Court USB production (August 28, 2026) · thread T60

Feb. 18 Meeting Packet Request ? TPIA Search Methodology and IT Export Capability

10 message(s), 2026-02-10 · 2026-02-27. Public copy: personal contact details and excluded-subject material boxed.

1. 2026-02-10 03:36 Kyle Moring · 0 att.
2. 2026-02-25 21:35 Candias Webster · 0 att.
3. 2026-02-25 23:56 Kyle Moring · 0 att.
4. 2026-02-26 13:06 Candias Webster · 0 att.
5. 2026-02-26 13:16 Wesley Lyon · 0 att.
6. 2026-02-26 14:35 Candias Webster · 0 att.
7. 2026-02-26 17:29 Candias Webster · 1 att.
8. 2026-02-26 22:37 Kyle Moring · 0 att.
9. 2026-02-27 18:40 Candias Webster · 0 att.
10. 2026-02-27 19:12 Kyle Moring · 0 att.

From:	Kyle Moring <[redacted]>
To:	Candias Webster <cwebster@mpcity.org>
Cc:	Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <Wlyon@mpcity.org>; chinton@mpcity.org; dcorbell@mpcity.org; kredfearn@mpcity.org; jhageman@mpcity.org; Melanie.knight@mpcity.org; [redacted]
Date:	2026-02-10 03:36:51+00:00
Subject:	**Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	—
USB file:	Feb.msg

Report This Email

Good evening,

Ahead of the February 18, 2026 meeting with Mayor Lyon, Mayor Pro Tem Hinton, and Rob Vine, I am requesting that the City have available (and, where feasible, provide to me in advance) documentation sufficient to show how the City has been conducting and documenting searches for my Texas Public Information Act requests.

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3. If the City contends any system can only be produced via "print-to-scan," the system name/vendor and any existing record describing that limitation.

If the City does not maintain any logs, export reports, audit trails, or time entries reflecting these items, please confirm that in writing and be prepared to describe the City's standard search workflow at the meeting.

Timing/delivery

If possible, please provide the above packet electronically to [redacted] by February 16, 2026, so I can review it before the meeting. If that is not feasible, please confirm that the City will have the materials available for review at the meeting.

To the extent the City treats any portion of this email as a new request for records under Chapter 552, please process it accordingly and provide any required written cost estimate before incurring charges.

With gratitude,

Kyle Moring

[redacted]

From:	Candias Webster <cwebster@mpcity.org>
To:	Kyle Moring <[redacted]>
Cc:	Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; "[redacted]" <[redacted]>
Date:	2026-02-25 21:35:21+00:00
Subject:	**RE: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	—
USB file:	RE Feb_17.msg (+1 identical copies)

Report This Email

Good afternoon, Mr. Moring,

Please responses to your request.

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B. The City does not maintain records responsive to this portion of your request. The City is obligated under state law to process open records requests by searching for any and all responsive records; however, the absence of evidence of a particular search for responsive information does not constitute evidence of absence of a particular search for responsive information, given the City's legal obligations under state law with regard to open records requests.

C. The City does not possess any records responsive to this portion of your request.

This request is closed as of today, February 25, 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: Monday, February 9, 2026 9:37 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted]
Subject: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

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This request is focused on transparency and resolution. I am not asking the City to create new information or perform legal research; rather, I am requesting copies of any existing records maintained in the ordinary course that reflect search scope, search parameters, and processing steps.

A. Search scope and parameters – records sufficient to show what was done

For the following requests (or, if the City prefers, for the subset of requests the City contends are most disputed), please have available and/or provide copies of any existing records reflecting:

1. Custodians/accounts searched (including shared mailboxes), and whether MPPD custodians/accounts were included.

2. Systems searched (active email system; any email archive/eDiscovery platform; shared drives/SharePoint/OneDrive or other repositories, as applicable).

3. Date ranges applied.

4. Exact search parameters executed (keywords, domain filters, sender/recipient filters, attachment searching settings), including screenshots, export reports, or audit logs if maintained.

5. Who performed/supervised the search (name and title), and any time entries or task notes maintained in the ordinary course, showing time spent on search/export versus review/redaction.

B. "No responsive records" and "previously furnished" certifications – support for adequacy

For any request where the City issued a "no responsive records" response or a Gov't Code § 552.232(b) "previously furnished" certification, please have available the internal records (if any) showing that the City made a good-faith effort to relate the request to the information the City holds (e.g., custodian outreach emails, request-routing logs, or search/export reports).

C. IT/export capability documentation (including "print-to-scan" claims)

Please have available any existing documentation (vendor manuals, SOPs, screenshots, system capability summaries, or IT tickets/notes) sufficient to identify:

1. The principal systems used by the City (and MPPD, if applicable) for email, archiving/eDiscovery, permitting/building, code enforcement, fire, health/inspections, utilities, and accounts payable.

2. Whether those systems have native electronic export capability (e.g., .pst/.eml/.msg exports, PDF exports, CSV exports).

3. If the City contends any system can only be produced via "print-to-scan," the system name/vendor and any existing record describing that limitation.

If the City does not maintain any logs, export reports, audit trails, or time entries reflecting these items, please confirm that in writing and be prepared to describe the City's standard search workflow at the meeting.

Timing/delivery

If possible, please provide the above packet electronically to [redacted] by February 16, 2026, so I can review it before the meeting. If that is not feasible, please confirm that the City will have the materials available for review at the meeting.

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[redacted]

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To:	Candias Webster <cwebster@mpcity.org>
Cc:	Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; "[redacted]" <[redacted]>
Date:	2026-02-25 23:56:57+00:00
Subject:	**Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	—
USB file:	Re Feb_12.msg

Report This Email

Ms. Webster,

Thank you for your email responding to my “Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability.” In your response, you state that the City does not possess or maintain records responsive to items 1–3 and that the request is “closed” as of February 25, 2026. I am writing to ensure I understand the City’s position correctly and to request that the City reconsider and conduct an additional search, because the City’s response appears inconsistent with information communicated by City officials during our February 18, 2026 meeting.

1. **Item 1 – Search scope and parameters (records reflecting what was done)**

Your response indicates the City does not possess records reflecting custodians/accounts searched, systems searched, date ranges applied, exact search strings/filters executed, or who performed/supervised the searches. During the February 18 meeting, City officials described the search workflow in a manner suggesting that, in the ordinary course, there may be records reflecting request routing and search execution (for example: emails/messages transmitting search terms and date ranges to IT; help-desk tickets or work orders; screenshots; export reports; audit logs; or similar).

Please reopen the request and conduct a search reasonably calculated to locate any such records, including records maintained by IT and any internal communications between the City Secretary’s office and IT relating to the searches performed for my requests.

2. **Item 2 – “No responsive records” / “previously furnished” determinations (records reflecting the workflow)**

Your response states that “the absence of evidence of a particular search … does not constitute evidence of absence of a particular search.” I understand the distinction, but it does not address what I requested. I did not ask the City to prove that a search occurred; I requested any existing records that reflect how searches were routed and conducted, particularly where the City issued “no responsive records” responses or “previously furnished” certifications.

