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August 27, 2026

Mr. Kyle Moring
Petitioner, *pro se*
[redacted]

Sent Via Email: [redacted]

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

Dear Mr. Moring,

We received your August 26 email in response to our letter concerning the scope of matters to be addressed before Judge Parish. The original letter is attached hereto as Exhibit A for ease of reference, and your response is attached as Exhibit B.

We are responding to provide clarification, to the extent possible, to the follow-up questions you raised.

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 2-13, 2025**

You correctly noted that we failed to attach the **Exhibits C-2** and **C-3** that were mentioned in our letter. This was an oversight on our part, and the attachments are provided with this transmission.

As you are aware, **Exhibit C-2** (text messages between Police Chief Mark Buhman, Walmart supervisor Carrie Mahon, and Sgt. John Beasley, related to the October 22 criminal trespass you were issued) were previously provided to you by the City and by the Office of the Attorney General on: **October 23, 2025 (via CD provided by MPPD); November 2, 2025; February 2, 2026; June 2, 2026;** and **August 26, 2026.** The same applies to **Exhibit C-3,** which are the call logs captured on Chief Buhman's personal cell phone relative to this request.

The City has no further responsive information on this TPIA request and considers it closed.

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*

You correctly noted in your email that **"**The letter reports 6,316 possible matches in 290 of 910 locations, while the supplied January 13 statistics image visibly reports 6,316 matches in 209 of 910 locations."

The "290" number mentioned in the body of the letter was a typographical error; the correct number is 209 of 910 locations, as shown in the screen shot that was provided to you.

Your letter states: "The August 13 panel reflects materially different query and date logic. Please advise whether all existing, nonduplicate messages and attachments within E's original terms have been produced."

The City uses the search terms provided in your request to run the queries. As previously noted, your requests for keyword terms including "OSHA" have been run, the cost estimates were accepted, and the responsive documents were provided to you on February 2, 2026.

The City has no additional responsive documents to provide as supplements to this request.

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*

As you stated, "The visible query appears to join the participant-domain condition to the Walmart-term condition with AND, although the request contains two independent branches. The supplied statistics image also appears to concern the August 13 Moring-related search. Please advise whether both original F branches were separately searched and reconciled and whether all existing, nonduplicate responsive records have been produced."

The screenshot of the City's search-term builder **does** have an "AND" condition -- so the search shown would populate any of those phrases if it had a Walmart e-mail associated with it. (The screenshot previously supplied to you as Exhibit F-2 is the search from January 12, 2026; it does not differ in any material aspect from additional, subsequent search results.)

With this clarification, the City has no further response on this TPIA request and considers it closed.

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*

As we stated in our August 25 letter, we identified 344 separate emails that are potentially responsive, and a privilege review was under way. You noted in your response that "[t]hat status has not been reconciled with your May 13 statement to Kent Richardson that more than 3,000 responsive pages had been identified, approximately one percent was privileged, identification and separation were complete, an Attorney General ruling request would be submitted that evening, and the remaining records would be released." You requested the anticipated completion date, whether any additional nonprivileged records would be produced before August 28, and any applicable Attorney General tracking number or previous determination relied upon for withholding. You stated that you do not seek "privileged substance."

While you state that you "do not seek privileged substance," the City Attorney's office nevertheless is ethically obligated to our clients to complete a review for attorney-client privilege. That said, we have completed the review in preparation for our hearing this week. While we believe that the vast majority of the documents have been supplied to you previously, we are providing them specifically in response to this request via email, alongside this letter.

With that submission, the City has no further response on this TPIA request and considers it closed.

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** **May 21, 2026**

As noted, **"**The letter states that the OneDrive link remains available without restrictions or expiration, but neither your email nor the letter supplied that link."

The City did not re-provide the original OneDrive link in our August 25 correspondence because we did not know or believe that was necessary. However, per your request, a current working link is provided herein:

Regulatory Agency Correspondence (May 1, 2025–Present)

Further, we note that the May 21 "more emails" correspondence that you state our letter did not address was included – on page 70 of 112 – in the attachments you e-filed with "Petitioner's Limited Supplemental Hearing Brief, Count-Specific Scope, and Conferral Status" document on August 26.

The documents provided through the above OneDrive link (which is functional from our testing) are identical to those provided to you on May 21. However, to ensure that there are no further problems with access, the City is providing the responsive documents to you via a USB drive, to be delivered on August 28.

With that, the City has deemed this request to be fully responded to and closed.

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

Encl:
Exhibit A – City Attorney letter, 8.25.26
Exhibit B – Petitioner’s Response email, 8.26.26
Exhibits C-2 and C-3