From: **Kent Richardson** Kent.Richardson@oag.texas.gov
Subject: RE: PIA Complaint - City of Mount Pleasant
Date: July 8, 2026 at 11:36 AM
To: Kyle Moring [redacted]

KR

Mr. Moring,

To answer your first question, yes, the determination issued will remain the determination unless it becomes necessary to amend at some future date.

To answer your second question, a review of the certifications you supplemented has also suspended due to the closure of the complaint as indicated in deference to the court action.

With respect to the request to reconsider the complaint against the Titus County District Attorney, I will also follow-up with Mr. Bailey to address the possible discrepancies in the timeline you note as well as to re-confirm complete release.

Thank you.

Kent Richardson
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(512) 922-6124
(512) 397-1642 Fax
kent.richardson@oag.texas.gov

From: Kyle Moring <[redacted]>
Sent: Tuesday, July 7, 2026 8:55 PM
To: Kent Richardson <Kent.Richardson@oag.texas.gov>
Subject: Re: PIA Complaint - City of Mount Pleasant

Mr. Richardson,

Thank you for the update.

I understand your position that the request for further review of the City of Mount Pleasant complaint will be closed in deference to the pending mandamus action, consistent with ORD's handling of related matters. I also understand that you are continuing to work on the DSHS and Fort Worth requests for reconsideration.

I would appreciate clarification on three points.

First, with respect to the City of Mount Pleasant matter, please confirm whether the May 22, 2026 determination will remain the operative public determination without revision, or whether your office will issue any notation or supplemental closure notice clarifying that further review is being closed because the matter is now before the trial court, rather than because the supplemental counter-evidence was reviewed and rejected.

My concern is that the mandamus action may resolve production, search, withholding, and access issues going forward, but it does not necessarily resolve the separate problem that the existing OAG determination remains a public record reflecting no-violation / cured findings based on City representations that I have since disputed with City records, third-party records, later City productions, ORD certification materials, and court filings. I am trying to understand how closure in deference to mandamus resolves that issue if the unrevised determination remains the public record.

Second, I specifically request clarification regarding the City's signed certifications to ORD. The certification materials produced through PIR No. R032947 show multiple City certifications, executed by Candias Webster, selecting the option that the City had made available "all existing responsive information." I have provided your office with substantial counter-evidence showing that several of those certifications appear materially disputed by City records, third-party records, later City productions, and the City's own later admissions.

That issue is not merely a production dispute. It goes to accountability. If the City certified complete production to ORD, and those certifications are materially contradicted by the record, then closing the Request for Revision solely because a mandamus case is pending appears to leave the certification issue unresolved. Please clarify whether your office has reviewed the certification evidence as part of the Request for Revision, and whether the closure in deference to mandamus means your office is declining to address the certification/accountability issue.

This is also why I continue to press the issue despite the time and effort involved. I have pursued these matters more persistently than most requestors realistically could, and I have been able to compare City certifications, City productions, third-party agency records, later productions, OAG records, and court filings across many months. Most requestors would not have the time, resources, or record access to identify those contradictions. If signed certifications, no-records positions, incomplete productions, and contradictory representations are left unaddressed when the record materially disputes them, then the same practices can affect other requestors without meaningful consequence. My concern is therefore not only about my own records requests; it is about whether the public information process remains reliable for anyone who does not have the ability to pursue the issue this far.

Third, please clarify the status of my separate Request for Revision concerning the April 17, 2026 determination regarding the Titus County District Attorney's Office / Charles C. Bailey. That request is separate from the City of Mount Pleasant mandamus action. The mandamus case is against the City of Mount Pleasant and does not address TCDA's production to me, TCDA's response to my February 27 request, the later Bailey / Nipp production, the native-format / forwarded-email issue, or the scope of Mr. Bailey's review of my City complaint.

This issue also ties directly into the TCDA Request for Revision. Mr. Bailey issued a no-violation determination regarding the City while his office had, or appears to have had, City / MPPD records in its possession that were relevant to the City's no-records and complete-production representations. He later produced some of those records to me, including materials that appear to contain unredacted social security number information and DFPS / CPS history-related information. That raises a separate issue that mandamus against the City will not resolve: whether TCDA's review of the City complaint was complete and reliable, and whether TCDA's own production practices complied with Chapter 552 and appropriate confidentiality / redaction standards.

Your email refers to the DSHS and Fort Worth requests for reconsideration, but it does not address the TCDA / Bailey Request for Revision. Please confirm whether that TCDA request remains pending, has been closed, or will be addressed separately.

I am not submitting additional evidence in this email. I am asking for clarification of the procedural status of the City Request for Revision, the City certification materials, and the separate TCDA / Bailey Request for Revision so I can accurately understand what remains pending before your office and what issues your office considers resolved.