If the City maintains any records reflecting that workflow—custodian outreach emails, request-routing logs, internal notes, tickets, screenshots, export reports, or similar—please produce them. If the City maintains no such records, please confirm that the City does not create or retain any documentation of search execution (including request-routing communications, tickets, screenshots, export logs, or audit trails) in the ordinary course.

3. **Item 3 – IT/export capability documentation (records reflecting system capabilities)**

Your response states the City does not possess records regarding IT/export capability or any “print-to-scan” limitation. This is difficult to square with the City’s use of vendor systems that typically include manuals, administrator guides, SOPs, and other documentation, and with prior representations regarding the City’s export capabilities.

Please reopen the request and search for any responsive records, including vendor documentation, internal SOPs, system administration records, IT tickets/notes, or staff communications regarding export functionality for the systems used for email, archiving/eDiscovery (if any), permitting/building, code enforcement, health/inspections, utilities, and accounts payable.

February 18 meeting recording and transcript

At the February 18, 2026 meeting, Mayor Lyon stated the City was recording the meeting and that the recording would be shared and transcribed. I have not received either. Please confirm when the City will provide the recording and any transcript. If no transcript exists, please confirm that in writing. Please treat this paragraph as a request for public information under Chapter 552 for any recording, transcript, notes, or other records memorializing the February 18, 2026 meeting that are maintained by the City.

For these reasons, I do not consider this request closed. I respectfully ask that the City reopen it and conduct an additional search reasonably calculated to locate any responsive records described above. If additional clarification would be helpful, I am available to provide it.

With gratitude,

Kyle Moring

[redacted] | [redacted]

> On Feb 25, 2026, at 3:35 PM, Candias Webster <cwebster@mpcity.org> wrote:

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Assistant City Manager/ City Secretary
City of Mt. Pleasant
Office: 903-575-4000
Cell: [redacted]
Fax: 903-577-1828

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Sent: Monday, February 9, 2026 9:37 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted]
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[redacted] | [redacted]

From:	Candias Webster
To:	Wesley Lyon <wlyon@mpcity.org>
Cc:	Lea Ream <lream@dtrglaw.com>; Austin Beck <abeck@dtrglaw.com>
Date:	2026-02-26 13:06:29.064321+00:00
Subject:	**FW: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	—
USB file:	FW Feb_2.msg

Good morning, Mayor,

Can you please send me the recording from the meeting you had with Mr. Moring?

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Subject: Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

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From:	Wesley Lyon <wlyon@mpcity.org>
To:	Candias Webster <cwebster@mpcity.org>
Cc:	Lea Ream <lream@dtrglaw.com>; Austin Beck <abeck@dtrglaw.com>
Date:	2026-02-26 13:16:54.542210+00:00
Subject:	**Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	—
USB file:	Re Feb_2.msg

Here you go I was reading it and it doesn’t look very accurate in some place

Thanks

Mayor

[City auto-transcript of the February 18, 2026 meeting omitted · the reviewed recording and transcript are on the Recordings page]

Pages 14-16 of this thread copy omitted.

City auto-transcript of the February 18, 2026 meeting (Mayor Lyon forward of Feb 26) - omitted; the reviewed recording and transcript with approved boundaries are on the Recordings page

[City auto-transcript of the February 18, 2026 meeting omitted · see Recordings page]

From: Candias Webster <cwebster@mpcity.org>
Sent: Thursday, February 26, 2026 7:06 AM
To: Wesley Lyon <wlyon@mpcity.org>
Cc: Lea Ream <lream@dtrglaw.com>; Austin Beck <abeck@dtrglaw.com>
Subject: FW: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

Report This Email

Good morning, Mayor,

Can you please send me the recording from the meeting you had with Mr. Moring?

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, February 25, 2026 5:57 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted]
Subject: Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

Ms. Webster,

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1. **Item 1 – Search scope and parameters (records reflecting what was done)**

Your response indicates the City does not possess records reflecting custodians/accounts searched, systems searched, date ranges applied, exact search strings/filters executed, or who performed/supervised the searches. During the February 18 meeting, City officials described the search workflow in a manner suggesting that, in the ordinary course, there may be records reflecting request routing and search execution (for example: emails/messages transmitting search terms and date ranges to IT; help-desk tickets or work orders; screenshots; export reports; audit logs; or similar).

Please reopen the request and conduct a search reasonably calculated to locate any such records, including records maintained by IT and any internal communications between the City Secretary's office and IT relating to the searches performed for my requests.

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recording, transcript, notes, or other records memorializing the February 18, 2026 meeting that are maintained by the City.

For these reasons, I do not consider this request closed. I respectfully ask that the City reopen it and conduct an additional search reasonably calculated to locate any responsive records described above. If additional clarification would be helpful, I am available to provide it.

With gratitude,

Kyle Moring

[redacted] | [redacted]

On Feb 25, 2026, at 3:35 PM, Candias Webster <cwebster@mpcity.org> wrote:

Good afternoon, Mr. Moring,

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B. The City does not maintain records responsive to this portion of your request. The City is obligated under state law to process open records requests by searching for any and all responsive records; however, the absence of evidence of a particular search for responsive information does not constitute evidence of absence of a particular search for responsive information, given the City's legal obligations under state law with regard to open records requests.

C. The City does not possess any records responsive to this portion of your request.

This request is closed as of today, February 25, 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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Subject: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

Good evening,

Ahead of the February 18, 2026 meeting with Mayor Lyon, Mayor Pro Tem Hinton, and Rob Vine, I am requesting that the City have available (and, where feasible, provide to me in advance) documentation sufficient to show how the City has been

conducting and documenting searches for my Texas Public Information Act requests.

This request is focused on transparency and resolution. I am not asking the City to create new information or perform legal research; rather, I am requesting copies of any existing records maintained in the ordinary course that reflect search scope, search parameters, and processing steps.

A. Search scope and parameters – records sufficient to show what was done

For the following requests (or, if the City prefers, for the subset of requests the City contends are most disputed), please have available and/or provide copies of any existing records reflecting:

1. Custodians/accounts searched (including shared mailboxes), and whether MPPD custodians/accounts were included.

2. Systems searched (active email system; any email archive/eDiscovery platform; shared drives/SharePoint/OneDrive or other repositories, as applicable).

3. Date ranges applied.

4. Exact search parameters executed (keywords, domain filters, sender/recipient filters, attachment searching settings), including screenshots, export reports, or audit logs if maintained.

5. Who performed/supervised the search (name and title), and any time entries or task notes maintained in the ordinary course, showing time spent on search/export versus review/redaction.

B. "No responsive records" and "previously furnished" certifications – support for adequacy

For any request where the City issued a "no responsive records" response or a Gov't Code § 552.232(b) "previously furnished" certification, please have available the internal records (if any) showing that the City made a good-faith effort to relate the request to the information the City holds (e.g., custodian outreach emails, request-routing logs, or search/export reports).

