From: **Kyle Moring** [redacted]
Subject: Re: Texas Public Information Act Request – OAG Informal Complaint Files and 552.3215 Communications
Date: June 3, 2026 at 2:50 PM
To: Candias Webster cwebster@mtpleasanttx.gov
Cc: Austin Beck abeck@dtrglaw.com, Lea Ream lream@dtrglaw.com, Rob Vine rvine@mtpleasanttx.gov, Wesley Lyon wlyon@mtpleasanttx.gov, Carl Hinton chinton@mtpleasanttx.gov, Debbie Corbell dcorbell@mtpleasanttx.gov, Kelly Redfearn kredfearn@mtpleasanttx.gov, Jonathan Hageman jhageman@mtpleasanttx.gov, Melanie Knight melanie.knight@mtpleasanttx.gov

Ms. Webster,

I am copying Mayor Lyon and the Mount Pleasant City Council because the City's June 2, 2026 production for my May 27, 2026 Texas Public Information Act request remains incomplete in both format and content, and the City's two-hour labor charge is difficult to reconcile with the City's own produced records.

Councilmembers are copied for notice and oversight only. I am not requesting discussion, deliberation, or reply-all communications by the governing body. To avoid any Texas Open Meetings Act concern, any substantive response should come from the City Secretary, City Manager, City Attorney, outside counsel, or another authorized City representative. If any Council consideration is required, it should be handled only through a properly posted public meeting process.

My May 27, 2026 request sought records concerning OAG informal complaint files and the Texas Government Code § 552.3215 complaint process. It expressly requested 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. It also specifically requested, for each listed OAG informal complaint, "any certification form submitted to the OAG."

The updated OneDrive link now works. However, the folder still does not appear to contain the native email records requested. I do not see .msg files for the responsive City Outlook/Exchange/Microsoft 365 email communications. Instead, the production appears to contain PDF-rendered email binders and converted records. The City has not stated in writing that native .msg production is technologically infeasible, that the City lacks the software/hardware ability to export emails in native format, that copyright prevents native-format production, or that the native email records do not exist.

The production also does not appear to include any signed or submitted certification forms provided to the OAG for the informal complaint matters I listed in my request. This is a separate omission from the native-format issue. The OAG complaint notices state that certification forms were enclosed for the City's response, and my May 27 request specifically requested any certification forms submitted to the OAG. If the City used certification forms, please produce the completed/signed/submitted forms. If the City did not use the certification forms for one or more complaint numbers, please state that specifically by complaint number and identify what written response, portal submission, or other communication was submitted to OAG instead.

The City's own produced correspondence also shows that responsive materials exist beyond the PDF binders currently provided. In particular, the records reference an "OAG Complaint" SharePoint/OneDrive folder, a working Excel spreadsheet, color-coded completion/status indicators, document files in the folder, a "different color" item for Austin Beck to respond to, as well as image attachments from a phone. Those folders, files, native attachments, folder structures, and metadata do not appear to have been produced.

Separately, I am requesting clarification and reconciliation of the $30.00/two-hour labor charge. I paid the invoice to avoid delay and to obtain access to the production, but the City's own produced correspondence appears to show that the core responsive materials had already been collected, organized, linked, and used before my May 27 request. Specifically, Ms. Webster's April 17, 2026 email to Kent Richardson and Austin Beck states that she was providing "the link to the folder I'm working out of," identifies that folder as "OAG Complaint," states that the Excel spreadsheet was in the folder, and explains the green/yellow completion-status coding. Ms. Webster's May 5, 2026 email then states that she had "provided all the documentation and updated the spreadsheet" for the requests in that link. Given those records, the later two-hour charge for "gathering" information is difficult to reconcile without an explanation of what new chargeable labor was performed for the June 2 production.

