From: **Kyle Moring** [redacted]
Subject: Texas Public Information Act Request - Search for "Kyle Moring / [redacted] / whistleblower / OSHA" (01/01/2024–12/29/2025)
Date: December 30, 2025 at 8:02 AM
To: Candias Webster cwebster@mpcity.org
Cc: Austin Beck abeck@dtrglaw.com, Rob Vine rvine@mpcity.org, [redacted], Wesley Lyon Wlyon@mpcity.org

KM

Good morning,

Pursuant to the Texas Public Information Act (Texas Government Code, Chapter 552), I request access to and copies of 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 01, 2024 through December 30, 2025 (inclusive).

1) Records requested

Please produce all existing records that contain any of the following identifiers or terms (case-insensitive), including in the subject line, message body, and attachments (to the extent your search tools allow searching attachments):

A. "Kyle Moring", "Moring", "Kyle Morning", "Mr. Moring", "Mr. Morning"

B. [redacted]

C. "whistleblower" (and "whistle blower," if searchable)

D. "OSHA" (and "Occupational Safety and Health Administration," if searchable)

This request includes, without limitation:

- Email messages (including attachments) sent/received by City and MPPD personnel using City/MPPD systems
- Internal communications and correspondence (letters, memos, notes) maintained electronically
- Any complaints, referrals, reports, summaries, or administrative records maintained electronically that contain the above terms

2) Systems/custodians to be searched

Please have the appropriate personnel conduct a reasonably thorough electronic search across:

- All City and MPPD email accounts and shared mailboxes
- Any email archiving/eDiscovery system used by the City/MPPD (to the extent applicable)
- Any City/MPPD network drive or document-management repository where such records are kept in the ordinary course of business

To help ensure an accurate and efficient search, I request that the City's IT staff assist in executing the search parameters. If Bryan IT is supporting City IT operations, please have Shawn Bryan (Bryan IT) perform or supervise the electronic query.

3) Preferred production format

I request production in electronic format whenever possible, including:

- Emails in native format (.eml/.msg or PST export), with associated metadata (date/time sent, sender, recipients, subject, and attachment

filenames)

- Attachments in their native file formats (PDF, DOCX, XLSX, etc.)
- If native email export is not feasible, a PDF printout is acceptable provided it includes message headers and attachment identification.

Rolling production is acceptable and preferred (produce records as they become available).

4) Public-interest request for waiver or reduction of charges (Tex. Gov't Code § 552.267)

I respectfully request that the City and MPPD waive or substantially reduce any charges associated with producing the requested records under Texas Government Code § 552.267, because providing copies of the requested information primarily benefits the general public.

This request is made in the public interest, including for the following reasons:

- The requested records concern whistleblower- and OSHA-related communications and issues that implicate public oversight of how the City and MPPD receive, document, and respond to safety-related or compliance-related concerns.
- I am acting as an employee representative for current Walmart Store #131 employees in Mount Pleasant, Texas, and these records are sought in furtherance of transparency for those employees and the broader community.
- Disclosure will promote transparency and accountability regarding the City's records retention, records management, search, and production practices, and will help inform the public about whether public information is being properly preserved and made accessible.
- I am requesting these records for non-commercial purposes, and I do not seek these records for financial gain or commercial advantage. I intend to use and share any non-exempt responsive records to inform affected employees and, where appropriate, the general public.

If the City/MPPD declines to grant a waiver or reduction, please provide a brief written explanation and proceed with the itemized written cost estimate required by law before incurring costs.

5) Fees and cost estimate

If you anticipate charges, please provide an itemized written cost estimate before incurring costs. If the total cost will exceed $40, please notify me in advance and do not proceed without my written authorization. If a fee waiver or reduction is available, please apply it.

6) Clarifications, exemptions, and redactions

If any portion of the requested information is withheld or redacted, please:

- Produce all reasonably segregable, non-exempt information
- Identify the specific statutory basis for each withholding/redaction

7) Communication

Please correspond with me by email at [redacted]. If you believe this request can be narrowed to reduce burden while still capturing responsive records, please provide a written proposal; however, please proceed at a minimum with the search for "Kyle Moring" and "[redacted]" while any narrowing discussion is pending.

Thank you for your assistance.

With gratitude,

Kyle Moring

[redacted] | [redacted]