C. IT/export capability documentation (including "print-to-scan" claims)

Please have available any existing documentation (vendor manuals, SOPs, screenshots, system capability summaries, or IT tickets/notes) sufficient to identify:

1. The principal systems used by the City (and MPPD, if applicable) for email, archiving/eDiscovery, permitting/building, code enforcement, fire, health/inspections, utilities, and accounts payable.

2. Whether those systems have native electronic export capability (e.g., .pst/.eml/.msg exports, PDF exports, CSV exports).

3. If the City contends any system can only be produced via "print-to-scan," the system name/vendor and any existing record describing that limitation.

If the City does not maintain any logs, export reports, audit trails, or time entries reflecting these items, please confirm that in writing and be prepared to describe the City's standard search workflow at the meeting.

Timing/delivery

If possible, please provide the above packet electronically to [redacted] by February 16, 2026, so I can review it before the meeting. If that is not feasible, please confirm that the City will have the materials available for review at the meeting.

To the extent the City treats any portion of this email as a new request for records under Chapter 552, please process it accordingly and provide any required written cost estimate before incurring charges.

With gratitude,

Kyle Moring

[redacted] | [redacted]

From:	Candias Webster
To:	Wesley Lyon <wlyon@mpcity.org>
Cc:	Lea Ream <lream@dtrglaw.com>; Austin Beck <abeck@dtrglaw.com>
Date:	2026-02-26 14:35:29.630019+00:00
Subject:	**RE: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	—
USB file:	RE Feb_7.msg

Mayor,

Do you have a copy of the recording also, that I can send 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: Wesley Lyon <wlyon@mpcity.org>
Sent: Thursday, February 26, 2026 7:17 AM
To: Candias Webster <cwebster@mpcity.org>
Cc: Lea Ream <lream@dtrglaw.com>; Austin Beck <abeck@dtrglaw.com>
Subject: Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

[City auto-transcript of the February 18, 2026 meeting omitted · see Recordings page]

Pages 22-27 of this thread copy omitted.

City auto-transcript of the February 18, 2026 meeting (Webster forward of Feb 26) - omitted; see Recordings page

From: Candias Webster <cwebster@mpcity.org>
Sent: Thursday, February 26, 2026 7:06 AM
To: Wesley Lyon <wlyon@mpcity.org>
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Subject: FW: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

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Subject: Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

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With gratitude,

Kyle Moring

[redacted]

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C. The City does not possess any records responsive to this portion of your request.

This request is closed as of today, February 25, 2026.

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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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Sent: Monday, February 9, 2026 9:37 PM
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Subject: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

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3. Date ranges applied.

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Kyle Moring

[redacted] | [redacted]

From:	Candias Webster <cwebster@mpcity.org>
To:	Kyle Moring <[redacted]>
Cc:	Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; "[redacted]" <[redacted]>
Date:	2026-02-26 17:29:37+00:00
Subject:	**RE: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	image001.png
USB file:	RE Feb_10.msg (+1 identical copies)

Report This Email

Mr. Morning,

Please see the link to the meeting transcript and recording.

February 18 Meeting

This request is closed 02/26/2026

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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Kyle Moring

[redacted] | [redacted]

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Fax: 903-577-1828

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From: Kyle Moring <[redacted]>
Sent: Monday, February 9, 2026 9:37 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted]
Subject: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

Good evening,

Ahead of the February 18, 2026 meeting with Mayor Lyon, Mayor Pro Tem Hinton, and Rob Vine, I am requesting that the City have available (and, where feasible, provide to me in advance) documentation sufficient to show how the City has been conducting and documenting searches for my Texas Public Information Act requests.

This request is focused on transparency and resolution. I am not asking the City to create new information or perform legal research; rather, I am requesting copies of any existing records maintained in the ordinary course that reflect search scope, search parameters, and processing steps.

A. Search scope and parameters – records sufficient to show what was done

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1. Custodians/accounts searched (including shared mailboxes), and whether MPPD custodians/accounts were included.

2. Systems searched (active email system; any email archive/eDiscovery platform; shared drives/SharePoint/OneDrive or other repositories, as applicable).

3. Date ranges applied.

4. Exact search parameters executed (keywords, domain filters, sender/recipient filters, attachment searching settings), including screenshots, export reports, or audit logs if maintained.

5. Who performed/supervised the search (name and title), and any time entries or task notes maintained in the ordinary course, showing time spent on search/export versus review/redaction.

B. "No responsive records" and "previously furnished" certifications – support for adequacy

For any request where the City issued a "no responsive records" response or a Gov't Code § 552.232(b) "previously furnished" certification, please have available the internal records (if any) showing that the City made a good-faith effort to relate the request to the information the City holds (e.g., custodian outreach emails, request-routing logs, or search/export reports).

C. IT/export capability documentation (including "print-to-scan" claims)

Please have available any existing documentation (vendor manuals, SOPs, screenshots, system capability summaries, or IT tickets/notes) sufficient to identify:

1. The principal systems used by the City (and MPPD, if applicable) for email, archiving/eDiscovery, permitting/building, code enforcement, fire, health/inspections, utilities, and accounts payable.

2. Whether those systems have native electronic export capability (e.g., .pst/.eml/.msg exports, PDF exports, CSV exports).

3. If the City contends any system can only be produced via "print-to-scan," the system name/vendor and any existing record describing that limitation.

If the City does not maintain any logs, export reports, audit trails, or time entries reflecting these items, please confirm that in writing and be prepared to describe the City's standard search workflow at the meeting.

Timing/delivery

If possible, please provide the above packet electronically to [redacted] by February 16, 2026, so I can review it before the meeting. If that is not feasible, please confirm that the City will have the materials available for review at the meeting.