Respectfully,

Kyle Douglas Moring
[redacted]

On Jul 7, 2026, at 5:46 PM, Kent Richardson <Kent.Richardson@oag.texas.gov> wrote:

Mr. Moring,

While I have been concentrating on resolving the DSHS and Fort Worth requests for reconsideration, I wanted to note that like the Open Records Division, your request for further review of the Mt. Pleasant complaint will likewise be closed in deference to the mandamus action you have undertaken to address the various items of your PIA complaint. That process should resolve the issues you have raised in your complaint.

I will update you as soon as I can on resolving the other two requests for reconsideration once they are complete.

Thank you.

<image003.png>

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From: Kyle Moring <[redacted]>
Sent: Saturday, July 4, 2026 1:42 PM
To: Kent Richardson <Kent.Richardson@oag.texas.gov>
Cc: CrimPros Intake <crimprosintake@oag.texas.gov>
Subject: Re: PIA Complaint - City of Mount Pleasant

Mr. Richardson,

I am providing a brief supplemental update for awareness in connection with OAG File No. L260017200 and my pending Request for Revision materials.

Today, July 4, 2026, I filed a new Open Records Division complaint regarding the City of Mount Pleasant's failure to comply with ORD ruling **OR2026-018153 / ID No. 26-009561** concerning the Walmart Store #131 plan materials. The new complaint was assigned **OR-26-035644-IC**. The complaint concerns the City's failure to release the information ORD ruled must be released, and the absence of any production, cost estimate, withholding notice, or notice that the City has filed suit challenging the ruling.

I also want to note the recent ORD ruling issued on June 30, 2026, **OR2026-027532 / ID No. 26-020929**, concerning my request for records related to the 2024 cyber-theft/vendor-impersonation matter. In that ruling, ORD found that the City failed to comply with § 552.301 because it did not submit the requested information or a representative sample for review. ORD therefore ordered the requested information released under § 552.302.

I have separately sent the City an immediate production request regarding the records subject to **OR2026-027532 / ID No. 26-020929**, just as I have continued requesting compliance with **OR2026-018153 / ID No. 26-009561**. I am not attaching that separate City demand email here to avoid unnecessary duplication, but I can provide it upon request.

I also want to note two continuing issues. First, to my knowledge, the City/DTRG still has not notified me of, and I am not aware of, any Attorney General ruling request involving the DTRG correspondence request. The only PIA Decision Database entry I am presently aware of is **OR-26-020929-RR**, which concerns the vendor-impersonation/cyber-theft request, not the DTRG correspondence request.

Second, my access to the SharePoint/OneDrive folder that contained the Regulatory Agency Correspondence production remains unavailable to me, despite the City having charged and received more than $200 for that production.

I understand these ORD matters are procedurally separate from Criminal Prosecutions' § 552.3215 review. I am providing this update because they bear on the same broader issue raised in my Request for Revision: whether the City's production, withholding, ruling-request, access, and compliance representations can be accepted as accurate without verification.

Respectfully,

Kyle Moring
[redacted]

On Jul 2, 2026, at 3:21 PM, Kyle Moring <[redacted]> wrote:

Mr. Richardson,

I am providing a supplemental submission for the pending Request for Revision in OAG File No. L260017200.

On July 2, 2026, the OAG Public Information Coordinator's Office produced Open Records Division file materials in response to my public information request, PIR No. R032947. Those materials include signed Public Information Request Certification forms submitted by the City of Mount Pleasant to ORD. I had not previously received or reviewed those certification forms.

I have uploaded the supplemental materials to the shared Box folder in a folder titled:

09 – Seventh Supplement – City Certifications to ORD (PIR R032947)

The folder includes:

1. **00 – READ ME FIRST – City Certifications to ORD – PIR R032947 –** orientation document and contents map.
2. **00a – Supplemental Memo – City Certifications to ORD – L260017200 –** cross-references each City certification against the counter-evidence already submitted in the Request for Revision record.
3. **00b – Exhibit Binder – City Certifications to ORD – L260017200 –** the seven unique signed certification forms, the duplicate copy from the OR-25-034390-IC file, and ORD's November 10, 2025 closure letter.
4. **00c – File Manifest – Seventh Supplement –** file-level manifest for the supplemental materials.
5. **City Certifications to ORD Supplement – Combined Memo and Exhibits – L260017200 –** the controlling reading copy combining the memorandum and exhibits.
6. **01 – Individual Certification Pages –** the extracted certification / closure-letter pages as separate PDFs, each named by date, ORD file number, and source page.
7. **02 – Complete ORD Source Files (PIR R032947) –** the complete source files as produced by the OAG on July 2, 2026, including the OAG transmittal letter, so each extracted page can be verified against its source.

