From: Kyle Moring [redacted]
Subject: Texas Public Information Act Request - Walmart-related email communications and keyword search (01/01/2024–12/29/2025)
Date: December 30, 2025 at 7:59 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 29, 2025 (inclusive), as described below.

1) Records requested – Walmart-related email communications (domain-based)

Please produce all email messages (including attachments) sent to or received from any email address with the following domains:

- @walmart.com
- @wal-mart.com

This includes emails where these domains appear in any sender/recipient field (From, To, CC, and, to the extent technically accessible, BCC), during the date range stated above.

2) Records requested – Walmart-related keyword search (subject/body/attachments)

In addition, please produce all existing records that contain any of the following terms (case-insensitive), including in email subject/body and attachments (to the extent your search tools allow searching attachments):

A. “Walmart Store #131”

B. “Walmart Store 131”

C. “Walmart #131”

D. “Store #131” (when used in connection with Walmart, if your tools allow proximity searching)

E. “Wal-mart” / “Wal-Mart” / “Wal Mart”

F. “Walmart”

G. “Walmart Supercenter” / “Walmart Super Center” (if searchable)

3) Systems/custodians to be searched

Please 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

If the City [illegible]

If the City believes that a keyword search across all custodians would be overly burdensome, please proceed at a minimum with:

- The domain-based production for @walmart.com and @wal-mart.com (Item 1), across City and MPPD email systems
- A keyword search limited to departments reasonably likely to maintain responsive records (e.g., Administration/City Manager, City Attorney (if applicable), Finance/Purchasing, Planning & Development/Building & Code/Code Compliance, Fire, and MPPD command/administration), while providing a written estimate of the additional burden for a citywide keyword search

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.

4) 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.

5) 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:

- I am acting as an employee representative for current Walmart Store #131 employees in Mount Pleasant, Texas, and the requested records concern communications with a major local employer and matters that may affect workers and the broader community.
- The requested records will contribute to public understanding and oversight of how City departments and MPPD communicate with and respond to issues involving large employers operating within the City.
- Disclosure will promote transparency and accountability regarding the City's records-creation, retention, search, and production practices, including any records-management issues affecting public access to public information.
- 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.

6) 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.

7) Clarifications, exemptions, and redactions

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

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

8) Communication

Please correspond with me by email at [redacted].

Thank you for your assistance.

With gratitude,

Kyle Moring

[redacted] | [redacted]