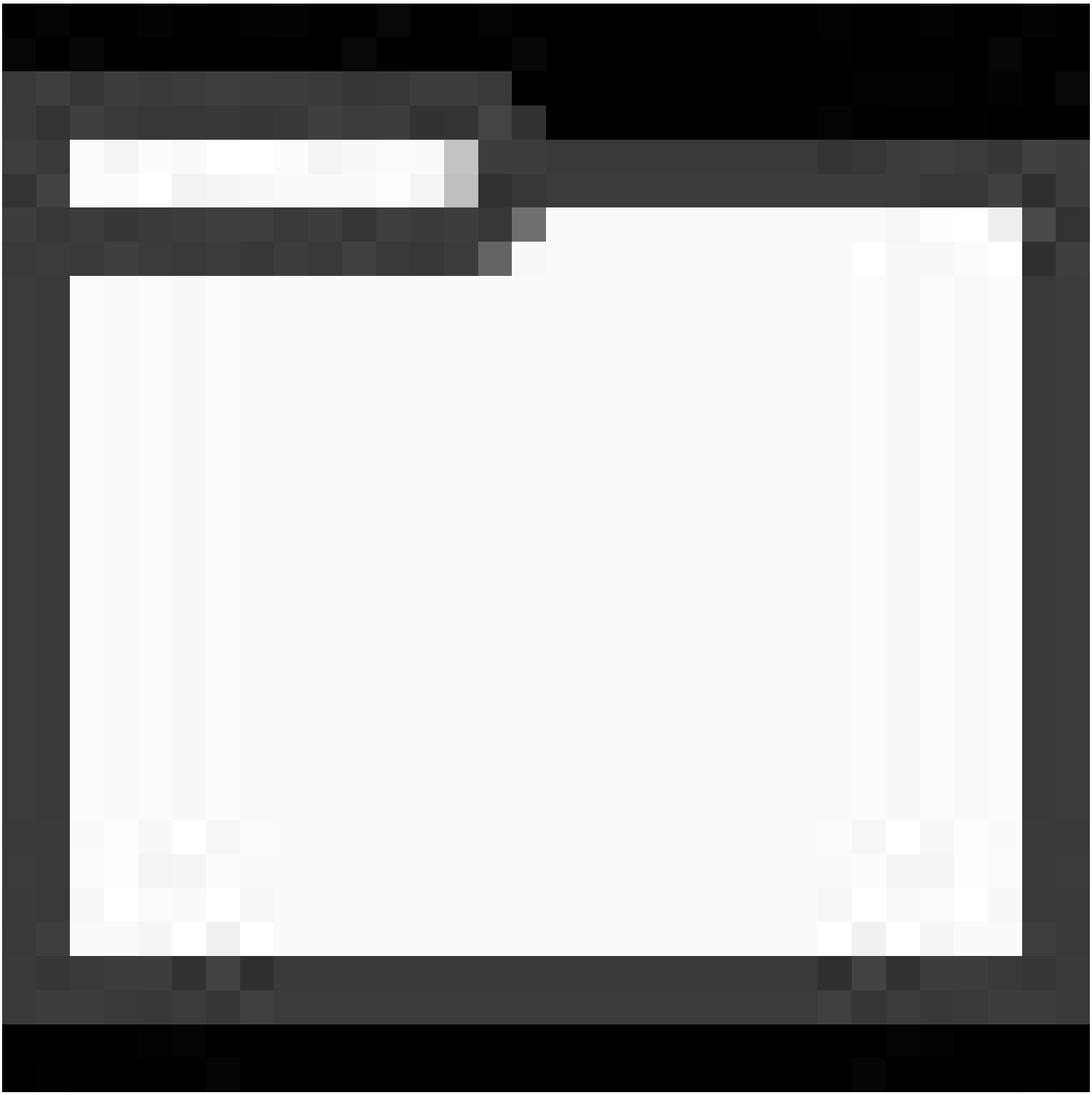
To the extent the City treats any portion of this email as a new request for records under Chapter 552, please process it accordingly and provide any required written cost estimate before incurring charges.

With gratitude,

Kyle Moring

[redacted] | [redacted]

Attachment: image001.png



From:	Kyle Moring <[redacted]>
To:	Candias Webster <cwebster@mpcity.org>
Cc:	Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; "[redacted]" <[redacted]>
Date:	2026-02-26 22:37:53+00:00
Subject:	**Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	—
USB file:	Re Feb_1.msg

Report This Email

Ms. Webster,

Thank you for providing a link to the City's recording and transcript of the February 18, 2026 meeting. I appreciate the production. However, I have concerns regarding **(1)** the apparent completeness and provenance of the recording and transcript, and **(2)** the City's continued position that the substantive portions of my request (Items 1–3) are closed.

1. Apparent incompleteness of the recording and transcript

The transcript provided ends abruptly mid-conversation. Based on my recollection, the meeting continued for a material period after the point where the transcript ends, including discussion directly relevant to this request (including, among other topics, the City's search workflow, IT involvement, and system limitations affecting export/searchability).

The audio file provided is approximately 57 minutes and 26 seconds long. In addition, the file properties displayed on my system reflect a creation date of February 26, 2026 (the date of production), rather than February 18, 2026 (the meeting date). I understand file properties can change when a file is copied, converted, or re-exported; however, this discrepancy raises questions about whether the City produced the original, complete recording.

Please confirm, in writing:

- What device/application was used to record the February 18, 2026 meeting, and who operated it (name and title)
- Whether the recording stopped during the meeting (and if so, when and why), or whether it was intentionally stopped before the meeting concluded
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If the City possesses the original, complete recording, please produce the complete, unedited file in its native format with intact metadata. If the City's recording is incomplete, please state that clearly in writing and explain why.

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3. Items 1–3 remain outstanding

Your February 26, 2026 production provides the meeting recording and transcript and declares the request "closed." However, my request is not limited to the recording. It seeks records responsive to Items 1–3: **(1)** search scope and parameters used to process my TPIA requests; **(2)** workflow records underlying "no responsive records" and "previously furnished" determinations; and **(3)** IT/export capability documentation (including any records supporting "print-to-scan" limitations).

Your February 25, 2026 response stated that no responsive records exist for Items 1–3. My follow-up explained why that position is difficult to reconcile with what City officials described at the February 18, 2026 meeting and requested that the City reopen and conduct additional searches reasonably calculated to locate any responsive records maintained in the ordinary course (e.g., internal emails/messages, tickets/work orders, export reports, audit logs, screenshots, or vendor documentation).

For the avoidance of doubt: I do not consider Items 1–3 closed. I renew my request that the City reopen and conduct additional searches reasonably calculated to locate responsive records for each item and produce any responsive information located.

4. Preservation and next steps

Please preserve all recordings, transcripts, notes (including any handwritten notes referenced during the meeting), drafts, and internal communications related to **(a)** the February 18, 2026 meeting and **(b)** the processing of this request, consistent with my prior preservation notice.

If the City maintains its position that no responsive records exist for Items 1–3, or if the City cannot produce the complete original meeting recording (or identify whether additional recordings exist), I will treat that as a basis for an additional complaint to the Office of the Attorney General.

If additional clarification would be helpful, I am available to provide it.

With gratitude,

Kyle Moring

[redacted] | [redacted]

On Feb 26, 2026, at 11:29 AM, Candias Webster <cwebster@mpcity.org> wrote:

Mr. Morning,

Please see the link to the meeting transcript and recording.

<image001.png> February 18 Meeting

This request is closed 02/26/2026

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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To: Candias Webster <cwebster@mpcity.org>
Cc: Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted]
Subject: Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

Ms. Webster,

Thank you for your email responding to my "Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability." In your response, you state that the City does not possess or maintain records responsive to items 1–3 and that the request is "closed" as of February 25, 2026. I am writing to ensure I understand the City's position correctly and to request that the City reconsider and conduct an additional search, because the City's response appears inconsistent with information communicated by City officials during our February 18, 2026 meeting.

