanned to PDF. |
| Filed Exhibit Volume 2 (J–L), PDF p. 327 | Webster offered an Excel spreadsheet for each location and attached a sample while stating the system could not perform mass downloads of all documents. |
| Filed Exhibit Volume 3 (M–Q), PDF p. 287 | Webster stated on September 18, 2025 that the system did not allow downloading as requested and the City therefore had to print and scan. |
| Filed Exhibit Volume 3 (M–Q), PDF p. 523 | The City-produced file named "export-Building Permit Manager-2025-09-02.xlsx" is shown as a Building Permit Manager export, although the filed example contains only a header row. |
| Filed Exhibit Volume 2 (J-L), PDF pp. 262-264 | The City stated that Microsoft Purview conducts its TPIA searches, responsive email is exported natively in .pst or .msg format, and Bryan IT executes complex mailbox searches at the City's direction. This is an email-system control, not proof of a particular HSCloud configuration. |

*The City's inspection and HSCloud records already contained in the filed exhibit volumes, and the separately tendered Proposed Exhibits U, V, and W, are not duplicated here.*

*Filing or serving this compilation does not itself admit any page into evidence. Each source remains subject to authentication, completeness, objection, and an express evidentiary ruling.*

## CAPABILITY CROSSWALK

| Route | What the attached source actually shows | Careful inference |
|---|---|---|
| **Excel / CSV export** | Fort Worth's official production includes HS GovTech support instructions to set "Allow Export" to "Yes," followed by actions for checked-record Excel/CSV exports and an entire-record-set Excel export. The archived guide describes the same routes. | The HSCloud family includes configurable data-export functions. Whether a particular Mount Pleasant tool had the function enabled is a factual question. |
| **Download / printform** | Fort Worth's permit manual states that a permit printform can be downloaded as a file or printed directly. Archived HealthSpace documentation states that printforms can be downloaded, emailed, or printed. | Paper is not the only documented output route for a generated printform. |
| **PDF generation / history** | Archived Form Builder documentation describes a history entry for actions such as "emailed" and "printed as PDF." | The product documentation expressly contemplates a PDF route and a related audit entry. |
| **HS Touch field workflow** | The HS GovTech field manual describes finalizing an inspection for upload to HealthSpace Cloud, then using "Send by Email" for up to three addresses. A City-produced grease-trap record states "Record created. Uploaded from HSTouch." | Mount Pleasant used HS Touch for at least the identified inspection record; the product workflow includes upload and direct-email routes. |
| **Mount Pleasant report** | The March 11, 2025 City-to-Titus-CAD report is a searchable, software-generated PDF. Its metadata names Microsoft Reporting Services and the PDF Rendering Extension. | At least this Mount Pleasant report family could be generated and sent electronically without a paper-scan lifecycle. |
| **Requested medium** | The OAG handbook reproduces § 552.228(b): when the stated conditions are met, a governmental body shall provide the copy in the requested electronic medium. | Capability and the statutory conditions should be determined for the responsive record family and requested medium—not by a categorical assumption. |

### The narrow point

The attached material does not establish a universal export method for every City repository. It does establish concrete electronic routes and makes a request-specific explanation—record family, module, configuration, selected route, and available output—more probative than a categorical "print and scan" assertion.

# SOURCE INDEX, PROVENANCE, AND LIMITS

| Pages | Source and limited relevance |
|---|---|
| **X-005** | 2026 OAG Public Information Act Handbook, PDF p. 41 (printed p. 29): § 552.228(b) electronic-medium conditions. |
| **X-006** | Fort Worth's August 24, 2026 response authenticating the enclosed Environmental Services records produced for request R007 646-081 126. |
| **X-007–X-010** | Fort Worth-produced January 26, 2023 HS GovTech support email and screenshots: "Allow Export," export layout, checked-record Excel/CSV, entire-set Excel, and the City's request to add export functions. |
| **X-011** | Fort Worth-produced May 2019 permit workflow manual: browser controls may download the generated permit as a file or print it. |
| **X-012–X-015** | Archived 2023 HealthSpace support pages: allow-export configuration; entire filtered record-set Excel download; printform download/email/print; and history entries for email, print-to-PDF, and export. |
| **X-016–X-022** | HS Touch field-manual pages and the two City production routes compared at X-004: October 31 grease/FOG production and November 12 October 28 inspection production. |
| **X-023–X-024** | Native March 11, 2025 EML rendering and representative software-generated permit report transmitted by the City to Titus CAD. |

### Mount Pleasant report controls

| Report | Creator / producer | Creation time | Pages |
|---|---|---|---|
| December 2024 | Microsoft Reporting Services 2025.2.0.0 / PDF Rendering Extension 2025.2.0.0 | Mar. 11, 2025, 9:55:41 a.m. CDT | 6 |
| January 2025 | Microsoft Reporting Services 2025.2.0.0 / PDF Rendering Extension 2025.2.0.0 | Mar. 11, 2025, 9:57:05 a.m. CDT | 6 |
| February 2025 | Microsoft Reporting Services 2025.2.0.0 / PDF Rendering Extension 2025.2.0.0 | Mar. 11, 2025, 9:58:01 a.m. CDT | 7 |

The native EML produced by Titus CAD identifies John Ankrum <jankrum@mpcity.org> as sender, Shirley Dickerson and City personnel as recipients, the subject "RE: PERMITS AND FIRE REPORTS," and the three PDFs as attachments. The metadata identifies the last PDF-generating software and timestamps; it does not by itself establish every earlier step in the records' lifecycle.

### Configuration and completeness limits

Fort Worth's records and the archived vendor pages show product capabilities and configuration choices, not Mount Pleasant's enabled settings on a particular date. Only selected pages are reproduced. The complete source files remain available for inspection. The archived pages display their Wayback URLs and capture timestamps on the face of the PDFs.

## MOUNT PLEASANT HS TOUCH / HSCLOUD USE AND PRODUCTION ROUTES

The following comparison separates the underlying City system record from the later PDF container selected for production. It also distinguishes the two grease-trap records contained in the October 31 file.

| City-produced item | What the City system record shows | Production container and timing |
|---|---|---|
| **October 31 grease / FOG production** | The two-page file contains a July 31 record at page 1 and a January 31 record at page 2. Page 2 displays the City of Mount Pleasant Inspection Manager / HSCloud URL and states: “Record created. Uploaded from HSTouch.” It also records a later “Successful generation.” | Webster transmitted the file on October 31, 2025. The PDF was created October 20 by a RICOH IM C4500. Each page is one full-page 300-dpi raster image, and the PDF contains no fonts. This is a scanned production container. |
| **November 12 October 28 inspection production** | The record displays “Inspection Manager \| City of Mount Pleasant TX \| HSCloud,” an HSCloud entry URL, and an October 28 record-creation history. The reproduced pages are internally inconsistent: page 1 displays Complaint Number FS-473 734, while page 2 displays FS-473 844. X does not resolve that discrepancy. | Webster transmitted the record on November 12, 2025. Its PDF metadata identifies Bluebeam Stapler / Bluebeam Brewery and an October 30 creation time. The pages are primarily PDF drawing/text objects rather than full-page raster scans. |

### Documented HS Touch route

The 2024 HS GovTech HSTouch field manual states that, once the printed report is complete, the inspection is finalized for emailing and syncing to HealthSpace Cloud. After upload, the user can press Print, select “Send by Email,” enter up to three email addresses, and send the report. The January 31 City record supplies the Mount Pleasant-specific link: its own history states that it was uploaded from HSTouch.

### Careful inference

These records support three narrow points: Mount Pleasant used HS Touch for at least the identified grease-trap inspection; HS Touch documented an electronic upload-and-email workflow; and the City used materially different PDF-production routes for HSCloud records. A later scanned production does not establish that the underlying record was paper or that HSCloud lacked an electronic output. The metadata does not establish why a particular route was selected, and this exhibit does not assume that every module or record had identical settings.

### Relationship to earlier-filed material

Filed Exhibit Volume 3, Exhibit O, PDF pages 67–73 discuss the July 31 grease-trap record and its later production. Filed Exhibit Volume 2, PDF pages 485 and 490 identify the City’s October 28 HSCloud / Inspection Manager record. X adds the source pages and production-route comparison without repeating the longer completeness arguments.

Open Records Decision No. 660 (1999) — section 52(a) of article III of the Texas Constitution does not prohibit the Port of Corpus Christi Authority from releasing a computer generated digital map, created by the Port with public funds, in response to a request made under Chapter 552 of the Government Code;

Open Records Decision No. 633 (1995) — a governmental body does not comply with the Public Information Act by releasing to the requestor another record as a substitute for any specifically requested portions of an offense report that are not excepted from required public disclosure, unless the requestor agrees to the substitution;

Open Records Decision No. 571 (1990) — the Public Information Act does not give a member of the public a right to use a computer terminal to search for public records; and

Open Records Decision No. 243 (1980) — a governmental body is not required to compile or extract information if the information can be made available by giving the requestor access to the records themselves.[111]

## E. Computer and Electronic Information

Section 552.228(b) provides:

> **If public information exists in an electronic or magnetic medium, the requestor may request a copy in an electronic medium, such as on diskette or on magnetic tape. A governmental body shall provide a copy in the requested medium if:**
>
> **(1) the governmental body has the technological ability to produce a copy of the requested information in the requested medium;**
>
> **(2) the governmental body is not required to purchase any software or hardware to accommodate the request; and**
>
> **(3) provision of a copy of the information in the requested medium will not violate the terms of any copyright agreement between the governmental body and a third party.**

If a governmental body is unable to provide the information in the requested medium for any of the reasons described by section 552.228(b), the governmental body shall provide the information in another medium that is acceptable to the requestor.[112] A governmental body is not required to use material provided by a requestor, such as a diskette, but rather may use its own supplies to comply with a request.[113]

A request for public information that requires a governmental body to program or manipulate existing data is not considered a request for the creation of new information.[114] Pursuant to section

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111 *See also* Open Records Decision Nos. 512 (1988), 465 (1987), 144 (1976).

112 Gov't Code § 552.228(c).

113 Gov't Code § 552.228(c).

114 *Fish v. Dallas Indep. Sch. Dist.*, 31 S.W.3d 678, 681-82 (Tex. App.—Eastland 2000, pet. denied); *see* Gov't Code § 552.231; Attorney General Opinion H-90 (1973); Open Records Decision Nos. 452 at 2-3 (1986), 87 (1975).

**From:** **Fort Worth Open Records Center** fortworth@govqa.us
**Subject:** [Records Center] Open Records Request :: R007646-081126
**Date:** August 24, 2026 at 10:02 AM
**To:** [redacted]

**Attachments:**
R007646-081126.zip

--- Please respond above this line ---

FORT WORTH

08/24/2026

Kyle Moring

,

RE: Public Information Request R007646-081126

Dear Kyle Moring,

This letter responds to your request for information to the City of Fort Worth, dated and received in our office on 8/11/2026 6:18:12 PM.

Information Requested: - To the City Secretary's Office:
Under the Texas Public Information Act, Chapter 552, Government Code, I request two items relating to the software used by the Environmental Services Department, Consumer Health Division, for food, pool, and childcare inspections:
1. The executed agreement between the City and HS GovTech Solutions Inc. (also known as HS GovTech USA Inc., HealthSpace Data Systems Ltd., or HealthSpace USA Inc.), including any statement of work, scope of work, appendices, quotes, and amendments.
2. Any user manual, training guide, or written operating procedure for the HSCloud Suite software maintained by the Department for the use of its own staff.
This request is limited to those two items. I am not requesting email, correspondence, or any search of individual mailboxes.
Please provide the records electronically as PDF files. If any charge is anticipated, please let me know the amount before proceeding.

Respectfully,
Kyle Douglas Moring
[redacted]

The City of Fort Worth Environmental Services has reviewed its files and has located the enclosed documents that are responsive to your request. Although the Public Information Act allows a governmental body to charge for copying documents, the enclosed is being provided to you at no charge. However, since your request was assigned to multiple departments, you may be receiving additional responses.

If you have any questions, or wish to discuss this further, you may contact me at 817-392-6304.

Sincerely,
Veronica Mendez

Environmental Services

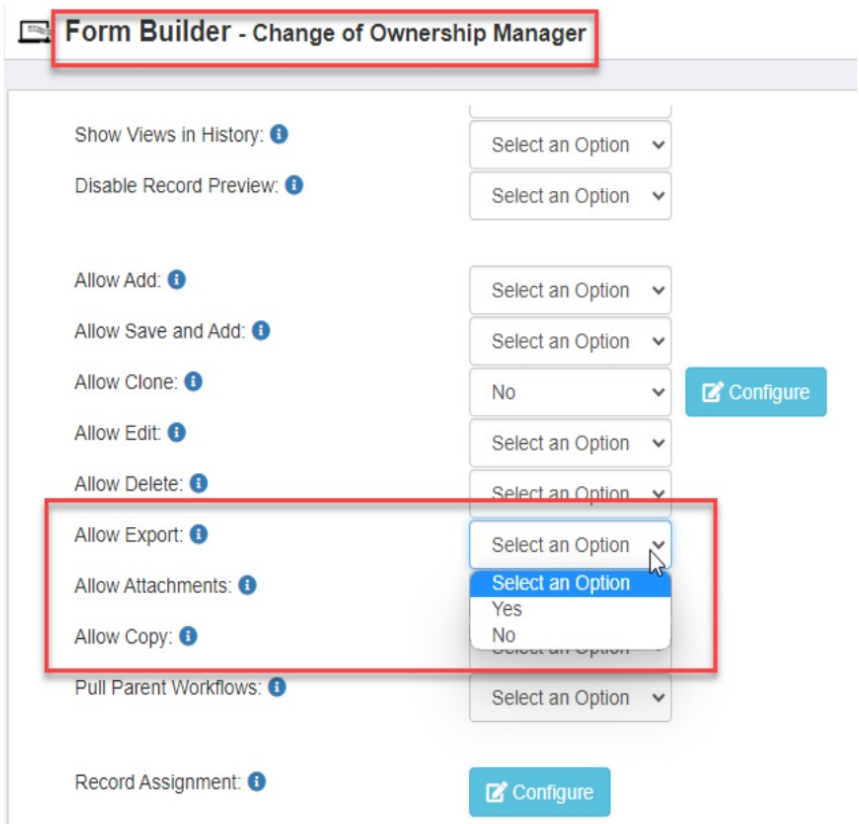
To monitor the progress or update this request please log into the Open Records Center

Powered by GovQA

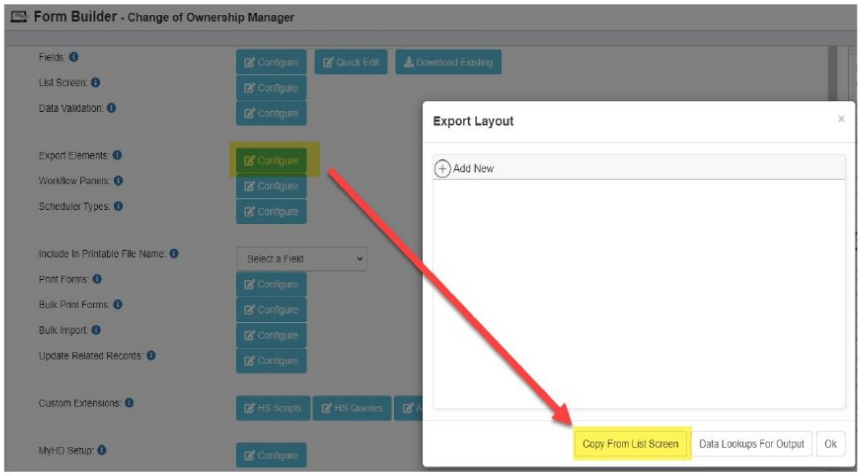
**From:** HealthSpace
**To:** Turpen, (Wyndie), Gwynne
**Subject:** Re: CFW: COO Manager Report
**Date:** Thursday, January 26, 2023 1:32:36 PM
**Attachments:** image-Jan-26-2023-07-27-11-1027-PM.png
image-Jan-26-2023-07-29-35-0039-PM.png
image-Jan-26-2023-07-29-54-0127-PM.png
image-Jan-26-2023-07-30-36-2257-PM.png
image-Jan-26-2023-07-31-54-7613-PM.png

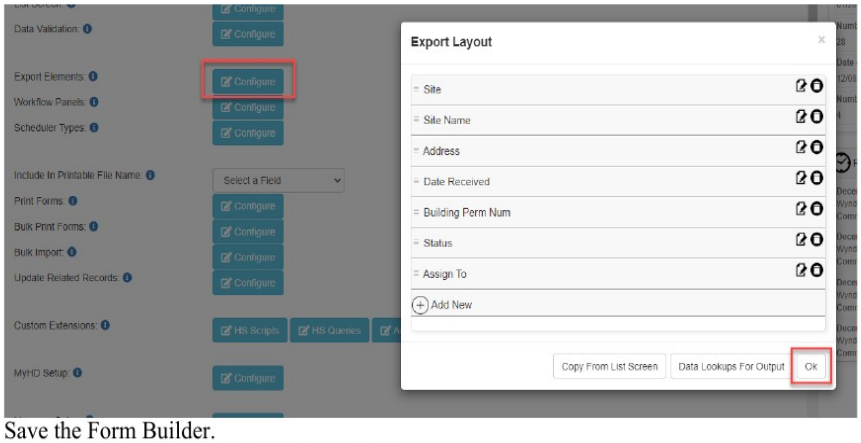
**CAUTION:** This email originated from outside of the City of Fort Worth email system. Do not click any links or open attachments unless you recognize the sender and know the content is safe.

