From: **Candias Webster** cwebster@mpcity.org
Subject: RE: TPIA Request - 2025 payments and supporting records for Shawn Ray Bryan; Davidson Troilo Ream & Garza
Date: November 26, 2025 at 9:13 AM
To: Kyle Moring [redacted]

CW

Austin,

Will you please respond to him?

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: Kyle Moring <[redacted]>
Sent: Tuesday, November 25, 2025 10:02 AM
To: Candias Webster <cwebster@mpcity.org>
Cc: Austin Beck <abeck@dtrglaw.com>; Rob Vine <rvine@mpcity.org>; Wesley Lyon <wlyon@mpcity.org>; [redacted]
Subject: Re: TPIA Request - 2025 payments and supporting records for Shawn Ray Bryan; Davidson Troilo Ream & Garza

CAUTION: [EXTERNAL EMAIL]

Ms. Webster,

Thank you for the cost estimate concerning my Texas Public Information Act request regarding 2025 payments and supporting records for Shawn Ray Bryan and Davidson, Troilo, Ream, & Garza.

As with my original request, I respectfully request that the City continue to keep all of the parties copied on that request copied on all future communications related to this TPIA matter, including the individuals listed in the cc line above.

For purposes of Tex. Gov't Code § 552.2615(b), please treat this email as my **written response modifying and clarifying my request in light of the estimate**. I am not, at this time, accepting the $144 estimate as-is.

1) Required cost-estimate content under § 552.2615 and 1 TAC § 70.7

The estimate correctly itemizes, at a high level, the proposed labor and overhead charges and notes that the total is expected to exceed $40. It also advises that, if actual costs exceed the estimate by 20% or more, a revised estimate will be provided, and it recites the 10-business-day response options under § 552.2615(b).

However, the Attorney General's cost rules (1 Tex. Admin. Code § 70.7(a)) require that an itemized estimate for charges exceeding $40 also state **whether a less costly or no-cost way of viewing the requested information is available**, and explicitly inform the requestor that a written response may be delivered by mail, in person, by facsimile (if available), or by electronic mail (if the governmental body has an email address).

The November 25, 2025 letter does not address whether there is any less costly or no-cost method of viewing the requested records (e.g., initial in-person inspection, staged production, or limiting work to certain categories first), and it only mentions email as a response method. I respectfully request that the City:

1. **Confirm whether a less costly or no-cost way of viewing the responsive information is available** for this request and, if so, describe those options; and
2. **Confirm all of the written response methods available** to me under § 552.2615 and 1 TAC § 70.7 (mail, in-person delivery, facsimile if available, and email).

Because the Attorney General's rules tie the City's ability to collect charges above $40 to the provision of a compliant itemized estimate, I ask that the City treat this as an opportunity to cure any omissions and issue a corrected estimate, if needed.

2) Clarification of the 8 hours of labor

The estimate lists eight (8) hours of personnel time at $15/hour, plus 20% overhead, and indicates zero copies. To ensure that the charges are limited to those allowed under the TPIA and the Attorney General's cost rules, I respectfully request a brief explanation of how the City arrived at the 8-hour figure. In particular, please indicate:

Approximately how much time is attributed to:

- locating responsive payment records (check/ACH registers, vendor payment detail, general ledger detail);
- retrieving and assembling supporting documentation (invoices, statements, fee bills, and related backup);
- retrieving contracts/engagement letters and related procurement/authorization records; and
- identifying and collecting the limited email correspondence that transmits invoices or documents "OK to pay" approvals.

Please also confirm that the City is **not charging for any attorney or legal staff time spent reviewing records to determine whether to assert exceptions to disclosure** or to prepare a request for a ruling from the Attorney General, in accordance with 1 Tex. Admin. Code § 70.3(d)(3).

If it is easier, a narrative description or a simple breakdown by category will be sufficient; I am not requesting a formal time sheet at this stage.

3) Willingness to consider reasonable narrowing

My original request was intentionally limited to:

- 2025 payments to two specific vendors; and
- records that show and explain those payments (payment records, invoices/fee bills,

contracts/engagement records, related agenda/authorization materials, and only those emails that transmit invoices or payment approvals).

I remain willing to discuss reasonable narrowing to reduce the time and cost required to respond. For example, once I understand which categories are driving the eight hours of estimated labor, I may elect to:

- Prioritize payment registers, vendor payment detail, invoices/fee bills, and the associated contracts/engagement letters; and/or
- Temporarily defer certain categories, such as some procurement background or older transmittal emails, if they prove to be disproportionately time-consuming to assemble.

To allow me to make an informed decision, I request that the City:

1. Provide the clarifications in Sections 1 and 2 above; and
2. Indicate, in general terms, which portions of my request appear to account for the majority of the estimated labor.