1. **Item 1 – Search scope and parameters (records reflecting what was done)**

Your response indicates the City does not possess records reflecting custodians/accounts searched, systems searched, date ranges applied, exact search strings/filters executed, or who performed/supervised the searches. During the February 18 meeting, City officials described the search workflow in a manner suggesting that, in the ordinary course, there may be

records reflecting request routing and search execution (for example: emails/messages transmitting search terms and date ranges to IT; help-desk tickets or work orders; screenshots; export reports; audit logs; or similar).

Please reopen the request and conduct a search reasonably calculated to locate any such records, including records maintained by IT and any internal communications between the City Secretary's office and IT relating to the searches performed for my requests.

2. Item 2 – "No responsive records" / "previously furnished" determinations (records reflecting the workflow)

Your response states that "the absence of evidence of a particular search … does not constitute evidence of absence of a particular search." I understand the distinction, but it does not address what I requested. I did not ask the City to prove that a search occurred; I requested any existing records that reflect how searches were routed and conducted, particularly where the City issued "no responsive records" responses or "previously furnished" certifications.

If the City maintains any records reflecting that workflow—custodian outreach emails, request-routing logs, internal notes, tickets, screenshots, export reports, or similar—please produce them. If the City maintains no such records, please confirm that the City does not create or retain any documentation of search execution (including request-routing communications, tickets, screenshots, export logs, or audit trails) in the ordinary course.

3. Item 3 – IT/export capability documentation (records reflecting system capabilities)

Your response states the City does not possess records regarding IT/export capability or any "print-to-scan" limitation. This is difficult to square with the City's use of vendor systems that typically include manuals, administrator guides, SOPs, and other documentation, and with prior representations regarding the City's export capabilities.

Please reopen the request and search for any responsive records, including vendor documentation, internal SOPs, system administration records, IT tickets/notes, or staff communications regarding export functionality for the systems used for email, archiving/eDiscovery (if any), permitting/building, code enforcement, health/inspections, utilities, and accounts payable.

February 18 meeting recording and transcript

At the February 18, 2026 meeting, Mayor Lyon stated the City was recording the meeting and that the recording would be shared and transcribed. I have not received either. Please confirm when the City will provide the recording and any transcript. If no transcript exists, please confirm that in writing. Please treat this paragraph as a request for public information under Chapter 552 for any recording, transcript, notes, or other records memorializing the February 18, 2026 meeting that are maintained by the City.

For these reasons, I do not consider this request closed. I respectfully ask that the City reopen it and conduct an additional search reasonably calculated to locate any responsive records described above. If additional clarification would be helpful, I am available to provide it.

With gratitude,

Kyle Moring

[redacted] | [redacted]

On Feb 25, 2026, at 3:35 PM, Candias Webster <cwebster@mpcity.org> wrote:

Good afternoon, Mr. Moring,

Please responses to your request.

A. When the City receives an open records request that includes specific date ranges and/or keywords, City staff search through City records using the date range and/or keywords provided by the requestor. The City does not possess any records responsive to this portion of your request.

B. The City does not maintain records responsive to this portion of your request. The City is obligated under state law to process open records requests by searching for any and all responsive records; however, the absence of evidence of a particular search for responsive information does not constitute evidence of absence of a particular search for responsive information, given the City's legal obligations under state law with regard to open records requests.

C. The City does not possess any records responsive to this portion of your request.

This request is closed as of today, February 25, 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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Subject: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

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A. Search scope and parameters – records sufficient to show what was done

For the following requests (or, if the City prefers, for the subset of requests the City contends are most disputed), please have available and/or provide copies of any existing records reflecting:

1. Custodians/accounts searched (including shared mailboxes), and whether MPPD custodians/accounts were included.

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5. Who performed/supervised the search (name and title), and any time entries or task notes maintained in the ordinary course, showing time spent on search/export versus review/redaction.

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If possible, please provide the above packet electronically to [redacted] by February 16, 2026, so I can review it before the meeting. If that is not feasible, please confirm that the City will have the materials available for review at the meeting.

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With gratitude,

Kyle Moring

[redacted] | [redacted]

From:	Candias Webster
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Cc:	Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted] <[redacted]>
Date:	2026-02-27 18:40:40.446472+00:00
Subject:	**RE: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	—
USB file:	RE Feb_3.msg

Good afternoon, Mr. Moring,

Please see the response to your request

- **Transcript quality, lack of attribution, and apparent errors.** This is the only transcript and recording I have.
- **Items 1–3 remain outstanding – I certify the City does not possess any information responsive to this request as we use the keywords you provide in your TPIA's.**

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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Kyle Moring

[redacted] | [redacted]

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> **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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Subject: Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

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Please reopen the request and conduct a search reasonably calculated to locate any such records, including records maintained by IT and any internal communications between the City Secretary's office and IT relating to the searches performed for my requests.

2. **Item 2 – "No responsive records" / "previously furnished" determinations (records reflecting the workflow)**

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If the City maintains any records reflecting that workflow—custodian outreach emails, request-routing logs, internal notes, tickets, screenshots, export reports, or similar—please produce them. If the City maintains no such records, please confirm that the City does not create or retain any documentation of search execution (including request-routing communications, tickets, screenshots, export logs, or audit trails) in the ordinary course.

3. **Item 3 – IT/export capability documentation (records reflecting system capabilities)**

Your response states the City does not possess records regarding IT/export capability or any "print-to-scan" limitation. This is difficult to square with the City's use of vendor systems that typically include manuals, administrator guides, SOPs, and other documentation, and with prior representations regarding the City's export capabilities.

Please reopen the request and search for any responsive records, including vendor documentation, internal SOPs, system administration records, IT tickets/notes, or staff communications regarding export functionality for the systems used for email, archiving/eDiscovery (if any), permitting/building, code enforcement, health/inspections, utilities, and accounts payable.

February 18 meeting recording and transcript

At the February 18, 2026 meeting, Mayor Lyon stated the City was recording the meeting and that the recording would be shared and transcribed. I have not received either. Please confirm when the City will provide the recording and any transcript. If no transcript exists, please confirm that in writing. Please treat this paragraph as a request for public information under Chapter 552 for any recording, transcript, notes, or other records memorializing the February 18, 2026

meeting that are maintained by the City.

For these reasons, I do not consider this request closed. I respectfully ask that the City reopen it and conduct an additional search reasonably calculated to locate any responsive records described above. If additional clarification would be helpful, I am available to provide it.

With gratitude,

Kyle Moring

[redacted] | [redacted]

On Feb 25, 2026, at 3:35 PM, Candias Webster <cwebster@mpcity.org> wrote:

Good afternoon, Mr. Moring,

Please responses to your request.

A. When the City receives an open records request that includes specific date ranges and/or keywords, City staff search through City records using the date range and/or keywords provided by the requestor. The City does not possess any records responsive to this portion of your request.

B. The City does not maintain records responsive to this portion of your request. The City is obligated under state law to process open records requests by searching for any and all responsive records; however, the absence of evidence of a particular search for responsive information does not constitute evidence of absence of a particular search for responsive information, given the City's legal obligations under state law with regard to open records requests.