Hi Wyndie,
I set it up with the List Screen items. Here's how it's done:
Find allow export and change to Yes. Then save the form builder:

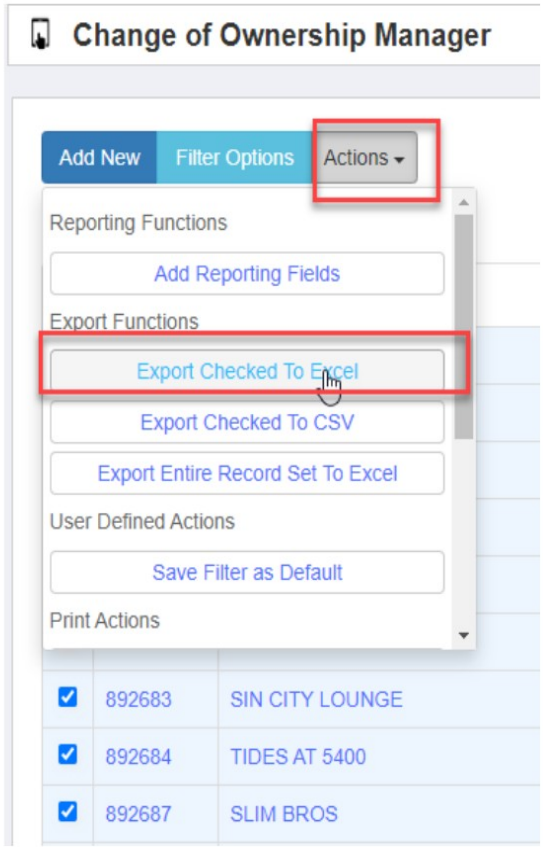



Then set up the layout for the export here: (You can pick and choose individual items by using the Add New Button but Copy from List Screen is easiest)


Form Builder - Change of Ownership Manager
Fields:
Configure
Quick Edit
Download Existing
List Screen:
Configure
Data Validation:
Configure
Export Elements:
Configure
Workflow Panels:
Configure
Scheduler Types:
Configure
Include In Printable File Name:
Select a Field
Print Forms:
Configure
Bulk Print Forms:
Configure
Bulk Import:
Configure
Update Related Records:
Configure
Custom Extensions:
HS Scripts
HS Queries
MyHD Setup:
Configure
Export Layout
Add New
Copy From List Screen
Data Lookups For Output
Ok




Save the Form Builder.
Now the Export Checked to XX is available:




Regards,
Bev

Bev Hoffmann
Support Team Member
HS GOVTECH
https://support.gethealthspace.com/en/user-guides
**HS Cloudsuite Support: 1-866-860-4224 Press "1"**
**Direct: 1-866-860-4224 Ext. 2016**
**Bev@hscloudsuite.com**
**To check if your issue is already being addressed visit here:**
Check Status of HSGovTech CloudSuite
https://status.hscloudsuite.com




On Thu, Jan 26, 2023 at 10:47 AM, Turpen, (Wyndie), Gwynne <Wyndie.Turpen@fortworthtexas.gov> wrote:

> Please add the export functions to the actions on the Change of Ownership Manager list screen for CFW.
>
> Thank you,
>
> Wyndie

---

**From:** Neff, Stephanie K <Stephanie.Neff@fortworthtexas.gov>
**Sent:** Thursday, January 26, 2023 12:27 PM
**To:** Turpen, (Wyndie), Gwynne <Wyndie.Turpen@fortworthtexas.gov>
**Cc:** Cordero, Leticia <Leticia.Cordero@fortworthtexas.gov>; Franco, Arturo <Arturo.Franco@fortworthtexas.gov>; Balusek, Jordan <Jordan.Balusek@fortworthtexas.gov>; Langat, Charles <Charles.Langat@fortworthtexas.gov>
**Subject:** COO Manager Report

Are we able to get a report for the COO manager? "Export checked to Excel"

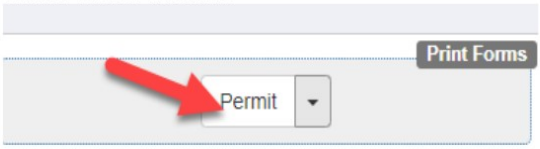



City of Fort Worth

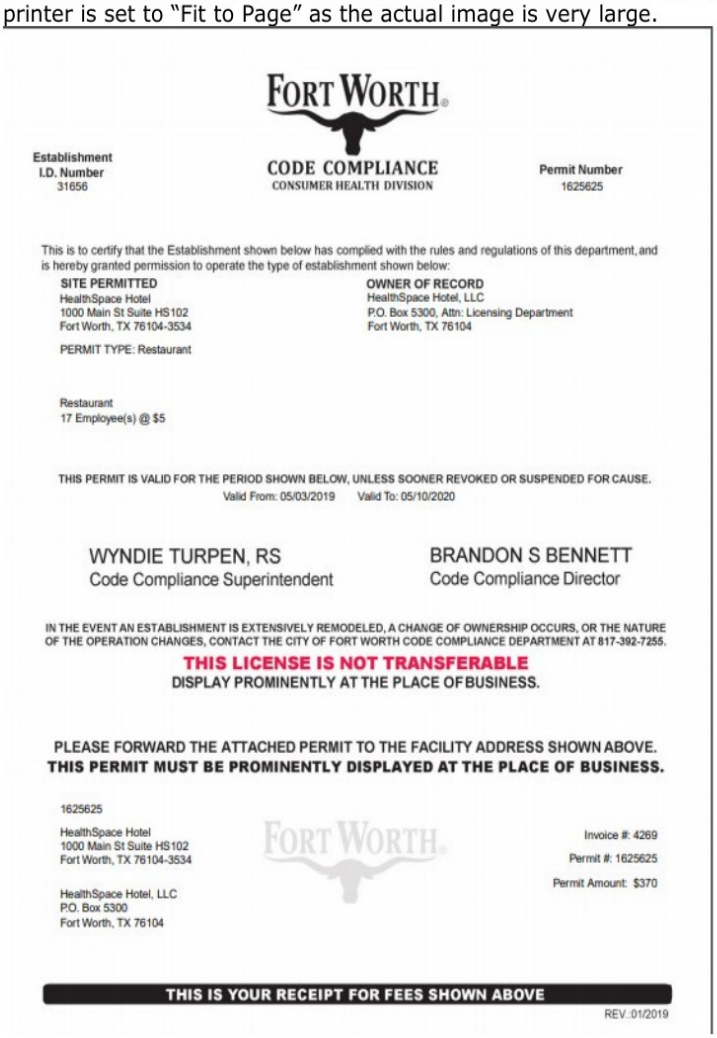
Stephanie Neff
Senior Consumer Health Specialist

Consumer Health Division

10. Click on the word Permit in the Print Forms list on the top right hand corner of the window.




11. Use the controls in your browser window to expand or shrink the display; to download as a file or print directly to a printer. Note: Make sure the printer is set to "Fit to Page" as the actual image is very large.



FORT WORTH

CODE COMPLIANCE
CONSUMER HEALTH DIVISION

Establishment I.D. Number 31656

Permit Number 1625625

This is to certify that the Establishment shown below has complied with the rules and regulations of this department, and is hereby granted permission to operate the type of establishment shown below:

**SITE PERMITTED**
HealthSpace Hotel
1000 Main St Suite HS102
Fort Worth, TX 76104-3534

**OWNER OF RECORD**
HealthSpace Hotel, LLC
P.O. Box 5300, Attn: Licensing Department
Fort Worth, TX 76104

PERMIT TYPE: Restaurant

Restaurant
17 Employee(s) @ $5

THIS PERMIT IS VALID FOR THE PERIOD SHOWN BELOW, UNLESS SOONER REVOKED OR SUSPENDED FOR CAUSE.
Valid From: 05/03/2019 Valid To: 05/10/2020

WYNDIE TURPEN, RS
Code Compliance Superintendent

BRANDON S BENNETT
Code Compliance Director

IN THE EVENT AN ESTABLISHMENT IS EXTENSIVELY REMODELED, A CHANGE OF OWNERSHIP OCCURS, OR THE NATURE OF THE OPERATION CHANGES, CONTACT THE CITY OF FORT WORTH CODE COMPLIANCE DEPARTMENT AT 817-392-7255.

**THIS LICENSE IS NOT TRANSFERABLE**
DISPLAY PROMINENTLY AT THE PLACE OF BUSINESS.

PLEASE FORWARD THE ATTACHED PERMIT TO THE FACILITY ADDRESS SHOWN ABOVE.
THIS PERMIT MUST BE PROMINENTLY DISPLAYED AT THE PLACE OF BUSINESS.

1625625

HealthSpace Hotel
1000 Main St Suite HS102
Fort Worth, TX 76104-3534

HealthSpace Hotel, LLC
P.O. Box 5300
Fort Worth, TX 76104

FORT WORTH

Invoice #: 4269
Permit #: 1625625
Permit Amount: $370

THIS IS YOUR RECEIPT FOR FEES SHOWN ABOVE

REV.:01/2019

HS CUVTECH

HS Cloud

Back to home

# How to Configure Form Builder to Export Data and then Export

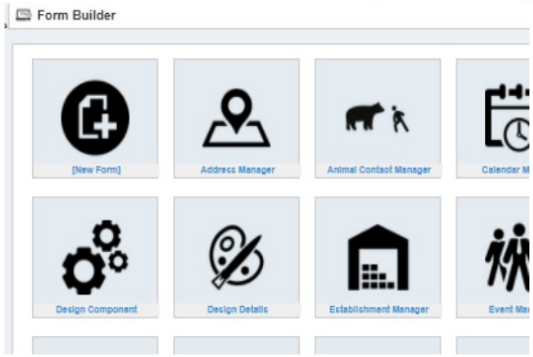
When a list has the option to export data, three choices are available.

Configuring Form Builder

Creating the Export File

## Configuring Form Builder

1. Go to Form Builder and select the utility to create an export template.




2. Scroll down to make sure the option “Allow Export” is set to “Yes”.

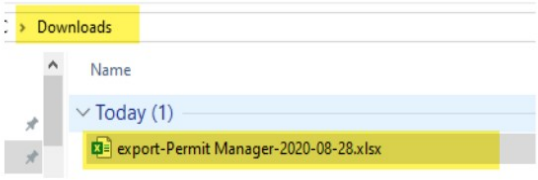
Has the same method as "a" but the output file is a comma separated value file (.csv) that can be used more universally and has no text formatting.

c. **Export Entire Record Set To Excel**

The entirety of the filtered records will be exported to an Excel file. Checkmark selection is not necessary, and the records do not have to be all displayed in one page.

3. Click on an option to download the file which in Chrome is visible on the bottom left of the browser page.

4. Click to open or use the side menu or look in the download folder on the computer for the file:




Example of the Export File:

Return to Top




### Export Elements

If **Allow Export** option is YES, the columns that will be displayed in the output can be organized.


### Workflow Panels

Related data panels are the relational aspect of the database. Please be sure that anyone who modifies these relationships truly understands how relationships between tables in databases work, and have been trained before adding, editing or removing a related data panel. Consult HealthSpace staff for training.


### Scheduler Event Types

Defines an action that will be performed after a record is saved, Such as schedule an inspection or send an email or a text.


### Include In Printable File Name

Printforms such as permits can be printed as individual files by selecting checked records in the list view. This feature adds the contents of a field name as part of the filenames generated.


### Print Forms

Printforms can be described as any static image file where fields from the Form Builder or related Form Builders, where the data is in the List Screen of the Form Builder being used, are populated with mapped fields that are viewed from a form screen and can be downloaded, emailed or printed.




### Bulk Print Forms

This feature is not currently available for front-end users.


Example of how Bulk Printing is utilized.


### Bulk Import

This feature will be implemented by a HealthSpace representative or HS support staff.

the system as a draft.



### Change Tracking

This is a toggle option. For any of the screens/tools within the system, enable "Change tracking" option, to require users to make a comment if they change a record, and the system keeps track of all changes made to the record.



### Show Views in History

This is a toggle option. A written entry in the History Panel will log and describe such actions as emailed, printed as PDF etc. by the user. Related to **Show History** Option.



### Allow Add

Some Tools are standalone or do not need a parent record. Those tools will have this option as "Yes". This option allows admin to make sure such items as inspections are created from the Parent Permit in the Workflow panel.



### Allow Save and Add

With this option, a new record will automatically open after saving the previous. This is useful for small list forms.



### Allow Clone

Do on activate this tool. See **Allow Copy** option.



### Allow Edit

The default for this option is Yes. Selecting No causes a saved record to be locked to editing.



### Allow Export

This is a toggle option. Setting to Yes allows records from this tool to be exported from the list screen. See **Export Elements**.



### Allow Attachments

This is a toggle option. For any of the screens/tools within the system, enabling the "Attachment" feature allows for uploading and attaching outside electronic documents to the records within the

3. Use the blue Back button to return to the inspection entry to make any corrections while viewing the Print Report.



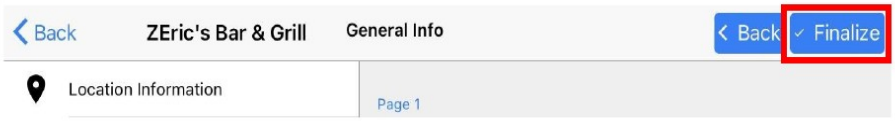

## Finalizing, Uploading and Emailing the Inspection Report

Once the Printed Report is deemed complete, the inspection is finalized for emailing and syncing of the data to HealthSpace Cloud.

1. Press the Back button to return to inspection entry view.



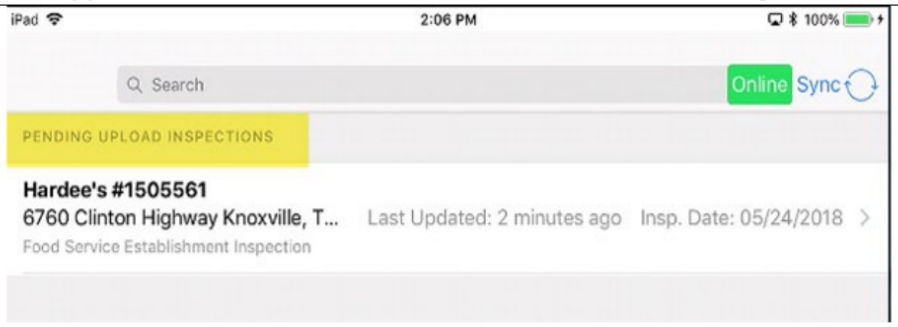

2. Press "Finalize" at the top right side of the screen.




3. If any mandatory fields have not been completed a message will appear.

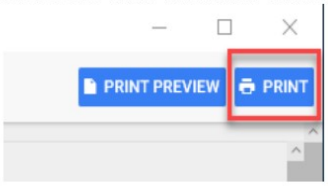



Make any edits necessary and try again.

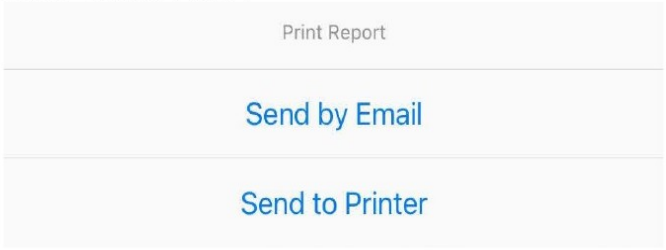



If you are connected to the internet and selected Upload, you can now send emails of the report.

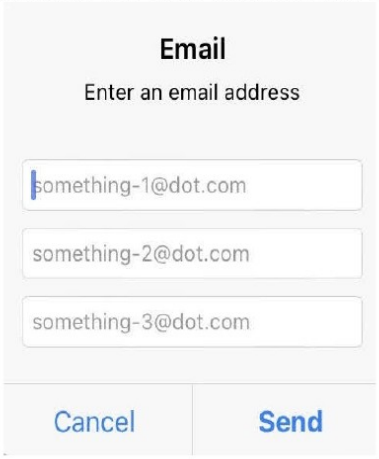
8. Press the Print button to email or print.