4) Bond requirement

I understand that Tex. Gov't Code § 552.263 allows the City to require a deposit or bond when estimated charges exceed the statutory threshold, and your letter states that a bond for the full $144 would be required if I accept the estimate. For now, I am not accepting the estimate and therefore am not prepared to post a bond.

After I receive the requested clarifications and any revised cost estimate that complies with § 552.2615 and the Attorney General's cost rules, I will promptly let you know whether I accept the revised charges, wish to further modify the request, or intend to pursue the cost-complaint option described in § 552.2615(b)(3).

Thank you for your attention to these points. I appreciate the City's efforts to comply with the TPIA and look forward to working with you to resolve the cost estimate and obtain the requested records in an efficient, lawful manner.

With gratitude,

Kyle Moring

[redacted] | [redacted]

On Nov 25, 2025, at 9:26 AM, Candias Webster <cwebster@mpcity.org> wrote:

Good morning, Kyle,

Please find attached an itemized statement of estimated charges associated with the public information request received by the City from you on November 13, 2025, as required by Chapter 552, Tex. Gov't Code.

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: Kyle Moring <[redacted]>
Sent: Wednesday, November 12, 2025 5:42 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Austin Beck <abeck@dtrglaw.com>; Rob Vine <rvine@mpcity.org>; Wesley Lyon <wlyon@mpcity.org>; [redacted]
Subject: TPIA Request - 2025 payments and supporting records for Shawn Ray Bryan; Davidson Troilo Ream & Garza

CAUTION: [EXTERNAL EMAIL]

Good evening,

Pursuant to the Texas Public Information Act, Texas Government Code ch. 552, I request the records described below for calendar year **2025**, held by the City of Mount Pleasant and any City-affiliated component unit that issued or processed the payment (including, if applicable, the Mount Pleasant Economic Development Corporation).

This request concerns payments to the following **payees** identified in the City's accounts-payable check registers:

- **Shawn Ray Bryan** (appearing with "Data Processing Maintenance").
- **Davidson Troilo Ream & Garza** (appearing with "Contractual and Fee Services" and project-related descriptions).

By way of reference, examples include Check Nos. **214732** (Shawn Ray Bryan), **214859** (Davidson Troilo Ream & Garza), all dated in September 2025.

Requested records (for each payee, for all 2025 payments):

1. **All payment records** showing each payment made in 2025, including check/ACH/warrant registers, voucher approvals, and any reports or summaries (e.g., vendor payment detail, general ledger detail) sufficient to show **date, amount, fund, account/object code, description, and check/transaction number**.

2. **Documentation describing what the City paid for**, including (as applicable) **invoices, statements, fee bills, billing backups, timesheets, deliverable lists, and narrative descriptions of services** supporting each 2025 payment.

    - For attorney billings (e.g., Davidson Troilo Ream & Garza), please produce **attorney fee bills**; any privileged narrative may be redacted rather than withheld in full, consistent with the Act.

3. **Contracts and engagement documents** covering the 2025 work: contracts, retainer or engagement letters, purchase orders, statements of work, order forms, amendments, change orders, task orders, or renewal notices.

4. **Procurement/authorization records** associated with the 2025 engagements: council/board agenda items and minutes approving or ratifying the engagement or payments; staff memoranda/recommendations; bid/quote/proposal, evaluation, and award materials (if any); and required compliance filings such as **Form 1295 Certificates of Interested Parties**, if applicable.

5. **Correspondence** (email or letters) **transmitting invoices or approving payment** (e.g., "OK to pay" messages or invoice transmittal emails) for the 2025 invoices to these payees. I am not requesting every project-related email—only messages **that attach the invoice** or **document approval for payment**.

Format & delivery: Please provide responsive records **electronically** (PDF/CSV/native files) via email or secure download. If any responsive information exists in spreadsheets or databases, please produce those in a **machine-readable** format. Please do not scan paper printouts of electronic files where a direct export is feasible.

Redactions & exemptions: If you contend any portion is exempt, please **redact only the exempt portions** and release the remainder, identifying the specific statute for each redaction. If you seek an Attorney General ruling, please do so within the time required by **§ 552.301** and notify me.

Costs: If estimated charges are expected to exceed **$40**, please submit an **itemized written estimate** before proceeding, as required by **§ 552.2615**. I authorize up to **$100** in costs without further approval. I am willing to discuss a reasonable narrowing if it would be helpful in reducing time or cost.

Search clarification: This request is intended to be specific and limited to payments and the records that **show and explain** those payments for the named payees in **2025**. If any part of this request is unclear, please contact me so we can clarify.

Thank you for your prompt attention to this matter.

With gratitude,

Kyle Moring

[redacted] | [redacted]