C. The City does not possess any records responsive to this portion of your request.

This request is closed as of today, February 25, 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: Monday, February 9, 2026 9:37 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted]
Subject: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

Good evening,

Ahead of the February 18, 2026 meeting with Mayor Lyon, Mayor Pro Tem Hinton, and Rob Vine, I am requesting that the City have available (and, where feasible, provide to me in advance) documentation sufficient to show how the City has been conducting and documenting searches for my Texas Public Information Act requests.

This request is focused on transparency and resolution. I am not asking the City to create new information or perform legal research; rather, I am requesting copies of any existing records maintained in the ordinary course that reflect search scope, search parameters, and processing steps.

A. Search scope and parameters – records sufficient to show what was done

For the following requests (or, if the City prefers, for the subset of requests the City contends are most disputed), please have available and/or provide copies of any existing records reflecting:

1. Custodians/accounts searched (including shared mailboxes), and whether MPPD custodians/accounts were included.

2. Systems searched (active email system; any email archive/eDiscovery platform; shared drives/SharePoint/OneDrive or other repositories, as applicable).

3. Date ranges applied.

4. Exact search parameters executed (keywords, domain filters, sender/recipient filters, attachment searching settings), including screenshots, export reports, or audit logs if maintained.

5. Who performed/supervised the search (name and title), and any time entries or task notes maintained in the ordinary course, showing time spent on search/export versus review/redaction.

B. "No responsive records" and "previously furnished" certifications – support for adequacy

For any request where the City issued a "no responsive records" response or a Gov't Code § 552.232(b) "previously furnished" certification, please have available the internal records (if any) showing that the City made a good-faith effort to relate the request to the information the City holds (e.g., custodian outreach emails, request-routing logs, or search/export reports).

C. IT/export capability documentation (including "print-to-scan" claims)

Please have available any existing documentation (vendor manuals, SOPs, screenshots, system capability summaries, or IT tickets/notes) sufficient to identify:

1. The principal systems used by the City (and MPPD, if applicable) for email, archiving/eDiscovery, permitting/building, code enforcement, fire, health/inspections, utilities, and accounts payable.

2. Whether those systems have native electronic export capability (e.g., .pst/.eml/.msg exports, PDF exports, CSV exports).

3. If the City contends any system can only be produced via "print-to-scan," the system name/vendor and any existing record describing that limitation.

If the City does not maintain any logs, export reports, audit trails, or time entries reflecting these items, please confirm that in writing and be prepared to describe the City's standard search workflow at the meeting.

Timing/delivery

If possible, please provide the above packet electronically to [redacted] by February 16, 2026, so I can review it before the meeting. If that is not feasible, please confirm that the City will have the materials available for review at the meeting.

To the extent the City treats any portion of this email as a new request for records under Chapter 552, please process it accordingly and provide any required written cost estimate before incurring charges.

With gratitude,

Kyle Moring

[redacted]

From:	Kyle Moring <[redacted]>
To:	Candias Webster <cwebster@mpcity.org>
Cc:	Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; "[redacted]" <[redacted]>
Date:	2026-02-27 19:12:29+00:00
Subject:	**Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability**
Attachments:	—
USB file:	Re Feb_18.msg

Report This Email

Ms. Webster,

You state: “This is the only transcript and recording I have,” and “I certify the City does not possess any information responsive to this request as we use the keywords you provide in your TPIA’s.”

I need clarification and additional action because that certification remains difficult to reconcile with **(1)** what City officials represented during the February 18, 2026 meeting regarding the City’s search process and the role of IT, and **(2)** the City’s demonstrated ability to locate and produce additional responsive emails over time when similar keyword criteria are applied.

1. Seth Bryan’s (Shawn Ray Bryan/Bryan IT/Bryan Information) role in City email searches

During the February 18, 2026 meeting, Mayor Lyon described that you “got with our IT guy” and that, “per those key words,” the IT staff member “could find” only certain emails. In that same discussion, the IT staff member was identified as “Seth Bryan.”

Because that discussion was made in an official City meeting about the processing of my public information requests, please confirm the following in writing:

a. Identity and official capacity

- Please confirm whether “Seth Bryan” is a City employee, contractor, or vendor support resource, and provide his title/role and department.
- Please confirm whether Mr. Bryan is the person who performed (or materially assisted with) email searches in response to my requests (including the December 30, 2025 Walmart-related request discussed during the February 18, 2026 meeting).

b. Scope of searches conducted by/through Mr. Bryan

For each search Mr. Bryan performed for my requests, please confirm (to the extent known or recorded):

- Which systems were searched (e.g., active email platform, any archive/eDiscovery tool, shared mailboxes, shared drives/OneDrive/SharePoint, etc.)
- Which custodians/accounts were searched (including whether shared mailboxes and/or accounts such as cwebster@mpcity.org, rvine@mpcity.org, and others were included)
- What date ranges were applied
- Whether searches were limited to message body only, subject only, attachments, or all fields

c. Records reflecting the IT search request and execution

Even if the City does not maintain a formal “search log,” the City may still maintain records reflecting search routing/execution in the ordinary course (e.g., emails forwarding keywords/date ranges to IT, help desk tickets/work orders, export reports, screenshots, audit logs, or internal notes). My request seeks those existing records – if they exist – not newly created explanations.

Accordingly, please produce any existing records reflecting:

- Your communications to IT (including to Mr. Bryan) conveying search terms, date ranges, custodians, or other parameters
- Any tickets/work orders opened for those searches
- Any export reports or system logs generated when results were collected for review/redaction/production

If the City’s position is that no such records exist, please confirm that the City does not create or retain any written communications, tickets, notes, or logs when requesting IT assistance with TPIA searches and that IT similarly retains no documentation reflecting what was run.

2. Request for an IT re-run using specified parameters

Your email again states that the City “use[s] the keywords” I provide. During the February 18, 2026 meeting, City officials also discussed the possibility of providing “what [IT] ran” or “the raw data,” so I could “fine tune it.”

To reduce ongoing disputes about completeness, I request that the City direct IT (including Mr. Bryan, if he is the designated search resource) to re-run the relevant email searches using the parameters I have provided (including domain-based criteria where

applicable), across the custodians/accounts reasonably likely to contain responsive records, for the applicable time periods.

To the extent the City contends it will not run a search using the parameters requested, please state that clearly in writing and identify the specific basis for refusing to run the search (as distinct from refusing to "create new records"). I am requesting a good-faith search for existing records—not the creation of new substantive content.

3. IT/export capability documentation

You continue to certify that the City possesses no information responsive to Item 3 (IT/export capability documentation).

That position remains difficult to reconcile with the City's use of multiple systems and vendors that typically include documentation, administrative settings, and support artifacts. During the February 18, 2026 meeting, City officials discussed system limitations and the MyGov-to-HSCloud transition and indicated that data/fields may not have migrated properly and that some records may not be searchable as a result—topics that would ordinarily generate vendor documentation, internal communications, or support tickets.