9. Select "Send by Email".




10. Fill in up to 3 email addresses and press the Send button.



**From:** **Candias Webster** cwebster@mpcity.org
**Subject:** RE: Texas PIA – Three Separate Requests (Please Assign Separate Tracking Nos.) – Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, TX – 1/1/2021–10/18/2025
**Date:** October 31, 2025 at 3:29 PM
**To:** Kyle Moring [redacted]
**Cc:** Austin Beck abeck@dtrglaw.com

CW

Good afternoon, Kyle,

1. Fire – Please find attached "Fire Action Code, Fire Inspection 07-23-21, and Fire Inspection 9-11-224 documents related to request #1
2. Utilities – Please find attached 2025102011220189 related to request #2. We did turn their water off a few times for water line breaks that were Walmart's repairs, their own lines, but we don't document turning off water.
3. We have no information for this request.

We will consider these requests closed as of today.

**Thank you,**
**Candias Webster, TRMC, CMC**
**Assistant City Manager/ City Secretary**
**City of Mt. Pleasant**
**Office: 903-575-4154**
**Cell:** [redacted]
**Fax: 903-577-1828**

**ATTENTION OFFICIALS**: A "Reply to All" on this e-mail or reply or forward to one other official could lead to violations of the Texas Open Meetings Act. Please reply only to the sender.

*CONFIDENTIALITY NOTICE: This e-mail is intended solely for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, dissemination, copying, printing, or other use of this e-mail by persons or entities other than the addressee is prohibited. If you have received this e-mail in error, please contact the sender immediately and delete the material from your computer.*

**From:** Kyle Moring [redacted]
**Sent:** Saturday, October 18, 2025 1:04 PM
**To:** Candias Webster <cwebster@mpcity.org>
**Cc:** Austin Beck <abeck@dtrglaw.com>
**Subject:** Texas PIA – Three Separate Requests (Please Assign Separate Tracking Nos.) – Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, TX – 1/1/2021–10/18/2025

CAUTION: [EXTERNAL EMAIL]

* **Inspection Date:** 01/31/2025

* **Inspector:** Juan Ramirez

**Accompanied By:**

* **Purpose:** Routine

Grease Trap Inspection Violations

Search violations

*Only the first 20 results will be displayed. For better results, enter more characters.*

Grease Trap Inspection

**Inspection Outcome:** Passed

**Next Inspection Date:** mm/dd/yyyy

Conversations

No conversations found

Record History

**06/11/2025 08:08 AM CDT - John Ankrum**
Records are not available to compare
**Comment:** Successful generation.

**01/31/2025 04:43 PM CST - Juan Ramirez**
Original record not available to compare
**Comment:** Record created. Uploaded from HSTouch

**From:** **Candias Webster** cwebster@mpcity.org
**Subject:** RE: TPIA Request — Records re City meeting/visit with Walmart #131 management on/about October 28, 2025
**Date:** November 12, 2025 at 2:55 PM
**To:** Kyle Moring [redacted]
**Cc:** Austin Beck abeck@dtrglaw.com

CW

Good afternoon, Kyle,

Here is the information you requested and this request is closed as of 11/12/2025

**Thank you,**
**Candias Webster, TRMC, CMC**
**Assistant City Manager/ City Secretary**
**City of Mt. Pleasant**
**Office: 903-575-4154**
**Cell:** [redacted]
**Fax: 903-577-1828**

**ATTENTION OFFICIALS**: A "Reply to All" on this e-mail or reply or forward to one other official could lead to violations of the Texas Open Meetings Act. Please reply only to the sender.

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**From:** Kyle Moring [redacted]
**Sent:** Wednesday, October 29, 2025 6:46 AM
**To:** Candias Webster <cwebster@mpcity.org>
**Cc:** Austin Beck <abeck@dtrglaw.com>; Rob Vine <rvine@mpcity.org>; Wesley Lyon <wlyon@mpcity.org>
**Subject:** TPIA Request — Records re City meeting/visit with Walmart #131 management on/about October 28, 2025

CAUTION: [EXTERNAL EMAIL]

Ms. Webster,

Under the Texas Public Information Act, please provide **all records** reflecting or arising from any **City** meeting or site visit with **Walmart Store #131 management** (2311 S. Jefferson Avenue, Mount Pleasant, Texas 75455) **on or about October 28, 2025** (± 3 days).

**Custodians & systems to search:**

HSCloud **City of Mount Pleasant TX**

Inspection Manager

**Permit Manager**

**Address:** 2311 S Jefferson Ave Mount Pleasant, TX 75455-6011
**Permit Name:** Wal-Mart Store
**Permit Number:** 2329
**Program:** Food
**Permit Type:** Food Establishment
**Device Type:**
**Catalog Number:**
**Establishment Name:** Wal-Mart
**Issue Date:** 12/31/2024
**Expiration Date:** 12/31/2025
**Date License Paid:** 12/19/2024
**Status:** Permitted
**Issuance Reason:**
**Latest Invoice Date:** 10/20/2025
**Latest Invoice Number:** 2242
**Invoice Total:** $275.00
**Invoice Balance:** $275.00
**Owner:** Wal-Mart Licensing- Grocery
**Owner Address:** 702 SW 8th St Stop 500NULL Bentonville AR 72716-6209
**Risk:**
**Assigned To:** Osiel Martinez
**Next Routine Inspection Due:** 03/16/2026
**GPS:** 33.13543 -94.96807
**Legacy Permit Number:** 2329
**Complaint Number:** FS-473734
**Complaint Address:** 2311 S Jefferson Ave Mt Pleasant TX 75455
**Complaint Type:** Food Service Complaint
**Last Inspection Date:** 10/28/2025
**Score:**
**Address:** 2311 S Jefferson Ave Mount Pleasant, TX 75455-6011

Conversations

No conversations found

Record History

**10/28/2025 11:49 AM CDT - Osiel Martinez**
Original record not available to compare
**Comment:** Record created.

**Permit Name:** Wal-Mart Store
**Permit Number:** 2329
**Program:** Food
**Permit Type:** Food Establishment
**Device Type:**
**Catalog Number:**
**Establishment Name:** Wal-Mart
**Issue Date:** 12/31/2024
**Expiration Date:** 12/31/2025
**Date License Paid:** 12/19/2024
**Status:** Permitted
**Issuance Reason:**
**Latest Invoice Date:** 10/20/2025
**Latest Invoice Number:** 2242
**Invoice Total:** $275.00
**Invoice Balance:** $275.00
**Owner:** Wal-Mart Licensing- Grocery
**Owner Address:** 702 SW 8th St Stop 500NULL Bentonville AR 72716-6209
**Risk:**
**Assigned To:** Osiel Martinez
**Next Routine Inspection Due:** 03/16/2026
**GPS:** 33.13543 -94.96807
**Legacy Permit Number:** 2329
**Complaint Number:** FS-473844
**Complaint Address:** 2311 S Jefferson Ave Mount Pleasant TX 75455-6011
**Complaint Type:** Food Service Complaint
**Last Inspection Date:** 10/28/2025
**Score:**

Required fields are marked with an asterisk *

* **Inspection Date:** 10/28/2025

* **Inspector:** Osiel Martinez

## RENDERING OF NATIVE EML — CORE HEADERS AND TRANSMITTAL

Source: native EML produced by Titus CAD; this page is a disclosed rendering, not a replacement for the native file.

| | |
|---|---|
| From: | John Ankrum <jankrum@mpcity.org> |
| To: | Shirley Dickerson <shirley.dickerson@titus-cad.org>, Candias Webster <cwebster@mpcity.org>, Lynn Barrett <LBarrett@mpcity.org>, Regina Reynolds <rreynolds@mpcity.org> |
| Date: | Tue, 11 Mar 2025 14:59:09 +0000 |
| Subject: | RE: PERMITS AND FIRE REPORTS |
| Message-ID: | <DS0PR16MB529625DFE4E03C83CF94D661D0D12@DS0PR16MB5296.namprd16.prod.outlook.com> |

---

Attachments identified in the native MIME container

- February 2025.pdf (211,975 bytes)
- January 2025.pdf (207,702 bytes)
- December 2024.pdf (208,038 bytes)

---

Relevant text (thread shortened after the immediate request)

> Here you go. From: Shirley Dickerson <shirley.dickerson@titus-cad.org> Sent: Tuesday, March 11, 2025 9:54 AM To: John Ankrum <jankrum@mpcity.org>; Candias Webster <cwebster@mpcity.org>; Lynn Barrett <LBarrett@mpcity.org>; Regina Reynolds <rreynolds@mpcity.org> Subject: RE: PERMITS AND FIRE REPORTS CAUTION: [EXTERNAL EMAIL] Good morning, I misspoke. It looks like we received a list in December. I have attached an example of the permit list we typically get. We would just need December through February permits and any fire reports of damage. Thank you.

Omission disclosed: earlier quoted messages and signatures below the immediate request are not reproduced on this one-page rendering.

`Native EML SHA-256: 098afc7c7227e0c4c85b71c74bfb98f30f1a330a1c3ef20f4e13b596eb0dc087`

# Building Permits Issued
## Monthly Report
December 2024-2025

| Type | Permit # | Name | Address | Date Paid | Fees Due | Valuation |
|---|---|---|---|---|---|---|
| Certificate of Occupancy | COI3444 | | | | $0.00 | **$0.00** |
| | COI3445 | | | | $0.00 | **$0.00** |
| | COI3482 | | | 12/2/2024 | $50.00 | **$0.00** |
| | COI3484 | | | 12/5/2024 | $50.00 | **$0.00** |
| | COI3486 | | | | $0.00 | **$0.00** |
| | | | | 12/19/2024 | $50.00 | **$0.00** |
| **Total** | **5** | | | | **$150.00** | **$0.00** |
| Concrete | FW3482 | | | 12/2/2024 | $94.75 | **$3,000.00** |
| | FW3485 | | | 12/11/2024 | $50.00 | **$0.00** |
| | FW3487 | | | 12/26/2024 | $75.00 | **$0.00** |
| **Total** | **3** | | | | **$219.75** | **$6,000.00** |

**CAUSE NO. 44437**

| | | |
|---|---|---|
| KYLE DOUGLAS MORING,<br>Petitioner, | § | IN THE DISTRICT COURT OF |
| v. | § | TITUS COUNTY, TEXAS |
| CITY OF MOUNT PLEASANT, TEXAS,<br>Respondent. | § | 76th JUDICIAL DISTRICT |

# PETITIONER'S PROPOSED EXHIBIT Y
# RESPONDENT'S AUGUST 25, 2026 FOCUSED-CONFERRAL RESPONSE, SEARCH MATERIALS, AND PRIOR CONTROLS

## Limited purpose

This twenty-five-page exhibit consists of this five-page cover, compact source controls at Y-006 through Y-010, Respondent's complete fourteen-page August 25 attachment at Y-011 through Y-024, and one preserved April 1/April 4 OneDrive folder-state control at Y-025. The complete attachment is included to preserve context. Its factual descriptions of searches, productions, counts, dates, and current status are offered as Respondent's supplied account through counsel and for comparison with independent records; alternatively, they show notice, chronology, materials supplied, and conferral posture. Assertions of compliance, good faith, and the Court's oral direction are disputed advocacy positions, not sworn proof. Nothing is offered to prove counsel's intent, bad faith, personal liability, or the truth of an underlying allegation. The August 11 submission separately identified C, E, F, G, and I and included the complete requests and request-specific protocols.

## Observable points for the focused hearing

| | |
|---|---|
| **E/F assignment and estimate controls** | On January 12, Webster forwarded both request families to Bryan and asked him to gather the information. This establishes assignment and timing, not the exact queries, custodians, repositories, or results. The January 14 E/F estimates identify and address Kyle Moring but both say 'Dear Mr. Bolster.' Filed Volume 1 pages 125 and 153. The repeated mismatch is noted only as a document-preparation anomaly; it does not prove that another requestor's search or estimate was used. |
| **Exhibit C materials** | The letter identifies the December 4 request for Buhman's personal-phone call history but treats November 3-13 material as responsive and says C-2/C-3 were reattached. That folder contains five radio WAV files and three screenshots of two text threads-not call history-and the fourteen-page PDF contains no C-2/C-3 label or embedded file. The November 3 request sought original-resolution screenshots, native exports, or printable transcripts with each message's sent/received time and sender/recipient; the November 12 narrowing reiterated per-message timestamps. Filed Volume 1 pages 82-86. The Carrie image shows one 'Wednesday 8:47 AM' header above the first of three messages; the overlapping Beasley images show no message times. Nipp supplied a separate typed list and directed Petitioner to it; no image or export ties each listed time to corresponding content. This is source-and-format completeness, not an assertion that the list is inaccurate. On December 17, Webster supplied two typed call summaries and declined screenshots because numbers appeared despite permitted redaction. Later PNGs of the two on-device call entries show no telephone number; Webster sent them to OAG on May 12, and Petitioner first received them June 2. Y-008 to Y-009. Petitioner does not claim those PNGs existed in December; no on-device source copy or voicemail-log entry accompanied the December response or August 25 package. |

## Observable points for the focused hearing - continued

| | |
|---|---|
| **Exhibit E searches** | The attachments do not document one unchanged, reproducible search. The January 13 panel uses generic keyword and Date criteria through December 29, 2025 and reports 6,316 estimated matches, 10.3 GB, and 209 of 910 locations with hits-not 290 as the letter states. The August 13 panel uses a materially different kind:email query, sent/received date legs through December 30, and different participant/free-text logic; it reports 5,991 estimated matches, 8.9 GB, and 174 of 984 locations. The later search occurred after the August 11 conferral. The letter does not explain who changed or reran it, why, whether the results were reviewed or exported, or whether any delta was produced. The August 7 OneDrive folder modification dates are not search-completion times. |
| **February 2 inventory** | The preserved City-delivered ZIP contains 364 file entries: 362 Outlook MSG files and two system artifacts. The MSGs contain 230 distinct Message-ID values, reflecting 132 additional cross-custodian copies, and 266 embedded attachment objects. These are delivered-file counts, not search-hit or responsiveness findings. No supplied export manifest reconciles either search estimate to items reviewed, deemed responsive or nonresponsive, deduplicated, withheld, exported, or delivered. The estimates therefore do not establish how many responsive records remained, but the production chain is unreconciled. |
| **Exhibit F materials** | The original request stated two independent components: all email sent to or received from @walmart.com or @wal-mart.com, and, 'In addition,' records matching Walmart terms. Filed Volume 1 pages 149-151. The letter instead describes the listed entries collectively as subject/body/attachment keywords and transcribes the second domain as @walm-mart.com. Its condition-builder screen uses the correct @wal-mart.com, but visibly joins the keyword block to Participants with AND; it does not show a separate domain-only run or an OR/union covering the two requested components. If executed as depicted, the shown query would require both conditions rather than either requested branch standing alone. The narrative spelling error therefore is not offered as proof that the actual search used the wrong domain, but the supplied screen does not facially demonstrate both requested sets. The letter assigns 5,991 possible matches in 174 of 984 locations to the January Walmart search. Its final statistics page, however, duplicates the August 13 Moring panel, displaying the Moring query and the same 5,991/174-of-984 figures. No Walmart results panel is supplied, so the attachments do not reconcile which query generated those figures. |

## Observable points for the focused hearing - continued

| | |
|---|---|
| **Statistics and sources** | Both statistics panels warn that the displayed numbers are estimates and do not include file versions, SharePoint folders and lists, or cloud attachments, and recommend a review set or export for a more complete view. The warning does not itself prove those materials were omitted from the final production; it limits what the screenshots establish. The '1/1 data sources' card is an aggregate category count-not proof of one mailbox or system-because the same panels show 910 or 984 locations. No repository list, custodian list, review-set report, or export report is supplied. E-2 is a OneDrive production-folder view, not a Purview search-location log. |
| **Exhibit G status** | The letter identifies 344 potentially responsive emails and states that privilege review remains ongoing. It supplies no completion date and identifies no OAG ruling or previous determination applicable to that set. |
| **February 27 control** | The City-supplied images reproduced at Y-007 show the saved 'Feb_9th_Search' KeyQL, selected sources 'All people and groups' and 'All public folders,' and 'Review_Set_1' containing 12,963 items. The interface also displays review-set and export controls. Filed Volume 1 page 257 contains inline-image placeholders, but not the visible screenshots reproduced here. That separate review-set count is not attributed to Exhibit E. |
| **Exhibit I status** | The letter records a $234 estimate and repeats that over 12,000 emails were populated, then declares the rolling production closed. It does not identify the final query or validated equivalent, gives no final responsive-production count, and does not say whether the omitted May 21 tranche was included in its closure analysis. It says the OneDrive link remains available, but neither the letter nor the 5:03 p.m. transmittal supplies or retransmits that link. |