Please supplement the production and produce the following records:

1. All completed, signed, submitted, uploaded, or otherwise filed certification forms for each OAG informal complaint listed in my May 27 request, including 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, and OR-26-006369-IC. This includes any paper certification form, scanned certification form, electronic certification, portal certification, or equivalent response certification.
2. If no certification form was submitted for any listed complaint number, please state that specifically by complaint number and produce the written response, portal submission, email, letter, or other record the City submitted to OAG in place of the certification form.
3. All transmittal records, portal receipts, upload confirmations, email delivery confirmations, file names, submission timestamps, and related records showing when each certification form or alternative written response was submitted to OAG.
4. All native email message files for the communications included in the City's PDF binders, including the "RE: PIA Complaint - Kyle Moring" chain and the "Re: Supplemental Information for Pending § 552.3215 Review – City of Mount Pleasant / L260017200" chain. For City Outlook/Exchange/Microsoft 365 records, please produce .msg files with attachments preserved. If any responsive email is maintained in .eml or another native email format, please identify and produce that native format.
5. All attachments to those emails in their native or original formats, including all spreadsheet attachments, complaint attachments, supporting documents, image attachments, phone screenshots, and any attached email referenced in the correspondence.
6. The spreadsheet attached to Kent Richardson's March 30, 2026 email to Austin Beck, and all later versions, edited versions, drafts, uploads, downloads, or copies of that spreadsheet maintained by the City, outside counsel, or any City agent.

downloads, or copies of that spreadsheet maintained by the City, outside counsel, or any City agent.

7. The formal PIA complaint attachment referenced in Kent Richardson's March 31, 2026 email, and any copies of formal complaints OAG provided to the City, Candias Webster, Austin Beck, Davidson Troilo Ream Garza, Lea Ream, or any other City representative.
8. The complete contents of the "OAG Complaint" SharePoint/OneDrive folder referenced in the City's April 17, 2026 and May 5, 2026 correspondence with OAG and Austin Beck, including the full folder tree, all files, all subfolders, the Excel spreadsheet referenced by Ms. Webster, all documents contained in that folder, and all records showing the green/yellow/different-color status coding referenced by Ms. Webster.
9. All records showing which folders, spreadsheet lines, or items were considered complete, incomplete, answered, unanswered, assigned to Austin Beck, or otherwise tracked during the City's response to OAG Criminal Prosecutions.
10. The "different color" item Ms. Webster stated Austin Beck would need to respond to, including Mr. Beck's response, drafts, notes, emails, attachments, or related communications.
11. The "attached email" referenced in the May 7, 2026 follow-up discussion concerning line #17, including that attached email in native format and all related attachments.
12. All attachments listed in Ms. Webster's May 12, 2026 email transmitting "documents from the phone," including IMG 0487.PNG, IMG 0486.PNG, image001.png, image003.png, image005.png, image006.png, image007.png, image013.png, image014.png, image015.png, and image017.png. If any of those image files are only non-substantive signature-block graphics or logos, please identify that in writing.
13. All SharePoint/OneDrive records, metadata, version-history records, sharing-link records, permission records, access records, upload records, download records, audit logs, link-expiration records, and file/folder metadata maintained by the City for the "OAG Complaint" folder and the June 2, 2026 production folder.
14. All OAG portal submissions, portal messages, upload confirmations, transmittal records, receipts, delivery confirmations, or file-share communications concerning the OAG informal complaints and the § 552.3215 Criminal Prosecutions Division review.
15. All outside-counsel records held by Davidson Troilo Ream Garza, Austin Beck, Lea Ream, or any other City agent concerning the City's OAG complaint responses, the certification forms, the "OAG Complaint" folder, the spreadsheet, the formal complaints, the line-item OAG questions, and the City's communications with OAG Criminal Prosecutions.
16. All City-held records and outside-counsel-held records concerning communications with Titus County District Attorney Charles C. Bailey or the Titus County District Attorney's Office regarding Kyle Moring, my § 552.3215 complaint, OAG file L260017200, the City of Mount Pleasant's TPIA compliance, MPPD Case No. [redacted], Walmart Store #131, or records provided to or received from Bailey's office.
17. All records reflecting telephone calls, meetings, notes, or summaries concerning the City's communications with OAG Criminal Prosecutions regarding my § 552.3215 complaint, including call notes, meeting notes, calendar entries, attendance records, and follow-up communications.
18. All records sufficient to show whether any responsive certification form, attachment, native email, folder, spreadsheet, file, metadata record, portal record, or referenced document was withheld, redacted, omitted, not searched, deleted, unavailable, or determined not to exist.