Please reopen Item 3 and conduct an additional search reasonably calculated to locate any existing records maintained by the City in the ordinary course, including:

- Vendor manuals/administrator guides or SOPs maintained by the City (even if provided by the vendor)
- IT tickets/notes/emails with vendors or internal staff regarding exports, data migration, searchability, or print-to-scan limitations
- Any system capability summaries, configuration notes, or procurement/implementation materials that describe export/search features

If the City continues to assert that none of the above exist, please confirm in writing that the City does not maintain vendor documentation, SOPs, tickets, or support communications for the City's principal systems used for email and records production.

4. Inconsistencies and the practical problem the City's position creates

The City's position appears to be: **(a)** the City uses the requestor's keywords, but **(b)** the City maintains no records of what was run, who ran it, what systems/custodians were searched, what date ranges were applied, and **(c)** the City maintains no IT/export capability documentation.

Separately, the City's productions over time have included additional emails and threads that appear to be responsive to the same or substantially similar keyword criteria previously used (including in the Walmart context discussed during the February 18, 2026 meeting). This pattern underscores why Item 1 (search scope/parameters) matters: without transparency into custodians, systems, date ranges, and exact parameters, the City's "no responsive records" determinations cannot be meaningfully assessed or narrowed.

If the City truly maintains no routing records, tickets, logs, export reports, or vendor documentation, that itself raises serious concerns about the City's ability to demonstrate a consistent, auditable process for handling TPIA searches and productions. At minimum, I am requesting the City confirm—clearly and unequivocally—what records it does and does not keep in the ordinary course regarding **(1)** IT-assisted searches and **(2)** export/production capability.

5. Preservation and next steps

Please preserve all records relating to: **(a)** the February 18, 2026 meeting recording/transcription process; **(b)** all communications with IT regarding searches for my requests; and **(c)** any IT/vendor materials regarding export/search capability, including tickets and emails.

If the City maintains its current position, I intend to provide your February 27, 2026 certification and the February 18, 2026 meeting excerpts describing IT's involvement (including identification of Mr. Bryan) to the Office of the Attorney General as part of a compliance complaint.

With gratitude,

Kyle Moring

[redacted]

On Feb 27, 2026, at 12:40 PM, Candias Webster <cwebster@mpcity.org> wrote:

Good afternoon, Mr. Moring,

Please see the response to your request

- **Transcript quality, lack of attribution, and apparent errors.** This is the only transcript and recording I have.
- **Items 1–3 remain outstanding – I certify the City does not possess any information responsive to this request as we use the keywords you provide in your TPIA's.**

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: Thursday, February 26, 2026 4:38 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted]
Subject: Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

Ms. Webster,

Thank you for providing a link to the City's recording and transcript of the February 18, 2026 meeting. I appreciate the production. However, I have concerns regarding **(1)** the apparent completeness and provenance of the recording and transcript, and **(2)** the City's continued position that the substantive portions of my request (Items 1–3) are closed.

1. Apparent incompleteness of the recording and transcript

The transcript provided ends abruptly mid-conversation. Based on my recollection, the meeting continued for a material period after the point where the transcript ends, including discussion directly relevant to this request (including, among other topics, the City's search workflow, IT involvement, and system limitations affecting export/searchability).

The audio file provided is approximately 57 minutes and 26 seconds long. In addition, the file properties displayed on my system reflect a creation date of February 26, 2026 (the date of production), rather than February 18, 2026 (the meeting date). I understand file properties can change when a file is copied, converted, or re-exported; however, this discrepancy raises questions about whether the City produced the original, complete recording.

Please confirm, in writing:

- What device/application was used to record the February 18, 2026 meeting, and who operated it (name and title)
- Whether the recording stopped during the meeting (and if so, when and why), or whether it was intentionally stopped before the meeting concluded
- Whether the audio file was edited, trimmed, converted, re-exported, or otherwise processed before production, and if so, by whom, when, and for what purpose
- Whether any additional recordings of the February 18, 2026 meeting exist (e.g., a continuation file, second recording, backup recording, or cloud upload) that have not been produced
- Why the produced file reflects a February 26, 2026 creation date (or similar) rather than a February 18, 2026 recording date

If the City possesses the original, complete recording, please produce the complete, unedited file in its native format with intact metadata. If the City's recording is incomplete, please state that clearly in writing and explain why.

2. Transcript quality, lack of attribution, and apparent errors

The transcript provided contains no speaker identification, which prevents attribution of statements to any particular official. I also understand that Mayor Lyon noted in forwarding the transcript earlier today that it "doesn't look very accurate in some place." I agree. There are multiple points where the transcript appears to contain transcription errors or unintelligible phrases that materially affect meaning.

I understand the City is not required to create new records, and I am not requesting that the City generate a new transcript. Rather, please produce any existing transcript versions, drafts, export formats, or vendor outputs generated in the ordinary course in connection with the City's recording/transcription of the February 18, 2026 meeting (including any versions that include speaker identification, timestamps, confidence scores, or other transcription metadata, if they exist).

3. Items 1–3 remain outstanding –

Your February 26, 2026 production provides the meeting recording and transcript and declares the request "closed." However, my request is not limited to the recording. It seeks records responsive to Items 1–3: **(1)** search scope and parameters used to process my TPIA requests; **(2)** workflow records underlying "no responsive records" and "previously furnished" determinations; and **(3)** IT/export capability documentation (including any records supporting "print-to-scan" limitations).

Your February 25, 2026 response stated that no responsive records exist for Items 1–3. My follow-up explained why that position is difficult to reconcile with what City officials described at the February 18, 2026 meeting and requested that the City reopen and conduct additional searches reasonably calculated to locate any responsive records maintained in the ordinary course (e.g., internal emails/messages, tickets/work orders, export reports, audit logs, screenshots, or vendor documentation).

For the avoidance of doubt: I do not consider Items 1–3 closed. I renew my request that the City reopen and conduct additional searches reasonably calculated to locate responsive records for each item and produce any responsive information located.

4. Preservation and next steps

Please preserve all recordings, transcripts, notes (including any handwritten notes referenced during the meeting), drafts, and internal communications related to **(a)** the February 18, 2026 meeting and **(b)** the processing of this request, consistent with my prior preservation notice.

If the City maintains its position that no responsive records exist for Items 1–3, or if the City cannot produce the complete original meeting recording (or identify whether additional recordings exist), I will treat that as a basis for an additional complaint to the Office of the Attorney General.

If additional clarification would be helpful, I am available to provide it.

With gratitude,

Kyle Moring

[redacted] | [redacted]

On Feb 26, 2026, at 11:29 AM, Candias Webster <cwebster@mpcity.org> wrote:

Mr. Morning,

Please see the link to the meeting transcript and recording.

<image001.png> February 18 Meeting

This request is closed 02/26/2026

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: Wednesday, February 25, 2026 5:57 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan

Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted]
Subject: Re: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

Ms. Webster,

Thank you for your email responding to my "Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability." In your response, you state that the City does not possess or maintain records responsive to items 1–3 and that the request is "closed" as of February 25, 2026. I am writing to ensure I understand the City's position correctly and to request that the City reconsider and conduct an additional search, because the City's response appears inconsistent with information communicated by City officials during our February 18, 2026 meeting.