## Observable points for the focused hearing - continued

| | |
|---|---|
| **Exhibit I delivery chronology** | The letter lists March 27, April 1, and April 21 and calls April 21 the third tranche, but omits Webster's later May 21 transmittal: 'Here is a link to more emails.' Filed Volume 1 page 354. Preserved views show the specifically dated '04-01-2026' subfolder displaying 0 items at 5:03 p.m. April 1 and again April 4; the shared root visibly contained earlier March material. Y-025. A folder name or modified date alone does not establish delivery, and these views do not exclude another delivery route or a later upload. Absent a separate transmittal or route, the asserted April 1 production and omitted May 21 tranche remain narrow chronology points for Respondent to reconcile. |
| **Exhibit I known-record and query control** | The February 9 screen uses agency-domain Participants fields or named-agency Subject terms. Microsoft defines Participants as From, To, Cc, and Bcc. Proposed V-003 through V-004 identifies a unique October 27, 2025 City MSG whose outer envelope is James to Denney and Code Enforcement, cc Buhman; EPA/TCEQ addresses and the referral occur inside the forwarded body. The related October 28 TCEQ-addressed item appeared in the May 21 production, while the separate October 27 outer forward was absent from the preserved March 27, April 21, and May 21 Item 5 tranches reviewed for this supplement and was later produced to [requestor] on August 14. This is an embedded-content and reconciliation control-not proof that particular syntax was legally required, that every related message remains separately maintained, or that an underlying allegation is true. |
| **Scope, safety, and notice** | The letter characterizes Petitioner's concern as dissatisfaction with volume and 'seemingly' content. The contemporaneous record instead identifies search precision, material overinclusion, omitted responsive correspondence, and disclosure of sensitive unrelated material, including Schneider utility/customer and payment records, LES password-reset/authentication-PIN messages, and an embedded unredacted MPPD report packet appearing to reference a federal prosecution. Filed Volume 1 pages 278-280, 354, 358-363, and 378-383; Third Supplement U-005 to U-006 and U-010 to U-011. Beck acknowledged that confidential information had been inadvertently released. The AUSA requested deletion and stated that she already possessed the material through law enforcement. Y-010. The sensitive contents are not reproduced. |
| **H-1 characterization** | The letter treats H-1 as an unclear request or, alternatively, premature discovery. H-1 states on its face that it is a 'proposed hearing aid / summary,' that the underlying records control, and that it does not enlarge the original requests, seek duplicate copies, expose privileged substance, or rely on sensitive MPPD material. It does not identify itself as discovery or seek an order compelling responses. Whether and how the Court uses it remains for the Court; H-1 is not offered as a substitute for the underlying evidence. |

## Source, evidentiary, and duplication controls

Earlier-filed controls not reproduced. First Amended Petition page 41 and filed Volume 1 pages 82-90 identify C-2/C-3 and the per-message-timestamp requests; pages 90 and 96-98 contain the Exhibit C request, Webster's typed-summary response, and Petitioner's source-record follow-up. W-008 contains the later OAG inquiry and Webster's response that screenshots had not been provided. Volume 1 pages 121-125 and 149-153 contain the E/F requests and estimates; Volume 2 pages 257 and 262-266 contain the February 27 transmittal, March 10 Purview/native-export response, and February 25 no-responsive response. Volume 1 pages 278-280, 339, 354, 358-363, and 378-383 contain the March 31, April 21, May 21, and sensitive-production controls; Volume 2 pages 281-284 contain the February 9 Bryan IT assignment; pages 404-408 contain the March 17 transcript excerpt; and Volume 3 page 582 contains the February 27 certification. Third Supplement U-005 to U-006 and U-010 to U-011 contains limited Schneider and inadvertent-release controls. Proposed V-003 through V-004 contains the sanitized October 27 outer-message metadata, embedded EPA/TCEQ routing, and limited search-significance control; those pages are incorporated and not reprinted.

Use of Respondent's letter and limitations. Y-011 through Y-024 reproduce Respondent's complete fourteen-page attachment; no portion is excerpted. Filing or designation does not itself admit the attachment. Petitioner may offer authenticated factual representations made on Respondent's behalf as opposing-party statements under Texas Rule of Evidence 801(e)(2), and may use the communication without regard to truth to show notice, chronology, positions taken, supplied search descriptions and materials, and conferral status. Counsel's legal conclusions are not offered as sworn proof. The communication was a court-directed status/conferral response and contains no proposed exchange of consideration. If Rule 408 applies to any passage, that passage is not offered as a compromise admission; pre-existing records are offered on independent grounds. Complete reproduction preserves Rules 106 and 107; any limited use remains subject to Rules 105, 403, 408, foundation, and the Court's ruling. Any embedded third-party statement offered for its truth would require an independent basis under Rule 805.

Sources and preservation. Austin R. Beck email to Kyle Moring, copied to Marla Dial and Lea Ream, August 25, 2026, 5:03 p.m., with attachment titled '8.25.26 Ltr_to_Moring RE TPIA Litigation (Mt. Pleasant).pdf'; City-produced 'Request for records.pdf' and native MSG; January 14 E/F cost-estimate letters; City-supplied 'image001.png' and 'image006.png,' received February 27; City-produced phone and call-history PNGs; preserved February 2 City ZIP; June 2 AUSA email-chain PDF; April 1 and April 4 preserved OneDrive views; Microsoft Learn, 'Keyword queries and search conditions for eDiscovery,' Participants definition; official City recordings cited in the filed controls; and the sources incorporated above. The original August 25 email and exact attached PDF are retained. Y-008 and Y-010 each reproduce one page of a longer chain for the stated limited controls; the complete chains are retained. Y-025 uses proportional crops solely to make the breadcrumb, dated folder row, item count, and visible date/time legible; the complete source PDFs are retained. No sensitive report, credential, PIN, customer, or payment content is reproduced.

Folder-state source hashes. April 1 SHA-256: 5ac873fdbf8a81c1b4698c5f486398dc55efeb0f6069362514de21e99c24287d. April 4 SHA-256: 8a71f1ef866be103d750afae4b7d393c1b15b96f9cc163445d2de7ce74ff65c2.

From: "Candias Webster"

To: "Seth Bryan" <Seth.Bryan@bryanitcorp.com>

Date: 1/12/2026 1:56:26 PM

Subject: Request for records

Attachments: Texas Public Information Act Request - Search for “Kyle Moring / [redacted] / whistleblower / OSHA” (01/01/2024–12/29/2 025).eml
Texas Public Information Act Request - Walmart-related email com munications and keyword search (01/01/2024–12/29/2025).eml
Texas Public Information Act Request - Search for “Kyle Moring / [redacted] / whistleblower / OSHA” (01/01/2024–12/29/2 025) (1).eml

Headers:
From: "Candias Webster" <>
Sender: "Candias Webster" <>
To: "Seth Bryan" <Seth.Bryan@bryanitcorp.com>
Subject: Request for records
Date: Mon, 12 Jan 2026 13:56:26 -0500
MIME-Version: 1.0
Content-Type: multipart/mixed; boundary="Mark=_56825312841265658"

---

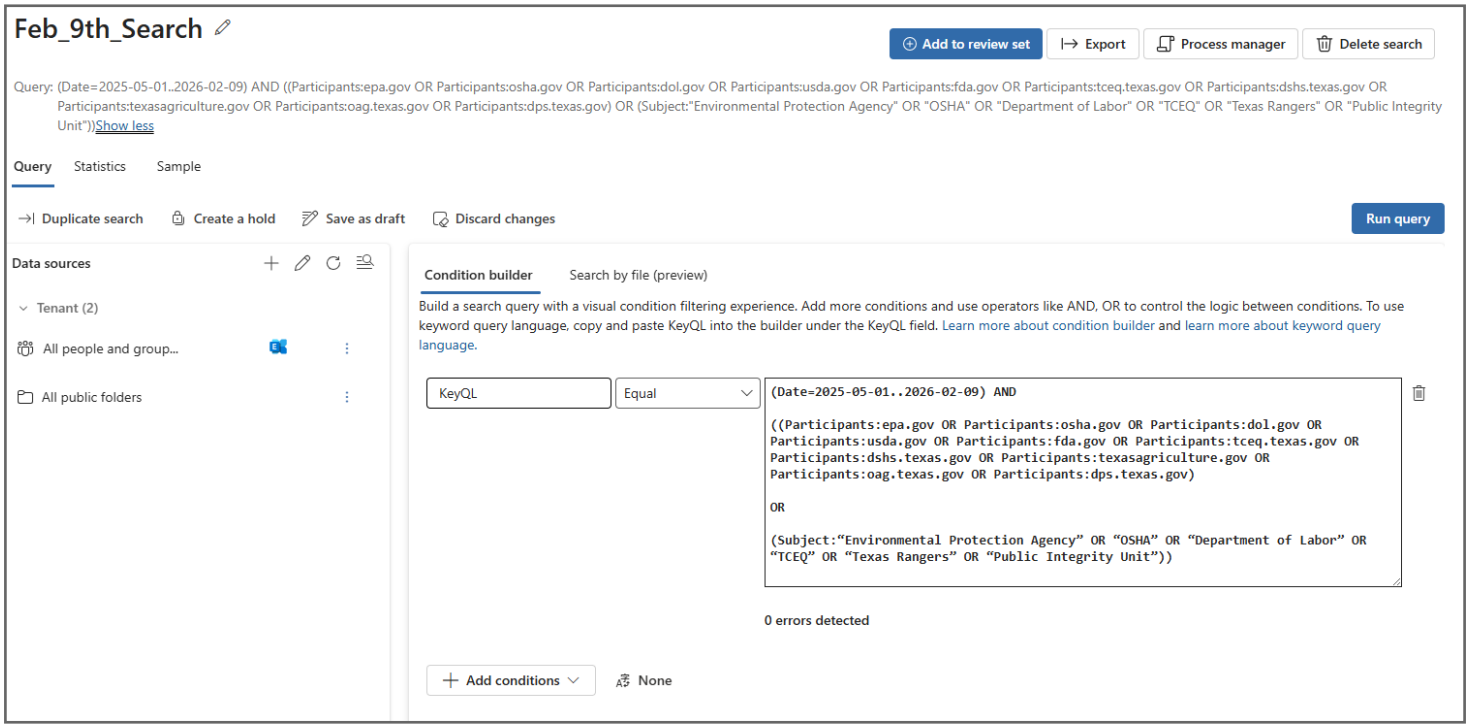
Good morning,

Can you please gather this information for me?

# FEBRUARY 27, 2026 CITY-SUPPLIED PURVIEW CONTROLS

Original PNG screenshots proportionally scaled; no substantive content altered

## 1. Saved 'Feb_9th_Search' query and selected data sources




Visible features include the saved search name, the KeyQL query, 'All people and groups,' 'All public folders,' and review-set/export controls. The image does not itself establish who configured or ran the search, whether the displayed scope was final, or which items were produced.

## 2. Review_Set_1 interface showing 12,963 items




The screenshot visibly identifies the case path 'Kyle_Moring_2026,' 'Review_Set_1,' and 12,963 items. It does not by itself establish that every item was responsive, reviewed, exported, or produced.

Source control: City-supplied image files received February 27, 2026; native PNGs retained. SHA-256 image001.png: 0cb9ae6e142c35d358d46b59d971dfe32a7a2104a8f9a1d38e9e56b22f39699f; image006.png: 3ee05fb21a2c8adf76db378503c97e7a90090f0b18ece44856530614c05c4a2b.

**From:** Candias Webster
**To:** Kent Richardson; Austin Beck
**Subject:** RE: PIA Complaint - Kyle Moring
**Date:** Tuesday, May 12, 2026 7:25:00 AM
**Attachments:** IMG_0487.PNG
image001.png
image005.png
image013.png
image014.png
image015.png
image017.png
IMG_0486.PNG
image003.png
image006.png
image007.png

---

Kent,
Here are the documents from the phone.

**Thank you,**
**Candias Webster, TRMC, CMC**
**Assistant City Manager/ City Secretary**
**City of Mt. Pleasant**
**Office: 903-575-4000**
**Cell:** [redacted]
**Fax: 903-577-1828**

*This document/description/text may have been generated by Microsoft Copilot and edited by me*

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**From:** Kent Richardson <Kent.Richardson@oag.texas.gov>
**Sent:** Friday, May 8, 2026 11:12 AM
**To:** Candias Webster <cwebster@mtpleasanttx.gov>; Austin Beck <abeck@dtrglaw.com>
**Subject:** RE: PIA Complaint - Kyle Moring

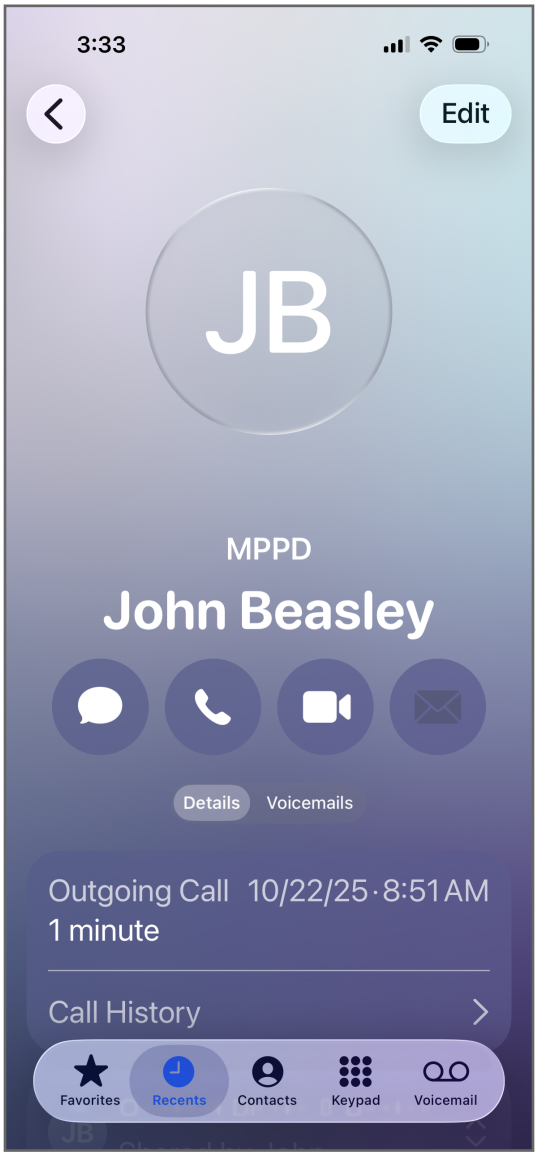
Report This Email

Candias,

# JUNE 2, 2026 CITY-PRODUCED PHONE CALL-HISTORY CONTROLS

Original PNGs proportionally scaled; contact telephone numbers are not displayed

**IMG_0486.PNG - John Beasley**




**IMG_0487.PNG - Carrie Mahon**




**Record-type comparison.** The images show outgoing calls on October 22, 2025, to John Beasley at 8:51 a.m. for one minute and Carrie Mahon at 8:48 a.m. for two minutes - the same two entries Webster transcribed on December 17. W-008 reproduces the OAG inquiry whether the City transcribed call-log data instead of producing the actual records and Webster's answer that Petitioner did not receive screenshots. Neither image displays a telephone number. They are individual Phone/Recents call-detail views, not complete call histories, voicemail logs, text threads, or carrier-generated records.

**Production-history control.** Embedded PNG timestamps report creation on May 11, 2026, at 15:33:09 and 15:33:21, without a stated timezone. Petitioner does not contend these precise PNG files existed in December. Y-008 shows Webster transmitting both to Kent Richardson of OAG's Criminal Prosecutions Division on May 12 as 'documents from the phone.' Petitioner first received them through the City's June 2 response to the May 27 OAG-record request. That five-file ZIP contained these two PNGs, two PDF-rendered email chains, and one XLSX request list. Although the request expressly sought each certification form, no certification form or embedded certification file/image appears in the ZIP. Five City certifications were later produced by OAG on July 2 and are already filed as R-2 through R-6. This states bounded contents and chronology, not intent.

SHA-256: IMG_0486.PNG - 137d00ee08982712ba5ca527e9aee9b6eca1644ce9ada4b06eae4fadba132d7c; IMG_0487.PNG - 2d4076be81fd7cbbae923d43ab234f3c80f7359e9f176c412d115e7a487022f6; June 2 production ZIP - 869a313d9b98404646a37ff3c626caf216f6c445417d90be2316f2e86485cad8.

**From:** **Richards, Lauren (USATXE)** Lauren.Richards@usdoj.gov
**Subject:** RE: [EXTERNAL] Notice of Potential Unauthorized Disclosure of Local Report Referencing [redacted]
**Date:** June 2, 2026 at 2:03 PM
**To:** Kyle Moring [redacted]

Good afternoon Mr. Moring,

Thank you for the notification. Our office's request would be that you delete the referenced record and provide written confirmation that they have been deleted and not copied or forwarded. There is no necessity in you sending me the actual document as I am already in possession of this material via law enforcement.