For SharePoint/OneDrive folders, I am not asking for live access to the City's internal system. I am requesting copies or exports of the existing records, files, folder structures, and metadata described above. A downloadable ZIP file preserving folder structure is acceptable. If metadata cannot be preserved in the ZIP export, please produce a metadata export or index showing, at minimum, file name, folder path, created date, modified date, created by, modified by, file size, file type, and parent folder.

Please do not convert native electronic emails, spreadsheets, or certification forms into PDF unless no native electronic copy exists. If the City contends it cannot produce any requested native format, please state the specific reason in writing, including whether the issue is technological ability, software/hardware limitations, copyright, nonexistence of the native record, or another asserted reason. If the City maintains responsive email records in a native format other than .msg, please identify and produce that native format.

This is not a new request, not a narrowing of my May 27, 2026 request, and not a waiver of native-format production. It is notice that the City's June 2 production appears incomplete and does not comply with the format requested. To the extent the City contends any item listed above is outside the May 27 request, please treat this email as a new request under the Texas Public Information Act for those existing records.

Please also provide a cost reconciliation for the $30.00/two-hour labor charge, identifying the tasks included in the two hours charged for this request. Please specify whether the time was for locating records, compiling records, exporting records, converting records, creating the June 2 OneDrive link, uploading files, reviewing records for exceptions, redacting records, preparing correspondence, preparing the § 552.275 statement, or any other task.

Please also identify whether any portion of the two hours included attorney time, legal-assistant time, exception review, privilege review, preparation of legal analysis, preparation for a possible Attorney General ruling, or preparation of the § 552.275 personnel-time statement. My payment of the $30.00 invoice should not be treated as a waiver of my right to question the charge, request a reconciliation, or pursue any available cost-review process if the charge included non-chargeable time or if the production remains incomplete.

The June 2 updated-link email also included a § 552.275(d) statement showing "YTD Total" of 25.5, "Yearly Total Allowed" of 36, and "Yearly Hours Left" of 10.5. Please provide a corrected or clarified § 552.275(d) statement identifying the amount of personnel time spent complying with this specific request and the cumulative amount of time attributed to me for the applicable monthly or yearly period. Please do not include time spent preparing the §

request and the cumulative amount of time attributed to me for the applicable monthly or yearly period. Please do not include time spent preparing the § 552.275(d) statement itself.

If the City contends that no responsive records exist for any listed category, please state that specifically by category. That includes, without limitation, any contention that no signed or submitted certification form exists for one or more OAG informal complaint numbers. If the City contends that any responsive record is excepted from disclosure, please release all reasonably segregable non-exempt portions and identify the asserted basis for withholding or redaction, including whether the City will seek an Attorney General decision.

Please do not continue to treat the May 27 request as closed until the native-format, missing-certification, and missing-record issues are resolved, or until the City states its position in writing.

Please also preserve all responsive records, including signed certification forms, submitted certification forms, native emails, attachments, SharePoint/OneDrive files, folder structures, metadata, version histories, audit logs, access logs, download logs, upload logs, link records, OAG portal records, and outside-counsel records.

Please confirm receipt and provide the City's position on the missing certification forms, native-format production, missing SharePoint/OneDrive materials, and the two-hour cost reconciliation.