1. **Item 1 – Search scope and parameters (records reflecting what was done)**

Your response indicates the City does not possess records reflecting custodians/accounts searched, systems searched, date ranges applied, exact search strings/filters executed, or who performed/supervised the searches. During the February 18 meeting, City officials described the search workflow in a manner suggesting that, in the ordinary course, there may be records reflecting request routing and search execution (for example: emails/messages transmitting search terms and date ranges to IT; help-desk tickets or work orders; screenshots; export reports; audit logs; or similar).

Please reopen the request and conduct a search reasonably calculated to locate any such records, including records maintained by IT and any internal communications between the City Secretary's office and IT relating to the searches performed for my requests.

2. **Item 2 – "No responsive records" / "previously furnished" determinations (records reflecting the workflow)**

Your response states that "the absence of evidence of a particular search … does not constitute evidence of absence of a particular search." I understand the distinction, but it does not address what I requested. I did not ask the City to prove that a search occurred; I requested any existing records that reflect how searches were routed and conducted, particularly where the City issued "no responsive records" responses or "previously furnished" certifications.

If the City maintains any records reflecting that workflow—custodian outreach emails, request-routing logs, internal notes, tickets, screenshots, export reports, or similar—please produce them. If the City maintains no such records, please confirm that the City does not create or retain any documentation of search execution (including request-routing communications, tickets, screenshots, export logs, or audit trails) in the ordinary course.

3. **Item 3 – IT/export capability documentation (records reflecting system capabilities)**

Your response states the City does not possess records regarding IT/export capability or any "print-to-scan" limitation. This is difficult to square with the City's use of vendor systems that typically include manuals, administrator guides, SOPs, and other documentation, and with prior representations regarding the City's export capabilities.

Please reopen the request and search for any responsive records, including vendor documentation, internal SOPs, system administration records, IT tickets/notes, or staff communications regarding export functionality for the systems used for email, archiving/eDiscovery (if any), permitting/building, code enforcement, health/inspections, utilities, and accounts payable.

February 18 meeting recording and transcript

At the February 18, 2026 meeting, Mayor Lyon stated the City was recording the meeting and that the recording would be shared and transcribed. I have not received either. Please confirm when the City will provide the recording and any transcript. If no transcript exists, please confirm that in writing. Please treat this paragraph as a request for public information under Chapter 552 for any recording, transcript, notes, or other records memorializing the February 18, 2026 meeting that are maintained by the City.

For these reasons, I do not consider this request closed. I respectfully ask that the City reopen it and conduct an additional search reasonably calculated to locate any responsive records described above. If additional clarification would be helpful, I am available to provide it.

With gratitude,

Kyle Moring

[redacted]

On Feb 25, 2026, at 3:35 PM, Candias Webster <cwebster@mpcity.org> wrote:

Good afternoon, Mr. Moring,

Please responses to your request.

A. When the City receives an open records request that includes specific date ranges and/or keywords, City staff search through City records using the date range and/or keywords provided by the requestor. The City does not possess any records responsive to this portion of your request.

B. The City does not maintain records responsive to this portion of your request. The City is obligated under state law to process open records requests by searching for any and all responsive records; however, the absence of evidence of a particular search for responsive information does not constitute evidence of absence of a particular search for responsive information, given the City's legal obligations under state law with regard to open records requests.

C. The City does not possess any records responsive to this portion of your request.

This request is closed as of today, February 25, 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: Monday, February 9, 2026 9:37 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Rob Vine <rvine@mpcity.org>; Austin Beck <abeck@dtrglaw.com>; Lea Ream <lream@dtrglaw.com>; Wesley Lyon <wlyon@mpcity.org>; Carl Hinton <CHinton@mpcity.org>; Debbie Corbell <DCorbell@mpcity.org>; Kelly Redfearn <KRedfearn@mpcity.org>; Jonathan Hageman <JHageman@mpcity.org>; Melanie Knight <melanie.knight@mpcity.org>; [redacted]
Subject: Feb. 18 Meeting Packet Request – TPIA Search Methodology and IT Export Capability

Good evening,

Ahead of the February 18, 2026 meeting with Mayor Lyon, Mayor Pro Tem Hinton, and Rob Vine, I am requesting that the City have available (and, where feasible, provide to me in advance) documentation sufficient to show how the City has been conducting and documenting searches for my Texas Public Information Act requests.

This request is focused on transparency and resolution. I am not asking the City to create new information or perform legal research; rather, I am requesting copies of any existing records maintained in the ordinary course that reflect search scope, search parameters, and processing steps.

A. Search scope and parameters – records sufficient to show what was done

For the following requests (or, if the City prefers, for the subset of requests the City contends are most disputed), please have available and/or provide copies of any existing records reflecting:

1. Custodians/accounts searched (including shared mailboxes), and whether MPPD custodians/accounts were included.

2. Systems searched (active email system; any email archive/eDiscovery platform; shared drives/SharePoint/OneDrive or other repositories, as applicable).

3. Date ranges applied.

4. Exact search parameters executed (keywords, domain filters, sender/recipient filters, attachment searching settings), including screenshots, export reports, or audit logs if maintained.

5. Who performed/supervised the search (name and title), and any time entries or task notes maintained in the ordinary course, showing time spent on search/export versus review/redaction.

B. "No responsive records" and "previously furnished" certifications – support for adequacy

For any request where the City issued a "no responsive records" response or a Gov't Code § 552.232(b) "previously furnished" certification, please have available the internal records (if any) showing that the City made a good-faith effort to relate the request to the information the City holds (e.g., custodian outreach emails, request-routing logs, or search/export reports).

C. IT/export capability documentation (including "print-to-scan" claims)

Please have available any existing documentation (vendor manuals, SOPs, screenshots, system capability summaries, or IT tickets/notes) sufficient to identify:

1. The principal systems used by the City (and MPPD, if applicable) for email, archiving/eDiscovery, permitting/building, code enforcement, fire, health/inspections, utilities, and accounts payable.

2. Whether those systems have native electronic export capability (e.g., .pst/.eml/.msg exports, PDF exports, CSV exports).

3. If the City contends any system can only be produced via "print-to-scan," the system name/vendor and any existing record describing that limitation.

If the City does not maintain any logs, export reports, audit trails, or time entries reflecting these items, please confirm that in writing and be prepared to describe the City's standard search workflow at the meeting.

Timing/delivery

If possible, please provide the above packet electronically to [redacted] by February 16, 2026, so I can review it before the meeting. If that is not feasible, please confirm that the City will have the materials available for review at the meeting.

To the extent the City treats any portion of this email as a new request for records under Chapter 552, please process it accordingly and provide any required written cost estimate before incurring charges.

With gratitude,

Kyle Moring

[redacted] | [redacted]