Let me know if you have any questions. Thank you,

**Lauren Richards**
Assistant United States Attorney
Project Safe Childhood Coordinator
Human Trafficking Coordinator
Eastern District of Texas, Texarkana Division
Office: 903-792-8453
Lauren.Richards@usdoj.gov

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**From:** Kyle Moring <[redacted]>
**Sent:** Thursday, May 28, 2026 3:57 PM
**To:** Richards, Lauren (USATXE) <Lauren.Richards@usdoj.gov>
**Subject:** [EXTERNAL] Notice of Potential Unauthorized Disclosure of Local Report Referencing [redacted]

Ms. Richards,

I am providing this notice because you are listed as counsel for the United States in [redacted], Eastern District of Texas.

I am not attaching or reproducing the record at issue because it appears to contain sensitive law enforcement, criminal justice, personally identifying, vehicle, minor or involved person, tactical, and federal case information.

On May 21, 2026, the City of Mount Pleasant, Texas produced records to me through a TPIA/SharePoint production folder. In that production, I located a file titled **Undeliverable MPPD case report 25-15902.msg**. The outer file appears to be an Exchange non-delivery report wrapper. The embedded original email appears to be from Lieutenant Mark Miller <**mmiller@mpcity.org**> to **adriancastillo@dps.texas.gov**, sent October 27, 2025, at approximately 18:25 UTC, with the subject line "**MPPD case report 25-15902**".

The embedded original email included an attachment titled **printReport.php.pdf,** which appears to be an unredacted Mount Pleasant Police Department report packet. Based on my review, the report appears to reference the federal matter identified above and contains sensitive law enforcement and personally identifying information.

The City's outside counsel, Austin Beck of Davidson Troilo Ream & Garza, P.C., has since acknowledged in writing that confidential information was inadvertently released to me through the open records process.

I am notifying your office because the released record appears to concern a federal criminal matter and may affect

DAVIDSON
TROILO
REAM
GARZA PC
ATTORNEYS AT LAW

Austin R. Beck
210.349.6484
abeck@dtrglaw.com

**August 25, 2026**

**Mr. Kyle Moring**
Petitioner, *pro se*

*Sent Via Email:* [redacted]

[redacted]

Re: **Cause No. 44437**
**Follow-Up Matters Related to August 10 Hearing**

Dear Mr. Moring,

As a follow-up to the August 10 hearing before Judge Parish, you provided us with three documents on August 11: 1) a "Focused Conferral Submission" related to your Exhibits C, E, F, G, and I (4 pages); 2) the "Complete Written Requests" referencing what you infer to be the original TPIA requests to the City, underlying Exhibits C, E, F, G, and I (10 pages); and 3) the "Proposed Search Protocols" you have suggested related to each of the five above-listed exhibits (13 pages).

First, we would like to thank you for your patience as we have studied the documents you provided. While the City has complied with the TPIA in responding to your TPIA requests, we have continued to address the concerns you have raised.

Second, we do not believe that your "conferral submissions" of August 11 align with the judge's order to submit a concise, enumerated list of documents that you contend the City has *refused* to provide in response to any of your TPIA requests. Nevertheless, we are continuing in good faith to work with you on the issues identified, and we are sharing with you the status and results of those efforts in hopes of narrowing the scope of the matters at issue before Judge Parish.

Please find our enumerated list and timelines below.

**Item 1:**

| **Date of Request** *(Per August 11 conferral)* | **Petitioner's Exhibit C** | **Status of Responsive Documents** |
|---|---|---|
| **December 4, 2025** | Temporary Custodian Records (Police Chief Mark Buhman's personal phone call history) related to MPPD Case 25-17553 *(criminal trespass warning from Walmart issued to Petitioner)* | City provided responsive documents **November 3-13, 2025** |

**Timeline of Request at Issue:**

- **October 22, 2025** – Petitioner received criminal trespass warning from Walmart Store #131 (MPPD Case 25-17553).

- **October 23** – Petitioner submitted an ORR to Mount Pleasant Police Department for records related to the above-listed case.

- **October 27** – Police Chief provided text messages between himself, Walmart supervisor Carrie Mahon and Sgt. John Beasley related to request for, and execution of, criminal trespass warning.

- **November 3** – Mount Pleasant Police Department provided its call-for-service log, vehicle-camera and body-camera footage for Sgt. Beasley and Officer Torres, and a copy of the October 22 criminal trespass warning to Petitioner. MPPD further advised that its radio recordings and screen shot images from Chief Buhman's cell phone would be placed a CD, with a charge of $1, and **the Department had no other responsive records**.

- **November 3** – Petitioner sent an "addendum" to his prior requests on this issue, seeking additional text messages, voicemails and emails, phone records and call logs from October 15-November 3, 2025, the CAD event file for the criminal trespass call, and any after-action/supervisory materials.

- **November 12** – Petitioner sent an additional request "to ensure a complete compliant production under Gov't Code ch. 552" concerning this request. MPPD requested City Attorney assistance with response.

- **November 13** – After verifying that no other identified officers had other contact with Walmart employees or Petitioner via text or email concerning the criminal trespass warning, City Attorney Austin Beck responded: "Mr. Moring: **All responsive information has been provided to you by the City regarding this request, and it is therefore closed."**

- **December 3** – Petitioner submitted a follow-up to his "supplemental clarification to my October 29, 2025 TPIA request," seeking an update on status.

- **December 4 –** Petitioner renewed TPIA request as shown per Exhibit C.

The responsive documents, other than radio recordings, that were provided to Petitioner in November 2025 are re-attached as **Exhibits C-2 and C-3** to this letter.

**Item 2:**

| **Date of Request** *(Per August 11 conferral)* | **Petitioner's Exhibit E** | **Status of Responsive Documents** |
|---|---|---|
| **December 30, 2025** | Keyword search of City documents for "Kyle Moring/ [redacted] whistleblower / OSHA", January 1, 2024-December 29, 2025 | City provided responsive documents **February 2, 2026** *Additional screenshots enclosed hereto* |

**Timeline of Request at Issue:**

- **December 30, 2025** – Petitioner submitted PIA request for "existing public information maintained by the City of Mount Pleasant, Texas (including all departments) and the Mount Pleasant Police Department) for the date range January 1, 2024-December 30, 2025 (inclusive). The request sought documents containing identified keywords in the subject line, message body, and/or attachments):
  - "Kyle Moring", "Moring", "Kyle Morning", "Mr. Morning";
  - [redacted];
  - "whistleblower" and ("whistle blower, if searchable);
  - "OSHA" (and "Occupational Safety and Health Administration," if searchable.

- **January 13, 2026** – City custodians found 6,316 possible matches in 290 of the 910 electronic locations searched.

- **January 14, 2026** – A $99 cost estimate was generated and accepted by Petitioner.

- **February 2, 2026** – Responsive documents were provided via OneDrive link to Petitioner.

Screenshots of the search terms used, and resulting data logs are attached as **Exhibits E-3** and **E-4** to this letter. Screenshots of resulting data logs, including custodians of responsive records, are attached as **Exhibits E-2 and E-5** to this letter. The City has no further responsive documents to provide at this time.

**Item 3:**

| **Date of Request** *(Per August 11 conferral)* | **Petitioner's Exhibit F** | **Status of Responsive Documents** |
|---|---|---|
| **December 30, 2025** | Keyword search of City documents for Walmart-related emails, based on domain names and specific keywords in the subject line, body and/or attachments - January 1, 2024-December 29, 2025 | City provided responsive documents **February 2, 2026** *Additional screenshots enclosed hereto* |

**Timeline of Request at Issue:**

- **December 30, 2025** - Petitioner submitted PIA request for "existing public information maintained by the City of Mount Pleasant, Texas (including all departments) and the Mount Pleasant Police Department (MPPD) for the date range January 1, 2024-December 29, 2025 (inclusive). The request sought documents containing identified keywords in the subject line, message body, and/or attachments:
  - @walmart.com;
  - @walm-mart.com;
  - Walmart Store #131;
  - Walmart Store 131;
  - Walmart #131;
  - Store #131 (when used in connection with Walmart);
  - "Wal-mart" / "Wal-Mart" / "Wal Mart"
  - "Walmart"
  - "Walmart Supercenter" / "Walmart Super Center"

- **January 13, 2026** – City custodians found 5,991 possible matches in 174 of the 984 electronic locations searched.

- **January 14** – A $54 cost estimate was generated and accepted by Petitioner. However, Petitioner also asked City to provide information about specific search queries used, where it searched, custodians, departments or email addresses searched, breakdowns of time spent, and information about who performed and/or supervised the search. The City Attorney determined that the City is not required to respond to such questions under ch. 552.

- **February 2** – Responsive documents were provided via OneDrive link to Petitioner.

Screenshots of the search terms used and resulting data logs are attached as **Exhibits F-2** and **F-3** to this letter. The City has no further responsive documents to provide at this time.

**Item 4:**

| **Date of Request** *(Per August 11 conferral)* | **Petitioner's Exhibit G** | **Status of Responsive Documents** |
|---|---|---|
| **February 14, 2026** | Communications Involving City Attorney Concerning Kyle Moring and Walmart (June 1, 2025-Present) | City provided **some** responsive documents **March 10, 2026** *Additional review of attorney-client privileged material is ongoing – August 25, 2026* |

**Timeline of Request at Issue:**

- **February 14, 2026** - Petitioner submitted PIA request for "communications involving City Attorney concerning Kyle Moring and Walmart" for the date range June 1, 2025 through "the date the City conducts its search." The request specified communications between City Attorney and staff with any City/MPPD official or employee, in which the stated search terms appeared in any written communications or attachments, as well as a request for "attorney fee bills and public fund payment records related to these matters."

- **March 3** – Petitioner sent a "Deadline Notice" reminder to City regarding this request.

- **March 6** – Petitioner sent a follow-up to his March 3 reminder, requesting a response by 5 p.m. on March 9. City Attorney Austin Beck replied to say that the City was still gathering responsive records, and anticipated a reply by the end of the week.

- **March 10** – City provided emails gathered relative to one aspect (non-privileged communications) of Petitioner's request.

- **March 16** – Responsive documents subject to attorney-client privileged sent to City Attorney offices for privilege review.

- **March 22** – Petitioner sent another follow-up to his requested, advised that a complaint had been filed with Office of the Attorney-General.

- **March 27** – Petitioner sent another follow-up, requesting response by close of business on March 30 and advising that he intended to supplement his complaint to the OAG.

- **April 7** – Petitioner following up on this request.

- **April 13** – Petitioner following up on this request.

At this time, the City has identified 344 separate emails that are potentially responsive to this request, and a privilege review is still under way by the City Attorney's office. While we believe the responsive information has been previously released, a second review has commenced that could result in minor additional production.

**Item 5:**

| **Date of Request** *(Per August 11 conferral)* | **Petitioner's Exhibit I** | **Status of Responsive Documents** |
|---|---|---|
| **February 8, 2026** | Regulatory Agency Correspondence with City - May 1, 2025-Present | City provided rolling production of responsive documents **March 27, 2026** **April 1, 2026** **April 21, 2026** |

**<u>Timeline of Request at Issue</u>:**

- **February 8, 2026** - Petitioner submitted PIA request for "all written or electronic correspondence, communications, records, and documents (including emails, letters, text messages, notices, reports, memoranda, and attachments) between any officer, employee, elected official, appointed official, department head, or agent of the City of Mount Pleasant ("City") and any state or federal regulatory, enforcement, or investigative agency, for the period from May 01, 2025 through the date the City conducts its search for responsive records." Specified agencies included:
    - U.S. Environmental Protection Agency (EPA), including EPA Region 6;
    - U.S. Occupational Safety and Health Administration (OSHA);
    - U.S. Department of Labor (DOL);
    - U.S. Department of Agriculture (USDA);
    - U.S. Food and Drug Administration (FDA);
    - Texas Commission on Environmental Quality (TCEQ), including the Environmental Crimes Unit;
    - Texas Department of State Health Services (DSHS);
    - Texas Department of Agriculture (TDA);
    - Office of the Texas Attorney General (OAG), including the Open Records Division;
    - Texas Department of Public Safety (DPS), including the Texas Rangers and Public Integrity Unit; and
    - All City departments, including but not limited to the City Manager's Office, City Attorney's Office, City Secretary's Office, Police Department, Fire Department, Public Works Department, Utilities Department, Wastewater Department, Code Enforcement, Building Inspections, Planning and Zoning, Finance Department, Human Resources, and "any other City department or division."

- **February 23** – City provided a $234 cost estimate. Petitioner accepted the charge, noting his right to challenge any amounts exceeding that number.
- **February 27** – Petitioner submitted questions about the City's estimated 13 hours of staff time associated with this request; specified additional request for a complete copy of the text query to be run (not a screenshot), other details.
- **March 17** – Petitioner sent a follow-up on this request; City Secretary responded to say that she was "still going through the over 12,000 emails that were populated from this search."
- **March 17** – Petitioner thanked City Secretary for response but noted several issues were still unresolved, including a request for "the date and hour when responsive information will be made available," among other subpoints raised.
- **March 23** – Petitioner sent follow-up correspondence, seeking confirmation that his payment for responsive records had been processed.
- **March 24** – City Secretary responded to note that City was still working through the emails generated by the requested search, and would provide a link with a large number of documents for Petitioner's review by the end of the week. A receipt for his payment was provided.
- **March 27** – Partial production provided to Petitioner via OneDrive link.
- **March 31** – Petitioner communicated dissatisfaction with first tranche of production, stating that it "appears materially overinclusive and likely incomplete." Revised parameters of request, seeking response by April 2.
- **April 1** – City provided additional rolling production responsive to original February 8 request.
- **April 7** – Petitioner sends follow-up on February 8 request and "materially overinclusive" responses, seeks anticipated date and hour of next production.
- **April 13** - Petitioner sends follow-up on February 8 request and "materially overinclusive" responses, seeks anticipated date and hour of next production.
- **April 21** – City provided third tranche of responsive documents via OneDrive link to Petitioner.

The City has not identified any other documents that are potentially responsive to this request. The OneDrive link containing the responsive documents remains available to you, without restrictions or an expiration date.

Although we understand you were dissatisfied by the volume of responsive documents and seemingly by the content of those documents, the City cannot assume the responsibility to filter the public documents deemed responsive to specified search parameters on behalf of any Requestor. We have deemed this request to be fully responded to and closed.

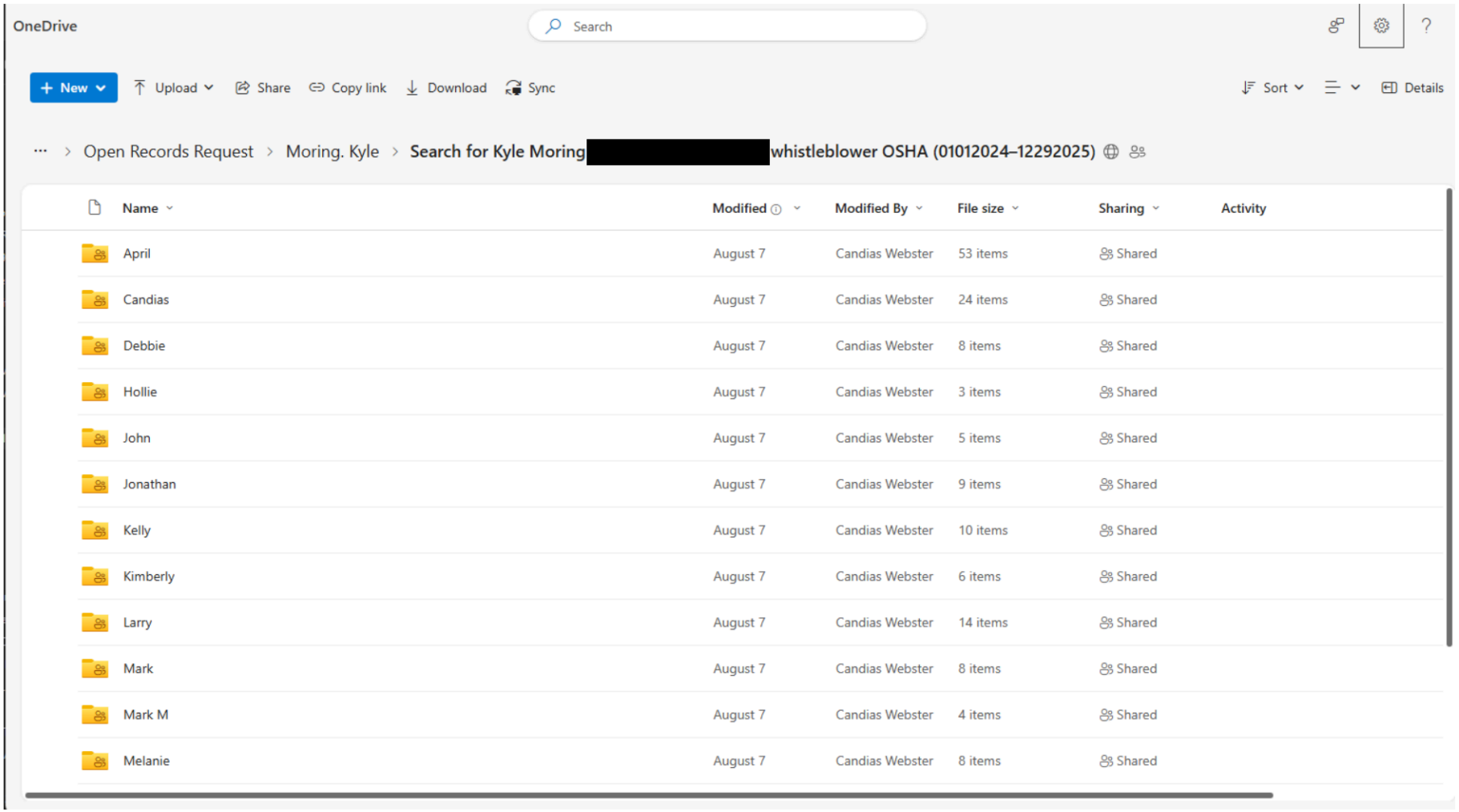
*Additional Post-Hearing Correspondence*
Finally, we are in receipt of the August 23 "Cross-Request Record-Family Reconciliation Schedule and Hearing Roadmap" that you provided in advance of filing your Third Supplemental Exhibit and Witness List.