With gratitude,

Kyle Moring
[redacted]

> On Jun 2, 2026, at 2:55 PM, Kyle Moring <[redacted]> wrote:
>
> Ms. Webster,
>
> Thank you for the updated link. I can now access the folder.
>
> However, the updated folder still does not appear to contain the responsive email records in native message format. I do not see .msg files for the responsive email communications. The files provided appear to be converted files rather than the native electronic email records requested.
>
> As stated in my May 27, 2026 request, I requested 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. As stated again in my June 2, 2026 email, for responsive email records maintained in the City's Microsoft Outlook/Exchange/Microsoft 365 environment, please produce the native message files in .msg format, with attachments preserved, rather than PDF printouts, screenshots, or converted image files.
>
> Please supplement the production with the responsive email records in .msg format. If the City maintains the responsive email records in another native email format, such as .eml or another export format, please identify that format and produce the emails in that native format. If attachments are exported separately, please preserve and identify the parent-child relationship between each email and its attachments.
>
> This is not a new request, a narrowed request, or a modified request. It is a follow-up regarding the format of the City's production under my May 27, 2026 request.
>
> If the City contends it cannot produce responsive emails in .msg format, please state that position in writing and identify the specific reason, including whether the issue is technological ability, software/hardware limitations, copyright, nonexistence of native email records, or some other asserted reason. If the City contends that the currently posted files are the complete production and that no native-format email records will be produced, please state that clearly in writing.
>
> Please do not treat the request as complete or closed until the native-format production issue is resolved or the City provides its written position explaining why native-format production is not feasible.
>
> With gratitude,
>
> Kyle Moring
> [redacted]
>
> > On Jun 2, 2026, at 2:37 PM, Candias Webster <cwebster@mtpleasanttx.gov> wrote:
> >
> > Mr. Moring,
> > Here is the updated link.
> > <image001.png> Texas Public Information Act Request – OAG Informal Complaint Files and 552.3215 Communication
> >
> > as required by Sec. 552.275(d), Tex. Gov't Code:
> >
> > (d) If a governmental body establishes a time limit under Subsection (a), **each time**

the governmental body complies with a request for public information, the governmental body shall provide the requestor with a written statement of the amount of personnel time spent complying with that request and the cumulative amount of time spent complying with requests for public information from that requestor during the applicable monthly or yearly period. The amount of time spent preparing the written statement may not be included in the amount of time included in the statement provided to the requestor under this subsection unless the requestor's time limit for the period has been exceeded.

The below information reflects hours spent on your request for fiscal year 2026

YTD Total	**Dates**	**25.5**
Yearly Total Allowed		**36**
Yearly Hours Left		**10.5**

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, June 2, 2026 12:59 PM
To: Candias Webster <cwebster@mtpleasanttx.gov>
Cc: Austin Beck <abeck@dtrglaw.com>
Subject: Re: Texas Public Information Act Request – OAG Informal Complaint Files and 552.3215 Communications

Ms. Webster,

Thank you for sending the OneDrive link.

I am unable to download the files from the OneDrive folder. Please either enable download permissions for the folder/files or resend the responsive records by another downloadable electronic method, such as a ZIP file, email attachments, or a downloadable file-transfer link.

I also note that the records made available do not appear to be in native electronic format. My May 27, 2026 request specifically requested native electronic records where feasible, including complete email chains with attachments and visible header information. **For responsive email records maintained in the City's Microsoft Outlook/Exchange/Microsoft 365 environment, please produce the native message files in .msg format, with attachments preserved, rather than PDF printouts, screenshots, or converted image files.**

For non-email attachments or other electronic records, please produce each record in the native format in which it is maintained, such as PDF, DOCX, XLSX, image files, portal records, upload confirmations, receipts, or other original file types. If a record was originally created or received as a PDF, the original PDF is acceptable. My concern is the conversion of emails or other electronic records into non-native PDF/image form when the native files are available.

This is not a new request, not a narrowing of my May 27, 2026 request, and not a modification of that request. I am notifying the City that the current production method is not downloadable and does not appear to provide the native-format electronic records requested.

If the City contends it cannot provide responsive emails in .msg format, or cannot provide any other responsive records in native format, please state that position in writing and identify the specific reason native-format production is not feasible. If the City maintains the responsive emails in a different native email format, please identify that format and produce the records in that native format instead.

Please confirm when download access has been enabled and when the responsive records will be produced in native electronic format.

