From: Kyle Moring [redacted]
Subject: Texas Public Information Act Request – OAG Informal Complaint Files and 552.3215 Communications
Date: May 27, 2026 at 1:02 PM
To: Candias Webster cwebster@mtpleasanttx.gov
Cc: Austin Beck abeck@dtrglaw.com

KM

Good afternoon,

This is a request for public information under the Texas Public Information Act, Chapter 552 of the Texas Government Code.

Please produce the existing public records described below, in electronic form if available.

First, for each of the following Texas Attorney General informal/open-records complaint matters involving Kyle Moring and the City of Mount Pleasant, please produce the complete record of what the City, its employees, officials, representatives, or outside counsel filed, submitted, uploaded, sent, or otherwise provided to the Texas Attorney General:

- OR-25-055840-IC
- OR-25-057987-IC
- OR-25-058955-IC
- OR-25-059503-IC
- OR-26-000002-IC
- OR-26-004942-IC
- OR-26-006368-IC
- OR-26-006369-IC

For each listed complaint, this request includes, but is not limited to:

1. Any certification form submitted to the OAG.
2. Any written response, explanation, position statement, letter, email, portal message, or other communication sent to the OAG.
3. Any attachments, exhibits, supporting documents, affidavits, declarations, screenshots, request logs, response logs, email chains, or other materials provided to the OAG.
4. Any transmittal records, upload confirmations, portal receipts, fax confirmations, mail receipts, or email delivery records showing what was filed and when.
5. Any correspondence between the City and the OAG concerning the resolution, closure, status, or handling of each complaint.
6. Any records maintained by the City's outside counsel or agents, including Davidson Troilo Ream Garza and/or Austin R. Beck, to the extent those records were created, collected, assembled, maintained, sent, received, or held on behalf of the City or are otherwise records to which the City has a right of access.

Second, please produce all existing records reflecting what the City, its officials, employees, representatives, or outside counsel stated, submitted, represented, or communicated to the Texas Attorney General's Criminal Prosecutions Division concerning my Texas Government Code § 552.3215 complaint process, including the matter that resulted in the OAG Determination Letter dated May 22, 2026.

This second category includes, but is not limited to:

1. All communications between the City, its outside counsel, or any City representative and the OAG Criminal Prosecutions Division concerning Kyle Moring, my § 552.3215 complaint, or the City's Public Information Act compliance.
2. All letters, emails, portal submissions, memoranda, response packets, factual summaries, explanations, affidavits, declarations, exhibits, attachments, or supporting records provided to the Criminal Prosecutions Division.
3. All records reflecting telephone calls, meetings, interviews, or other communications with the Criminal Prosecutions Division, including call notes, meeting notes, calendar invitations, attendance records, summaries, or follow-up communications.
4. All records concerning the May 22, 2026 OAG Determination Letter, including any drafts, responses, transmittals, cover emails, attachments, or communications about the determination.
5. All communications with any other OAG division or staff member concerning referral to, consultation with, or review by the Criminal Prosecutions Division regarding my § 552.3215 complaint.
6. All communications and records held by outside counsel or agents acting for the City in connection with that § 552.3215 complaint process.

For both categories, please search records maintained by the City Secretary, City Manager, City Attorney or outside counsel, any public information officer or open records staff, and any City employee or official who participated in responding to the OAG informal complaints or the § 552.3215 matter. Please include records in email accounts, attachments, OAG portal accounts, shared drives, records management systems, paper files, and outside counsel files maintained for the City.

For clarity, I am requesting existing records. I am not asking the City to create a new answer, perform legal research, or provide a narrative explanation. However, if no responsive records exist for any complaint number or category, please state that no responsive records exist for that specific complaint number or category.

number or category.

Please produce records in native electronic format when feasible, including complete email chains with attachments and visible header information showing sender, recipient, cc/bcc if available, subject, and date/time. Please do not convert electronic records to paper unless no electronic copy exists.

If the City contends any responsive record is exempt from disclosure, please release all reasonably segregable non-exempt portions. For any withheld or redacted records, please identify the record or category of records withheld, the asserted basis for withholding or redaction, and whether the City will seek an Attorney General decision.

Please notify me in advance if the City estimates that charges will exceed $40. I do not authorize charges above $40 without a written itemized cost estimate and my prior written approval.

With gratitude,

Kyle Moring

[redacted]