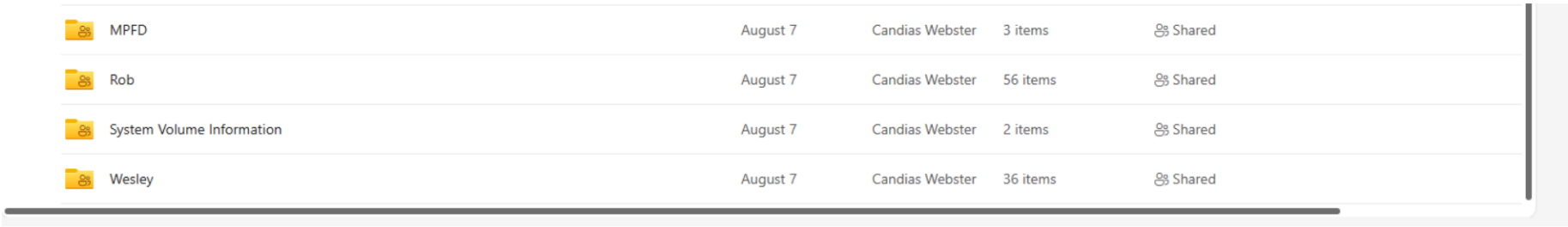
While the “ask” of this document is not entirely clear – at least insofar as it concerns the City – we would assert that the reconciliation schedule and roadmap falls outside the scope of the Court’s August 10 instructions. If, on the other hand, it is intended as some type of discovery request, please be advised that such procedures are not yet ripe at this stage of litigation. (We do understand that your pretrial witness and exhibit lists, along with their supplements, have been filed “out of an abundance of caution” and that a response is not expected at this time.)

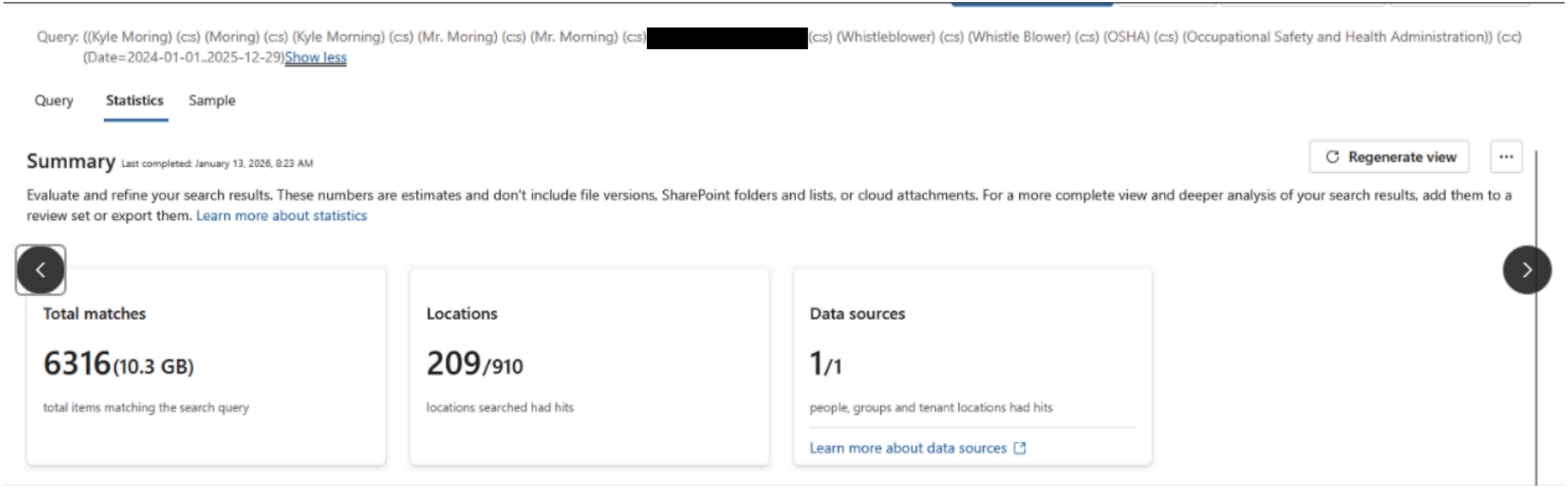
We look forward to next steps in resolving this matter.

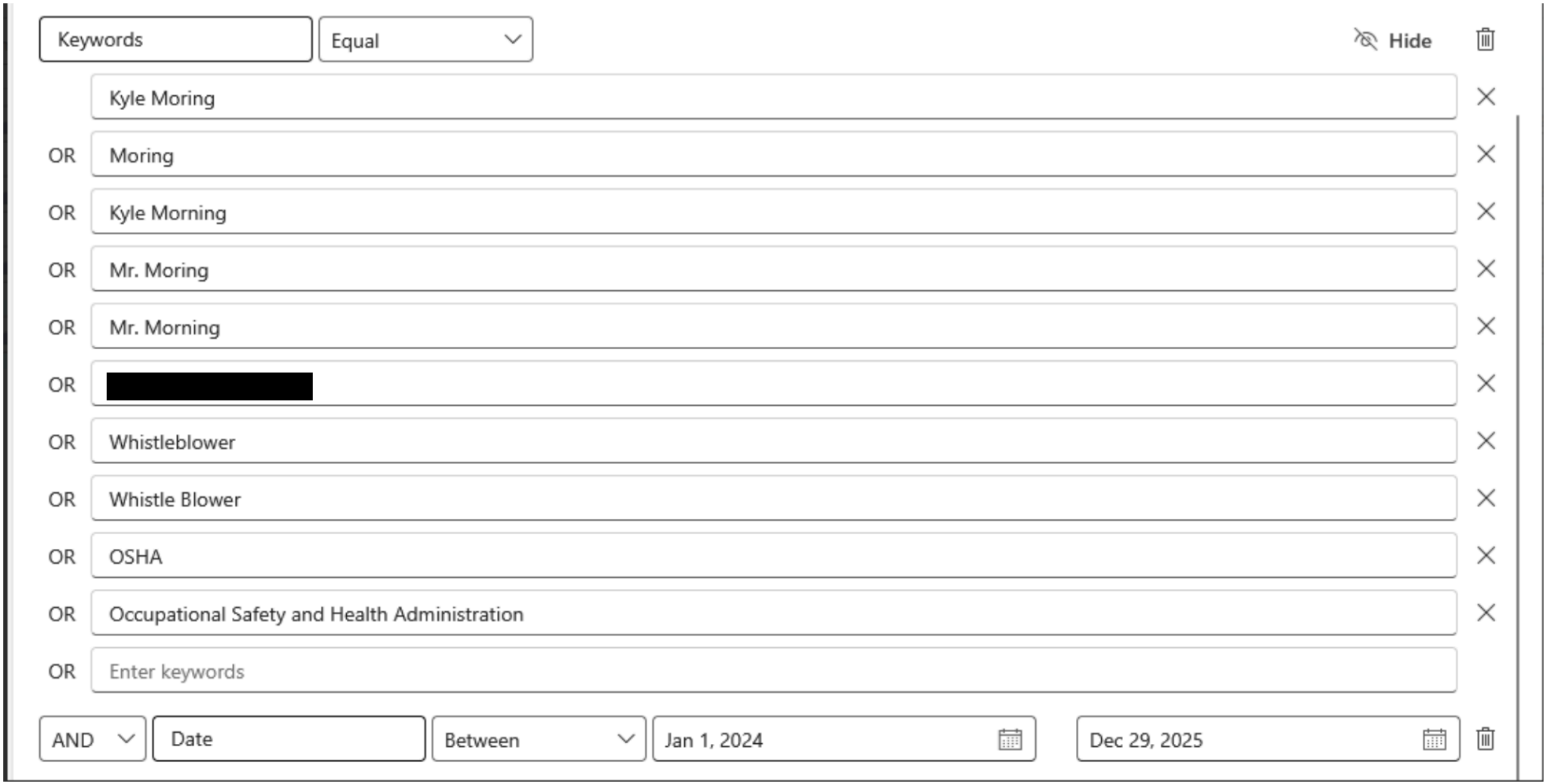
Very truly yours,

**Austin R. Beck**
*FOR THE FIRM*
*ATTORNEYS FOR THE*
*CITY OF MOUNT PLEASANT, TEXAS*


OneDrive
Search
New
Upload
Share
Copy link
Download
Sync
Sort
Details
Open Records Request
Moring. Kyle
Search for Kyle Moring [redacted] whistleblower OSHA (01012024–12292025)
Name
Modified
Modified By
File size
Sharing
Activity
April August 7 Candias Webster 53 items Shared
Candias August 7 Candias Webster 24 items Shared
Debbie August 7 Candias Webster 8 items Shared
Hollie August 7 Candias Webster 3 items Shared
John August 7 Candias Webster 5 items Shared
Jonathan August 7 Candias Webster 9 items Shared
Kelly August 7 Candias Webster 10 items Shared
Kimberly August 7 Candias Webster 6 items Shared
Larry August 7 Candias Webster 14 items Shared
Mark August 7 Candias Webster 8 items Shared
Mark M August 7 Candias Webster 4 items Shared
Melanie August 7 Candias Webster 8 items Shared


MPFD August 7 Candias Webster 3 items Shared
Rob August 7 Candias Webster 56 items Shared
System Volume Information August 7 Candias Webster 2 items Shared
Wesley August 7 Candias Webster 36 items Shared


Query: ((Kyle Moring) (c:s) (Moring) (c:s) (Kyle Morning) (c:s) (Mr. Moring) (c:s) (Mr. Morning) (c:s) [redacted] (c:s) (Whistleblower) (c:s) (Whistle Blower) (c:s) (OSHA) (c:s) (Occupational Safety and Health Administration)) (c:c) (Date=2024-01-01..2025-12-29)Show less
Query
Statistics
Sample
Summary Last completed: January 13, 2026, 8:23 AM
Regenerate view
Evaluate and refine your search results. These numbers are estimates and don't include file versions, SharePoint folders and lists, or cloud attachments. For a more complete view and deeper analysis of your search results, add them to a review set or export them. Learn more about statistics
Total matches
6316 (10.3 GB)
total items matching the search query
Locations
209/910
locations searched had hits
Data sources
1/1
people, groups and tenant locations had hits
Learn more about data sources


Keywords
Equal
Hide
Kyle Moring
OR
Moring
OR
Kyle Morning
OR
Mr. Moring
OR
Mr. Morning
OR
[redacted]
OR
Whistleblower
OR
Whistle Blower
OR
OSHA
OR
Occupational Safety and Health Administration
OR
Enter keywords
AND
Date
Between
Jan 1, 2024
Dec 29, 2025

Query: kind:email AND ((sent>=2024-01-01 AND sent<=2025-12-30) OR (received>=2024-01-01 AND received<=2025-12-30)) AND [redacted] OR [redacted] OR "Kyle Moring" OR Moring OR "Kyle Morning" OR "Mr Moring" OR "Mr Morning" OR whistleblower OR "whistle blower" OR OSHA OR "Occupational Safety and Health Administration")Show less

Query | **Statistics** | Sample

## Summary

Last completed: August 13, 2026, 16:08 PM

Regenerate view

Evaluate and refine your search results. These numbers are estimates and don't include file versions, SharePoint folders and lists, or cloud attachments. For a more complete view and deeper analysis of your search results, add them to a review set or export them. Learn more about statistics

**Total matches**

**5991** (8.9 GB)

total items matching the search query

**Locations**

**174**/984

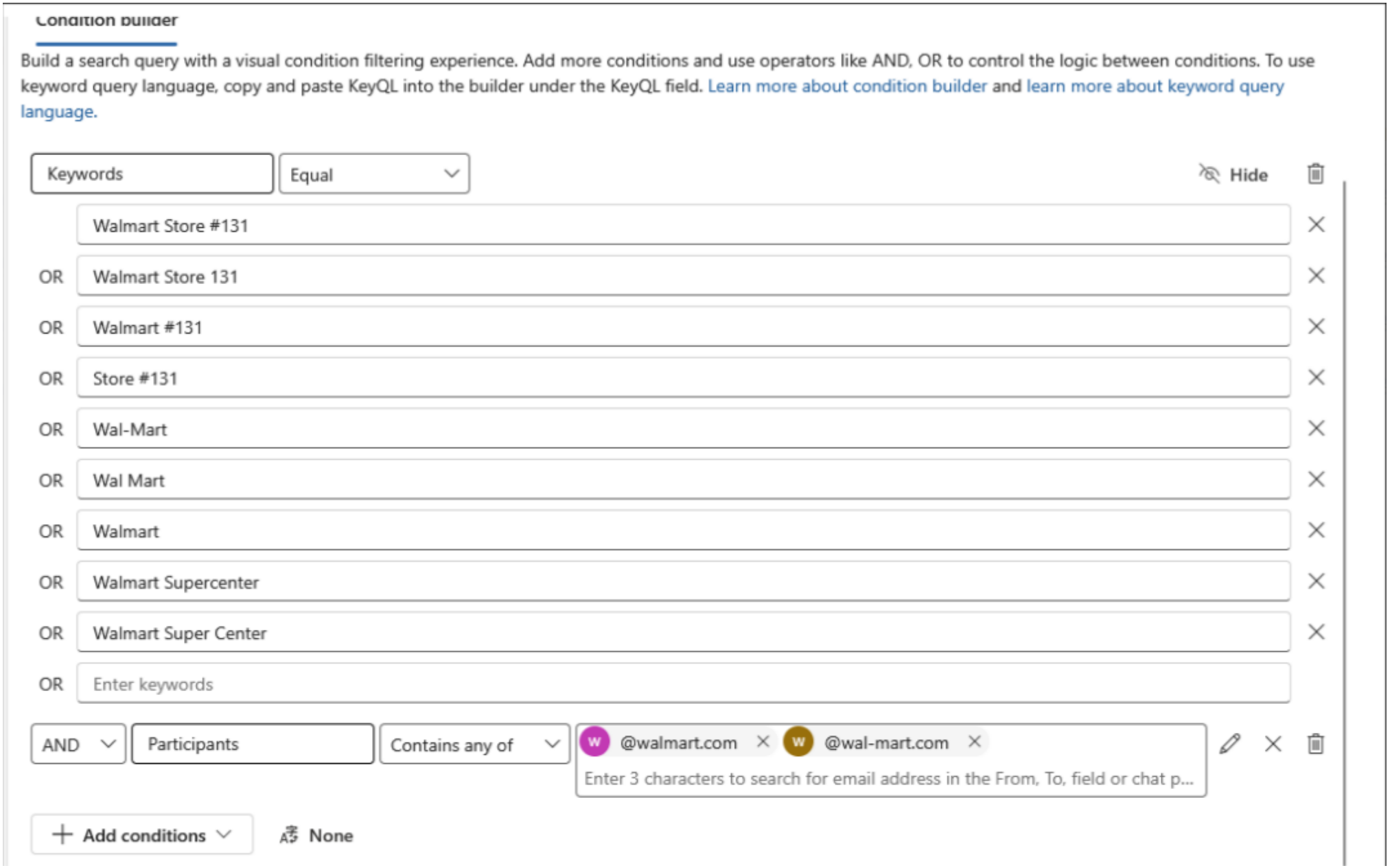
locations searched had hits

**Data sources**

**1**/1

people, groups and tenant locations had hits

Learn more about data sources


Condition Builder
Build a search query with a visual condition filtering experience. Add more conditions and use operators like AND, OR to control the logic between conditions. To use keyword query language, copy and paste KeyQL into the builder under the KeyQL field. Learn more about condition builder and learn more about keyword query language.
Keywords
Equal
Hide
Walmart Store #131
OR
Walmart Store 131
OR
Walmart #131
OR
Store #131
OR
Wal-Mart
OR
Wal Mart
OR
Walmart
OR
Walmart Supercenter
OR
Walmart Super Center
OR
Enter keywords
AND
Participants
Contains any of
@walmart.com
@wal-mart.com
Enter 3 characters to search for email address in the From, To, field or chat p...
Add conditions
None