The memorandum cross-references the City's signed ORD certification forms against the counter-evidence already submitted in the Request for Revision repository. The issue is that seven unique City certifications appear in the ORD production, each executed by Candias Webster, and each selecting the option that the City had made available "all existing responsive information." Six of those certifications were signed on April 27, 2026, after I had already raised specific production omissions and search-completeness concerns.

I am submitting this as supplemental counter-evidence in support of my pending Request for Revision, not as a new standalone complaint. The certifications are directly relevant because ORD's own closure language and the May 22 determination relied on City representations that responsive information had been produced or was being produced. The newly obtained certification forms now allow those representations to be compared against later City records, third-party records, later City productions, and the City's own admissions.

I respectfully request that these certification materials be considered in evaluating whether the May 22 determination should be revised or supplemented to account for City certifications that appear materially disputed by records already provided to your office.

I am attaching the combined memorandum and exhibit packet for convenience. The README, file manifest, individual certification pages, and complete ORD source files are available in the Box folder referenced above.

Respectfully,

Kyle Moring
[redacted]

<City Certifications to ORD Supplement - Combined Memo and Exhibits - L260017200.pdf>

On Jun 12, 2026, at 9:05 AM, Kyle Moring <[redacted]> wrote:

Mr. Richardson,

I am providing two additional supplemental uploads for the pending Request for Revision in OAG File No. L260017200.

I am attaching email-size PDF reading copies of the two controlling documents for convenience. The Records Pickup / Ramirez PDF attached to this email has been compressed for transmission only; it is not intended to omit or alter content. The Box folders contain the full upload sets, including the controlling PDFs, standalone memo / exhibit-binder copies, and native/source files for verification.

The first is located in the Box folder titled:

07 - Fifth Supplement - September 26 Records Pickup and Ramirez Supervision Records

The controlling document is:

Records Pickup and Ramirez Records Supplement - Combined Memo and Exhibits 1-13 - L260017200.pdf

This supplement concerns the September 26, 2025 records-pickup transaction, contemporaneous cost objections made by email and during the recorded pickup, Ramirez supervision records later produced by TDLR but not by the City, and a later recurrence of related cost / inspection-access issues.

The second is located in the Box folder titled:

08 - Sixth Supplement - CRIMES RMS and Axon Repositories

The controlling document is:

CRIMES RMS and Axon Repositories Supplement - Combined Memo and Exhibits A-G - L260017200.pdf

This supplement concerns additional evidence regarding MPPD's records repositories and export capabilities, including CRIMES RMS and Axon / Evidence.com. I am providing it because those repositories appear relevant to the City's representations regarding production format, search completeness, claimed technical limitations, omitted repositories, and whether responsive records were searched in the correct systems.

For the Sixth Supplement, I also uploaded the file manifest identifying the supplemental materials and native/source files included for verification.

Neither supplement is submitted as a new standalone complaint. Both are provided as additional counter-evidence bearing on whether the City's representations can be accepted as accurate in connection with the pending Request for Revision.

The combined PDFs are the reading copies. I have also included supporting native/source files in the corresponding Box folders where available so your office can verify source records, metadata, routing, attachments, production format, and repository provenance if needed.

Respectfully,

Kyle Moring
[redacted]

<Records Pickup and Ramirez Records Supplement - Combined Memo and Exhibits 1-13 - L260017200.pdf>

<CRIMES RMS and Axon Repositories Supplement - Combined Memo and Exhibits A-G - L260017200.pdf>

On Jun 10, 2026, at 6:24 PM, Kyle Moring <[redacted]> wrote:

Mr. Richardson,

I am providing a supplemental combined memorandum and exhibit binder for the pending Request for Revision in OAG File No. L260017200.

This supplement concerns Certificate of Occupancy Permit **24-0581** for Walmart Store #131, 2311 S. Jefferson Avenue. The City's own records show that the permit existed: it appears in the September 2024 monthly Code/Building/Planning & Zoning report and in the City's aggregate permits issued index produced on October 22, 2025. However, the underlying permit record does not appear in the store-specific permit history productions I received.

This is relevant to the May 22 final determination because the determination relied in part on the City's representations that responsive information had been produced or was being produced. The missing CO permit is additional counter-evidence bearing on the accuracy of the City's completeness, no-records, permit history, and search-scope representations.

The omission appears most directly tied to my June 25, 2025 request for all building and roofing permits issued for Walmart Store #131. It also bears on the City's broader search-scope and repository-exclusion issues. I am not submitting this as a new standalone complaint.