With gratitude,

Kyle Moring

[redacted] | [redacted]

> On Jun 2, 2026, at 12:41 PM, Candias Webster <cwebster@mtpleasanttx.gov> wrote:
>
> Mr. Moring,
> Here is the link to the information you requested.
>
> <image001.png> Texas Public Information Act Request – OAG Informal Complaint Files and 552.3215 Communication

This request is closed 06/02/2026

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, June 2, 2026 11:03 AM
To: Candias Webster <cwebster@mtpleasanttx.gov>
Cc: Austin Beck <abeck@dtrglaw.com>
Subject: Re: Texas Public Information Act Request – OAG Informal Complaint Files and 552.3215 Communications

Ms. Webster,

I called and paid the $30.00 invoice for my May 27, 2026 Texas Public Information Act request by phone at approximately 10:00 a.m. this morning.

Please confirm that payment has been received and proceed with production of the responsive records. Your email stated that once payment was complete, you would send the information.

This payment does not modify, narrow, or withdraw any portion of my May 27, 2026 request. Please produce the responsive records electronically in the format requested. If any responsive records or portions of records are withheld or redacted, please provide the required notice identifying the asserted basis for withholding or redaction.

Please also provide a receipt or payment confirmation for my records.

With gratitude,

Kyle Moring

[redacted] | [redacted]

On Jun 2, 2026, at 9:43 AM, Candias Webster <cwebster@mtpleasanttx.gov> wrote:

Mr. Moring,
Please find attached your invoice. If you could please call Karina at 903-575-4000 to pay. Once complete I will send you the information.

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: Monday, June 1, 2026 8:37 AM
To: Candias Webster <cwebster@mtpleasanttx.gov>
Cc: Austin Beck <abeck@dtrglaw.com>
Subject: Re: Texas Public Information Act Request – OAG Informal Complaint Files and 552.3215 Communications

Ms. Webster,

I confirm that I want the City to proceed with processing and producing records

responsive to my May 27, 2026 Texas Public Information Act request.

I approve proceeding at the City's stated estimated charge of $30.00 and confirm my prior authorization for charges up to, but not exceeding, $40.00. Please do not incur or assess any charge above $40.00 without first providing a written itemized estimate and receiving my written approval.

This confirmation does not modify, narrow, or withdraw any portion of my request.

Please produce the responsive records electronically, preferably in native electronic format where available, including complete email chains, attachments, and visible header information as requested. Please also ensure that any labor charge excludes attorney time, legal assistant time, or other time spent reviewing records for exceptions, preparing legal analysis, or preparing any request for an Attorney General decision.

If the City contends that any responsive record or portion of a record is excepted from disclosure, please promptly release all reasonably segregable non-exempt portions and provide the notice and copies required by Texas Government Code § 552.301. If the City contends no responsive records exist for any complaint number or category listed in my request, please state that specifically by complaint number or category.

With gratitude,

Kyle Moring

[redacted] | [redacted]

> On Jun 1, 2026, at 8:11 AM, Candias Webster <cwebster@mtpleasanttx.gov> wrote:
>
> The City of Mount Pleasant, Texas (the "City") received a public information request from you on May 27, 2026, for "Texas Public Information Act Request – OAG Informal Complaint Files and 552.3215 Communications." The City anticipates 2 hours of staff time to gather information responsive to your request; therefore, the City is entitled to reimbursement cost associated with labor that will be incurred by the City in processing your request. Charges for providing you with information responsive to your request will not be waived because the City has not determined that providing copies of responsive information will primarily benefit the

general public.

The City has determined that fulfilling your request will result in the imposition of a charge of $30.00 for recovery of costs incurred by the City in order to process your request.

Please confirm if you would like us to proceed

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, May 27, 2026 1:02 PM
To: Candias Webster <cwebster@mtpleasanttx.gov>
Cc: Austin Beck <abeck@dtrglaw.com>
Subject: Texas Public Information Act Request – OAG Informal Complaint Files and 552.3215 Communications

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

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.

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] | [redacted]