Query: kind:email AND ((sent>=2024-01-01 AND sent<=2025-12-30) OR (received>=2024-01-01 AND received<=2025-12-30)) AND [redacted] OR [redacted] OR "Kyle Moring" OR Moring OR "Kyle Morning" OR "Mr Moring" OR "Mr Morning" OR whistleblower OR "whistle blower" OR OSHA OR "Occupational Safety and Health Administration")Show less

Query | **Statistics** | Sample

## Summary

Last completed: August 13, 2026, 16:08 PM

Regenerate view

Evaluate and refine your search results. These numbers are estimates and don't include file versions, SharePoint folders and lists, or cloud attachments. For a more complete view and deeper analysis of your search results, add them to a review set or export them. Learn more about statistics

**Total matches**

**5991** (8.9 GB)

total items matching the search query

**Locations**

**174**/984

locations searched had hits

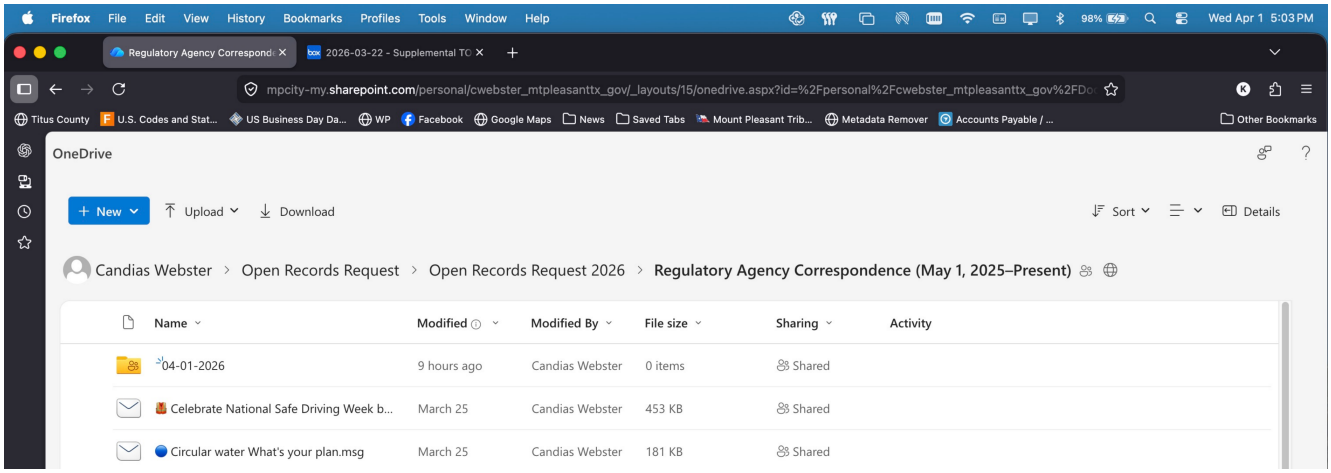
**Data sources**

**1**/1

people, groups and tenant locations had hits

Learn more about data sources

# PRESERVED SHARED-FOLDER STATE - APRIL 1 AND APRIL 4, 2026




April 1, 2026, 5:03 p.m. displayed view. The shared root is 'Regulatory Agency Correspondence (May 1, 2025-Present).' The dated '04-01-2026' subfolder displays '0 items'; earlier March 25 material remains visible in the root. The displayed computer clock-not the later PDF-wrapper creation date-is the basis for the stated observation time.




April 4, 2026, 6:46 a.m. printed view. The same dated subfolder still displays '0 items' and 'Modified Wednesday at 6:02.'

Limited inference. These captures do not prove that the shared root was empty, that no record was uploaded elsewhere or temporarily, or that no later production occurred. They show only that the specifically dated '04-01-2026' subfolder displayed zero items at both observed times. That directory state does not facially correspond with the August 25 letter's statement that the City 'provided additional rolling production' on April 1 and is presented for reconciliation and explanation.

Source control. Proportional crops retain the breadcrumb, dated folder row, item count, and visible date/time; no substantive content is altered. Complete source PDFs are retained. April 1 SHA-256: 5ac873fdbf8a81c1b4698c5f486398dc55efeb0f6069362514de21e99c24287d. April 4 SHA-256: 8a71f1ef866be103d750afae4b7d393c1b15b96f9cc163445d2de7ce74ff65c2.

# PROPOSED EXHIBIT Y - LINK-STATUS CONTROL

**Representative, sanitized Item I SharePoint captures**

## Purpose

Respondent's August 25 letter states that the OneDrive link containing responsive Item I documents remains available without restrictions or an expiration date. Later that evening, Petitioner tested the exact links contained in the City's March 27, April 21, and May 21 Item I transmittals. Each displayed the Microsoft message "This link has been removed." Earlier preserved captures show the same message for the May 21 link on May 28 and June 10 and for the March 27 link on August 3. On May 28, Petitioner notified the City and Council at 8:04 a.m. and Bailey, copying Richardson, at 8:14 a.m.; the first preserved Link A failure was observed later that day. Petitioner's DOJ notice followed at 3:57 p.m. Petitioner received no notice from Bailey or Richardson of corrective or investigative action addressing the disclosure or link status, but does not offer their silence to prove that no action occurred or that either had a duty to act. These pages are offered only as a compact current-status, notice, chronology, and reconciliation control.

## What the captures do - and do not - establish

The captures establish only that the identified links displayed the stated error when tested on the specified dates. They do not establish that any underlying record was deleted; when or why a permission or sharing condition changed; who caused a change; whether counsel knew the link status when the August 25 letter was sent; whether the links were accessible when originally transmitted; whether Petitioner had an opportunity to download the records; or whether the City had a continuing duty to maintain indefinite link access.

## Security-preserving presentation

The three links are labeled A, B, and C by the dates of the City's transmittals. Share URLs, resource identifiers, and access tokens are not reproduced. The six source pages are rasterized, proportionally cropped, and flattened. Browser URL headers and footers, active URI annotations, and source metadata are omitted from the public exhibit. The displayed Microsoft error message, correlation identifier, and page-displayed date/time remain visible. Complete unmodified captures, source metadata, transmittal records, and hashes are retained and can be supplied to Respondent or tendered in camera.

## Foundation and evidentiary limit

Petitioner may testify that he clicked the exact links in the identified City transmittals, observed the displayed pages, and contemporaneously saved or printed them. The transmittals, distinctive Microsoft pages, correlation identifiers, metadata, and preserved originals provide additional authentication characteristics under TRE 901. The pages are offered independently to show observed link status and chronology, not as a compromise admission, not for the truth of an underlying third-party allegation, and not to prove intent or bad faith. Additional captures are retained but are neither summarized nor relied upon here.

# SELECTED CAPTURE INDEX

**Only the six source captures reproduced at Y-028 through Y-033 are indexed below.**

| Y page | Link / City transmittal | Microsoft page-displayed date/time<br>timezone not shown | PDF creation / local print time | Selected purpose |
|---|---|---|---|---|
| Y-028 | Link A<br>May 21 City transmittal | 5/28/2026 9:13:51 AM | May 28, 2026, about 11:14 a.m. CDT | First preserved Link A removal capture. |
| Y-029 | Link A<br>May 21 City transmittal | 6/10/2026 3:43:17 PM | June 10, 2026, about 5:43 p.m. CDT | Latest selected contemporary persistence capture for Link A. |
| Y-030 | Link B<br>March 27 City transmittal | 8/3/2026 11:10:35 AM | August 3, 2026, about 1:10 p.m. CDT | First preserved removal capture selected for Link B. |
| Y-031 | Link A<br>May 21 City transmittal | 8/25/2026 5:14:09 PM | August 25, 2026, about 7:14 p.m. CDT | Link A recheck later the evening of Respondent's 5:03 p.m. letter. |
| Y-032 | Link B<br>March 27 City transmittal | 8/25/2026 5:15:21 PM | August 25, 2026, about 7:15 p.m. CDT | Link B recheck later the evening of Respondent's 5:03 p.m. letter. |
| Y-033 | Link C<br>April 21 City transmittal | 8/25/2026 5:15:35 PM | August 25, 2026, about 7:15 p.m. CDT | Link C recheck later the evening of Respondent's 5:03 p.m. letter. |

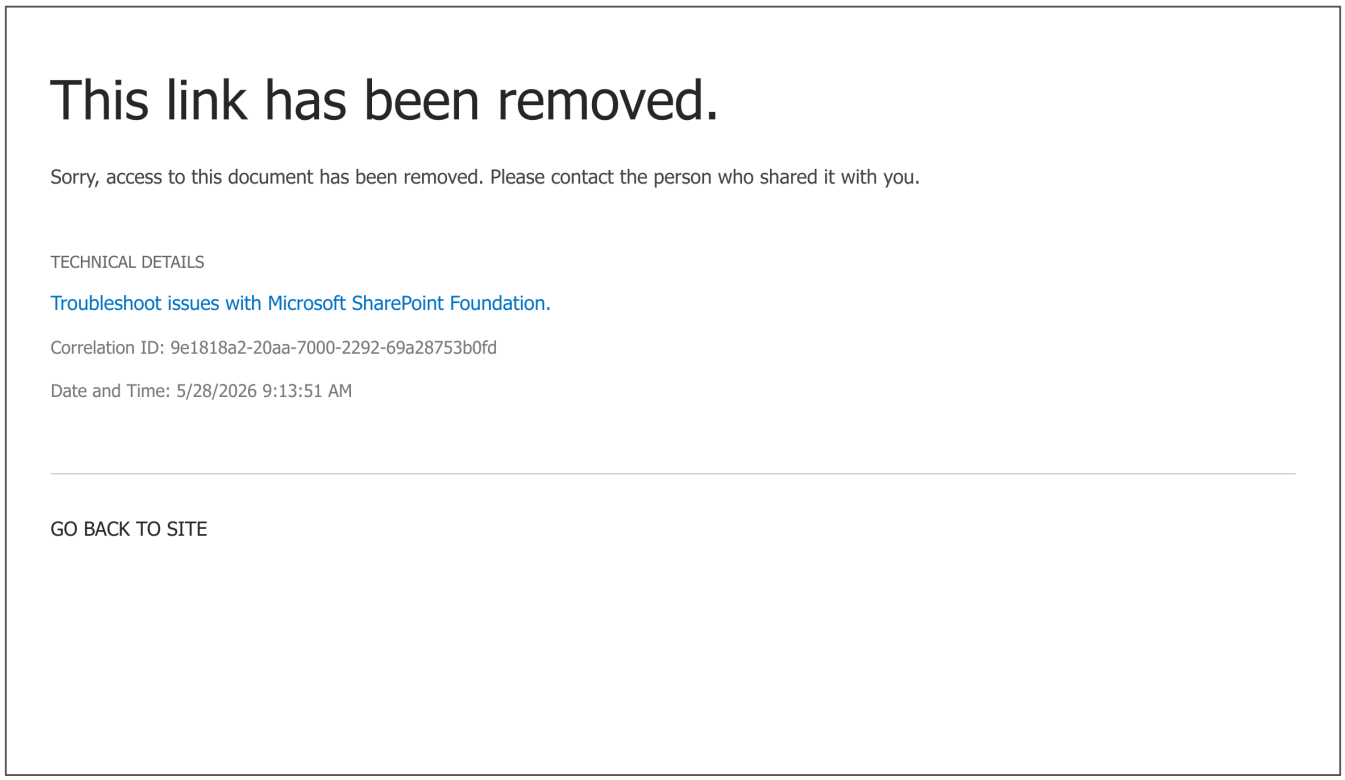
Time-control note. The Microsoft error pages do not label the displayed time zone. The separate PDF creation timestamps and visible local print footers align approximately two hours later in CDT. The August 25 source captures therefore confirm preservation later that evening; this control does not describe the Microsoft-displayed times themselves as CDT.

Link-identity note. A, B, and C are the separate links contained in the City's May 21, March 27, and April 21 transmittals, respectively. The public exhibit does not reproduce any share URL or access parameter. Each link was tested independently; no inference is offered that a change to one necessarily caused another to fail.

# SANITIZED SOURCE CAPTURE - LINK A

## Y-028 | May 21 City transmittal

| | |
|---|---|
| Microsoft page-displayed date/time | 5/28/2026 9:13:51 AM (time zone not shown) |
| PDF creation / local print time | May 28, 2026, about 11:14 a.m. CDT |
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| Source SHA-256 | 9fe55cf2b35fd32ac7d33b23a23c7b09f04ad6237322eed7d4c58ad2f8421582 |



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TECHNICAL DETAILS

Troubleshoot issues with Microsoft SharePoint Foundation.

Correlation ID: 9e1818a2-20aa-7000-2292-69a28753b0fd

Date and Time: 5/28/2026 9:13:51 AM

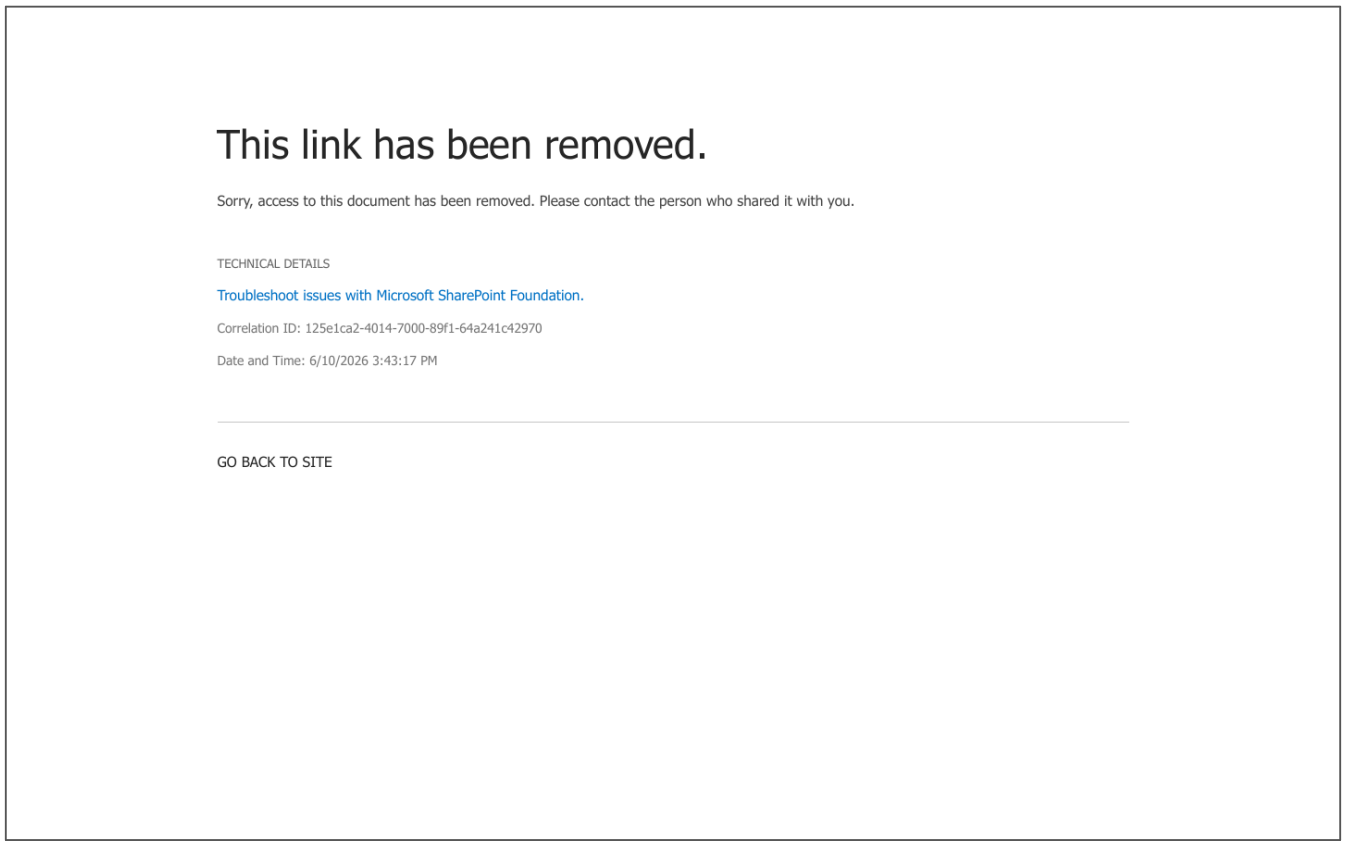
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# SANITIZED SOURCE CAPTURE - LINK A