I also note two continuing status issues. First, the City/DTRG has not notified me of, and I am not aware of, any Attorney General ruling request involving the DTRG correspondence request. The only PIA Decision Database entry I am presently aware of is **OR-26-020929-RR**, which concerns my records request for the 2024 cyber-theft/vendor-impersonation records, not the DTRG correspondence request. Second, my access to the SharePoint/OneDrive folder that contained the Regulatory Agency Correspondence production remains unavailable to me. These issues continue to bear on the City's representations regarding rolling production, pending ruling requests, and access to produced records.

I have also uploaded the following materials to the shared Box folder:

1. **00 - READ ME FIRST - Fourth Addendum**
2. **00 - READ ME FIRST - Missing CO Permit 24-0581**
3. **00a - Supplemental Memo - Missing CO Permit 24-0581 - Walmart 131 - L260017200**
4. **00b - Exhibit Binder - Missing CO Permit 24-0581 - L260017200**

5. The related native/source exhibit files for verification.

Respectfully,

Kyle Moring
[redacted]

<Missing CO Permit Supplement - Combined Memo and Exhibits 1-7 - L260017200.pdf>

On Jun 9, 2026, at 3:57 PM, Kyle Moring <[redacted]> wrote:

Mr. Richardson,

Attached is a supplemental combined memorandum and exhibit binder for the pending Request for Revision in OAG File No. L260017200.

This supplement concerns the City's September 18, 2025 representation that responsive inspection / SOP records could not be downloaded and therefore had to be printed and scanned. I am providing it because the City's own records appear to materially qualify or contradict that representation, including internal September 15 collection emails, later electronic and native production of responsive records, duplicate paper charges for records already produced electronically, the March 10, 2026 Microsoft Purview / native export response, and DSHS-produced native City communications involving the same Walmart inspection matter.

This is not submitted as a new standalone complaint. It is supplemental counter-evidence regarding whether the City's representations about production format, claimed technical limitations, native export, and completeness can be accepted as accurate.

The combined PDF is a reading copy. I have also uploaded the READ ME file and supporting native .msg / .eml source files in the same Box folder so your office can independently verify headers, attachments, routing metadata, and source-record provenance.

Respectfully,

Kyle Moring
[redacted]

<Print-to-Scan Supplement - Combined Memo and Exhibits A-I - L260017200.pdf>

On Jun 8, 2026, at 3:35 PM, Kyle Moring <[redacted]> wrote:

Mr. Richardson,

I am providing a brief status update regarding the mandamus action against the City of Mount Pleasant.

Attached is an email I received from the 76th/276th Judicial District Court Coordinator advising that the local judges are recusing from the case because it involves the City of Mount Pleasant, and that the matter is awaiting assignment from the Regional Judges' office to a visiting judge.

I will provide the assigned judge information, signed orders, and any other relevant court filings once available.

Respectfully,

Kyle Moring
[redacted]

<2026-06-08 - Titus County - Mandamus Update - Visiting Judge Assignment Pending (Kelli Rumbo).pdf>

On Jun 7, 2026, at 10:53 AM, Kyle Moring <[redacted]> wrote:

Mr. Richardson,

I have uploaded my **Second Supplement to Formal Complaint – City of Mount Pleasant – DSHS-Produced City Communications Not Produced or Accounted for in the Relevant City Productions to the OAG Box** shared folder for association with my pending Public Information Act complaint and Request for Revision concerning the City of Mount Pleasant (determination dated May 22, 2026; OAG File L260017200). The supplement is a new, self-contained subfolder within the same Box folder previously provided to your office, titled "**04 - Second Supplement (DSHS-Produced City Communications)**." The previously submitted materials (folders 00 through 03) remain in place, unchanged.

Please treat the contents of the "04" subfolder as the operative supplemental submission. I am not attaching duplicate copies to this email to avoid version-control issues.

The uploaded folder includes:

- 00 – READ ME
- 00a – Second Supplement to Formal Complaint (Letter to OAG) (6 pp., bookmarked)
- 00b – Exhibit Crosswalk, DSHS Production Chronology, and Request-to-Record Mapping (5 pp.)
- 00c – Production-Set Verification Memorandum, with executed declaration under Tex. Civ. Prac. & Rem. Code § 132.001 (3 pp.)
- 00d – Exhibit Binder (Compiled) (72 pp., bookmarked for navigation)
- 00e – Native File Manifest (1 p.)
- Exhibits 1–18 (individual PDFs)
- Native Files folder (native .msg, .ics, and .eml files and the extracted Notice attachment, with manifest copies)

The supplement is submitted under the May 22, 2026 determination's reservation that the determination is subject to revision upon receipt of new, relevant, and persuasive information. The submission identifies DSHS-produced records and