## Y-029 | May 21 City transmittal

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|---|---|
| Microsoft page-displayed date/time | 6/10/2026 3:43:17 PM (time zone not shown) |
| PDF creation / local print time | June 10, 2026, about 5:43 p.m. CDT |
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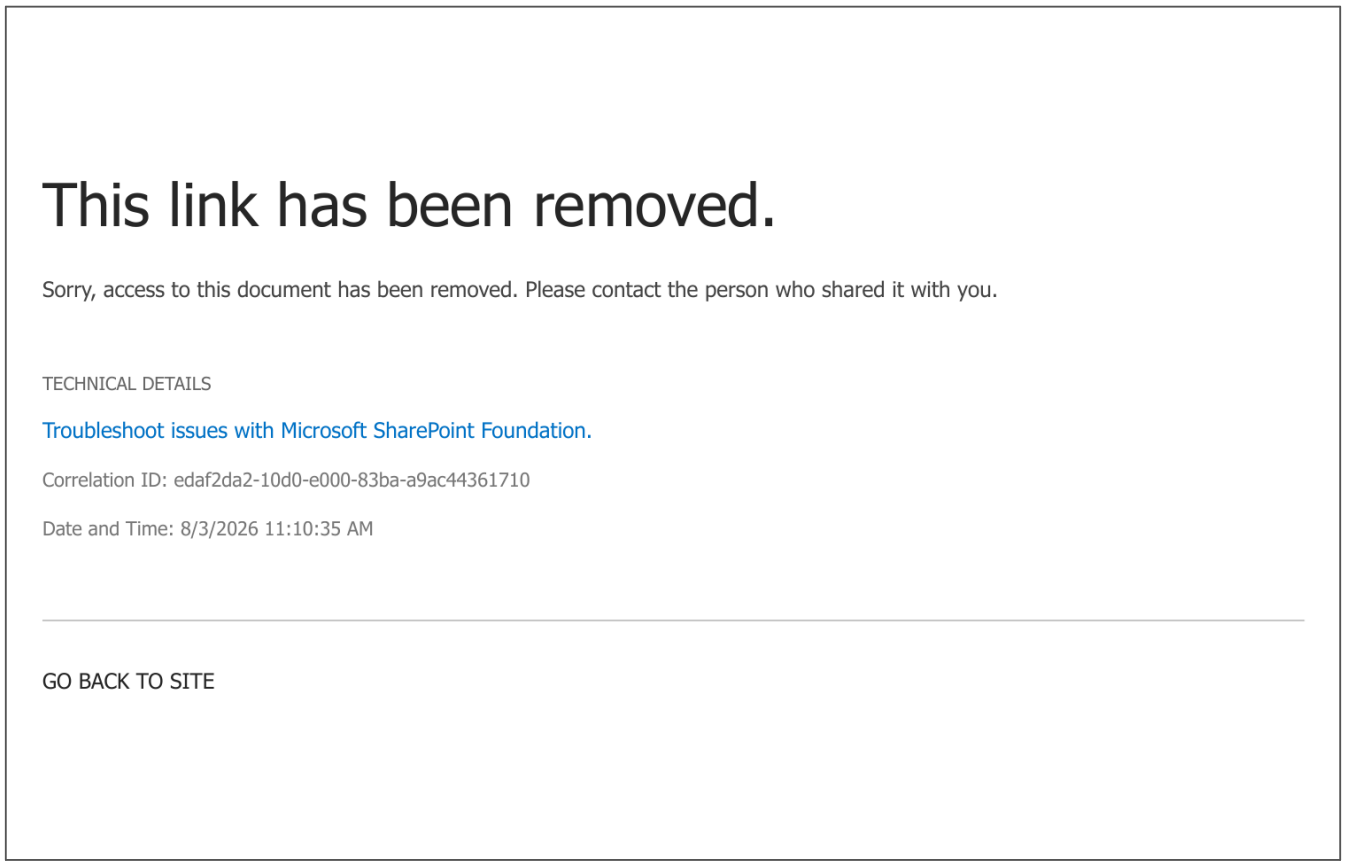



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# SANITIZED SOURCE CAPTURE - LINK B

**Y-030 | March 27 City transmittal**

| | |
|---|---|
| Microsoft page-displayed date/time | 8/3/2026 11:10:35 AM (time zone not shown) |
| PDF creation / local print time | August 3, 2026, about 1:10 p.m. CDT |
| Correlation ID | edaf2da2-10d0-e000-83ba-a9ac44361710 |
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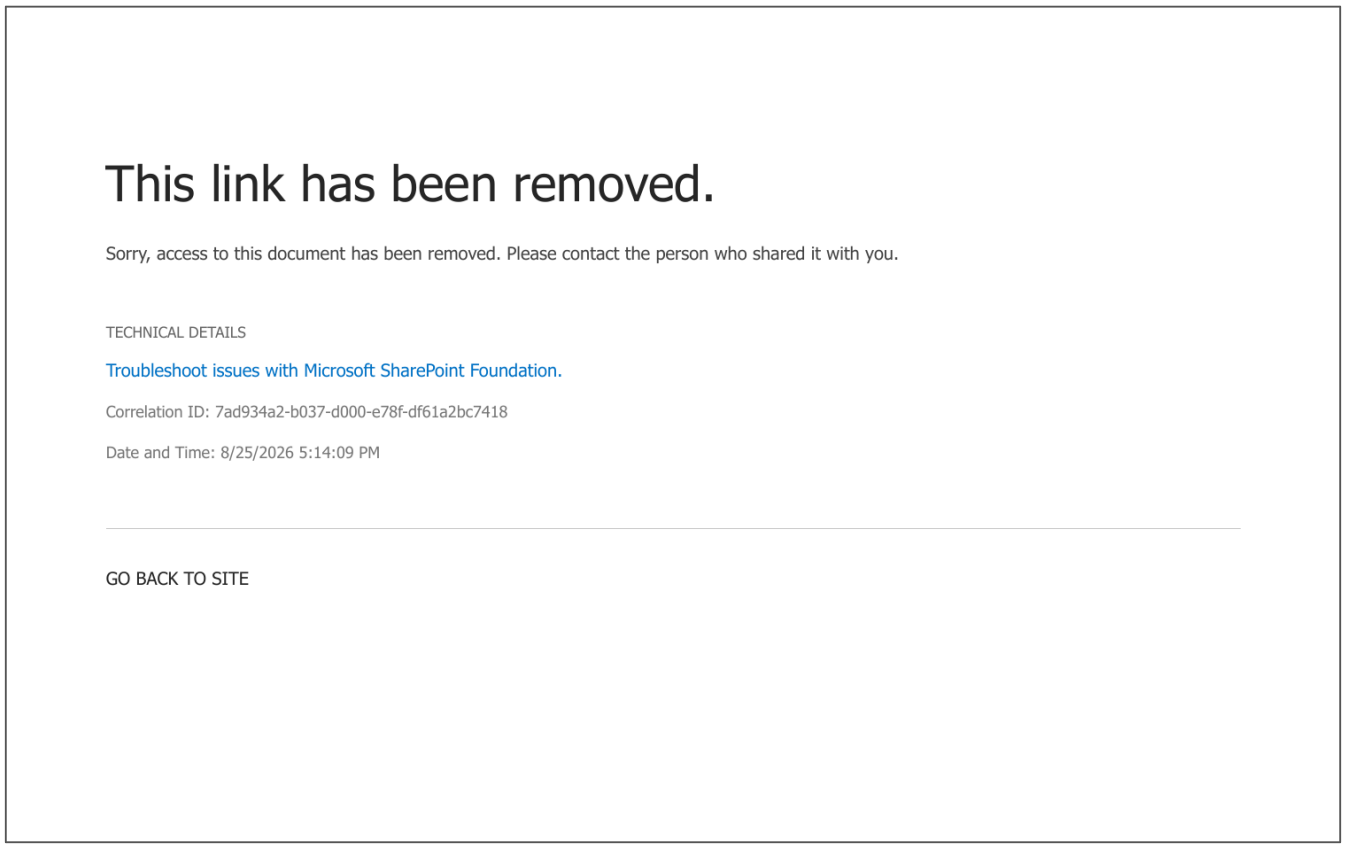



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# SANITIZED SOURCE CAPTURE - LINK A

**Y-031 | May 21 City transmittal**

| | |
|---|---|
| Microsoft page-displayed date/time | 8/25/2026 5:14:09 PM (time zone not shown) |
| PDF creation / local print time | August 25, 2026, about 7:14 p.m. CDT |
| Correlation ID | 7ad934a2-b037-d000-e78f-df61a2bc7418 |
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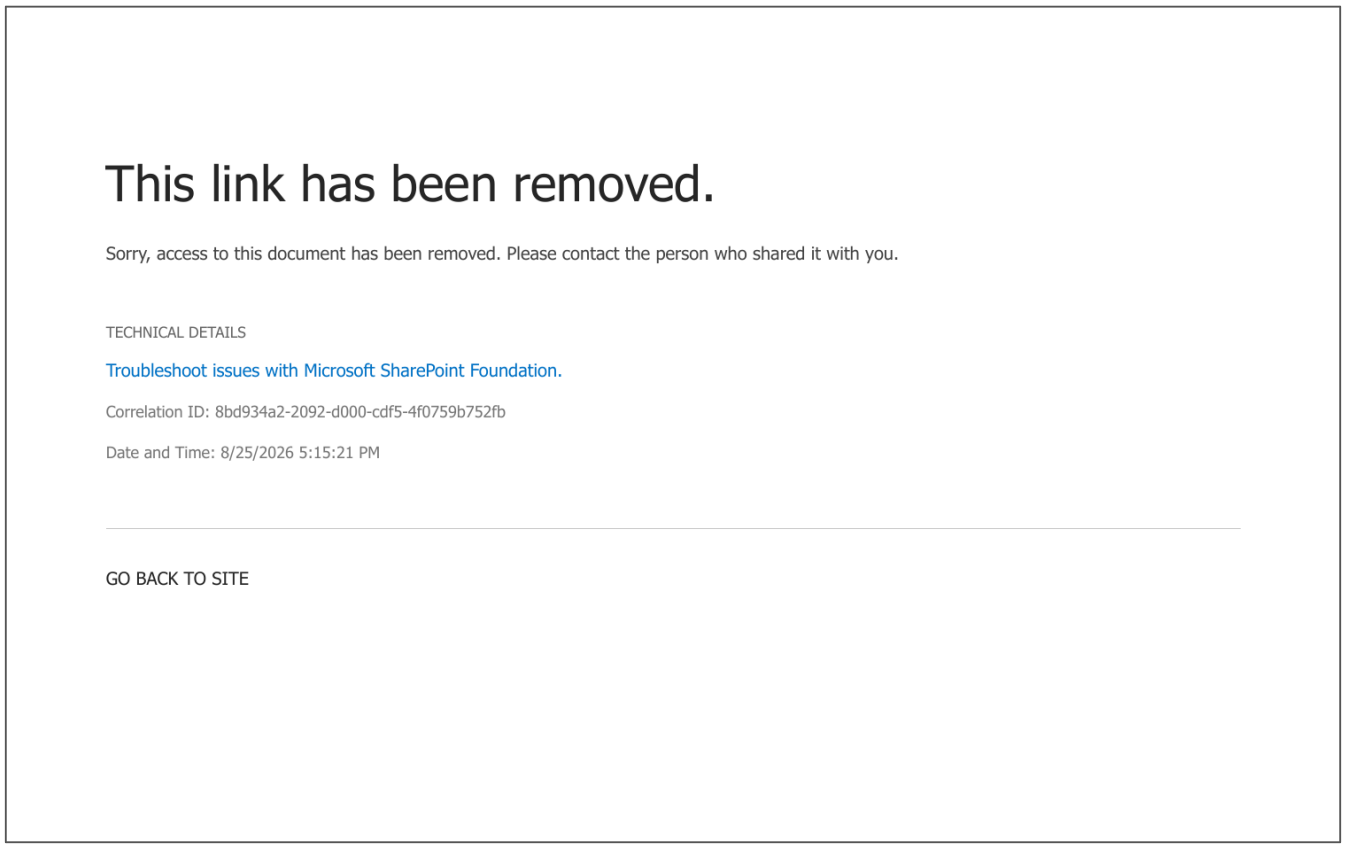



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# SANITIZED SOURCE CAPTURE - LINK B

**Y-032 | March 27 City transmittal**

| | |
|---|---|
| Microsoft page-displayed date/time | 8/25/2026 5:15:21 PM (time zone not shown) |
| PDF creation / local print time | August 25, 2026, about 7:15 p.m. CDT |
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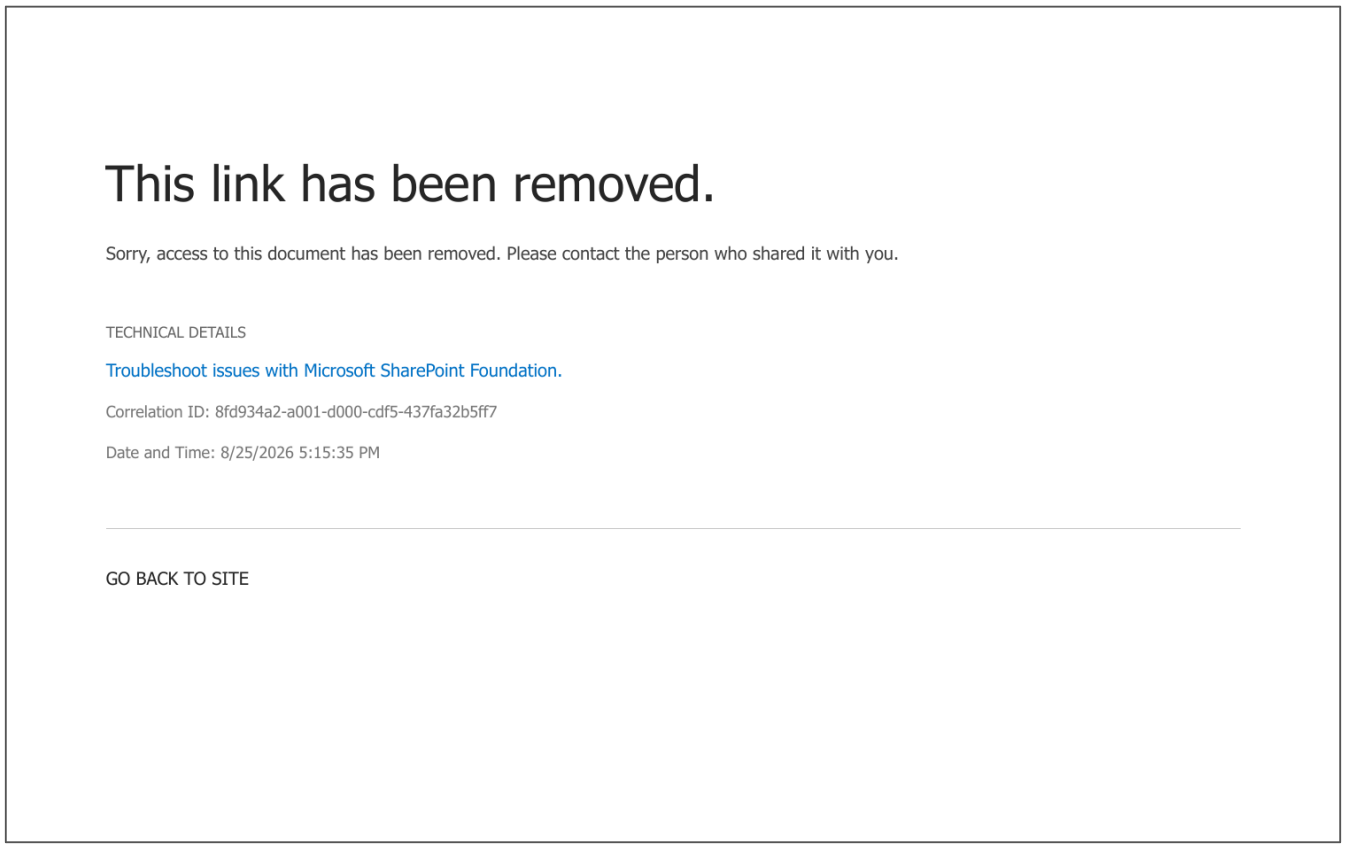



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# SANITIZED SOURCE CAPTURE - LINK C

**Y-033 | April 21 City transmittal**

| | |
|---|---|
| Microsoft page-displayed date/time | 8/25/2026 5:15:35 PM (time zone not shown) |
| PDF creation / local print time | August 25, 2026, about 7:15 p.m. CDT |
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