Kyle Douglas Moring, M.S., LPC-Associate
[redacted]

February 25, 2026

Honorable Ken Paxton
Attorney General
ATTN: Open Records Division
P.O. Box 12548
Austin, Texas 78711-2548

Re: Requestor's Position — City of Mount Pleasant 10-Day Letter
TPIA Request Date: February 09, 2026
Respondent: City of Mount Pleasant, Texas
Outside Counsel: Austin Beck, Davidson Troilo Ream & Garza, P.C.
City's 10-Day Letter Date: February 24, 2026
Exceptions Claimed: § 552.101 (confidential by law) and § 552.108 (law enforcement)

Dear Open Records Division:

I am the requestor in this matter. I write to provide my position in response to the City of Mount Pleasant's 10-day letter dated February 24, 2026, submitted by outside counsel Austin Beck, in which the City seeks to withhold certain records responsive to my February 09, 2026 TPIA request. The request sought emails and plans referenced by Deputy Chief Aristeo Rodriguez regarding fire alarm and sprinkler replacement at Walmart Store #131 in Mount Pleasant, Texas.

I respectfully submit that the City's claimed exceptions are unsupported by the facts, contradicted by the City's own conduct, and that counsel's submission to this office is materially incomplete.

I. The City Has Already Produced Records of the Same Type

On or about June 27, 2025, the City of Mount Pleasant produced a partial records response to a prior TPIA request for roofing and construction permits related to Walmart Store #131. That production included a subfolder titled *"Curbside addtion and remodel 2024,"* which contained a *"Fire"* subdirectory with the following files:

- Fire Alarm.pdf
- Fire Sprinklers.pdf
- UL Technical Report NC27954.pdf
- WM 131 Mt. Pleasant, TX – Combined M&E Submittal (4.16.2024).pdf
- WM 131 Mt. Pleasant, TX – FP Combine Submittals (4.16.2024).pdf
- WM 131 Mt. Pleasant, TX – Hydraulic Calcs Combine (4.16.2024).pdf

These are fire alarm plans, fire sprinkler plans, fire protection submittals, and hydraulic calculations for the same Walmart Store #131 that is the subject of my February 9 request. The City produced them without claiming any exception. The City cannot now assert § 552.101 or § 552.108 to withhold records of the same type and same facility that it has already voluntarily disclosed to me in a prior

production. Prior voluntary disclosure of the same category of records defeats a claim of confidentiality. See, e.g., *Open Records Decision No. 561* (1990) (information loses its confidential character when the governmental body has previously disclosed it).

II. The § 552.108 Law Enforcement Exception Is Inapplicable

Section 552.108 protects law enforcement information whose release would interfere with the detection, investigation, or prosecution of crime or would endanger the life or physical safety of an individual. Fire alarm and sprinkler replacement plans for a commercial retail facility are routine building and fire safety records maintained by the City's fire marshal and building inspections department. They are not law enforcement records, and their disclosure does not implicate any law enforcement interest.

Moreover, the City's own conduct undermines any claim that § 552.108 applies to records it considers sensitive. In response to other TPIA requests, the City has produced records involving MPPD Case No. [redacted]. If the City did not withhold records related to an active criminal investigation involving a minor under § 552.108, it cannot credibly claim that commercial fire system plans for a Walmart require law enforcement protection.

III. The § 552.101 Confidentiality Exception Lacks a Specific Legal Basis

Section 552.101 requires the governmental body to identify a specific law that makes the requested information confidential. The City's 10-day letter cites § 552.101 but does not identify the specific confidentiality provision it relies upon. The City bears the burden of establishing the applicability of a claimed exception, and a bare citation to § 552.101 without identifying the underlying confidentiality law is insufficient. See Tex. Gov't Code § 552.301(e)(1)(A).

Fire alarm and fire sprinkler plans submitted as part of a commercial building permit application are not confidential under any provision I am aware of. To the contrary, building permit records are routinely available as public records. If the City intends to rely on a specific statute in its brief to your office, I reserve the right to supplement this position in response.

IV. The City Did Not Seek an Attorney General Ruling on the Original Request

My February 9, 2026 request is a supplemental request that specifically identified records referenced in an internal City email thread already in my possession. The underlying records — emails and plans regarding fire alarm and sprinkler replacement at Walmart Store #131 — were first encompassed by an earlier TPIA request submitted on October 18, 2025 (attached hereto as **Attachment C**). That original request expressly instructed the City: "If you assert any exceptions, please seek an Attorney General ruling under § 552.301 and release all segregable information." When the City responded, it did not seek an Attorney General ruling, did not claim any exception under § 552.101 or § 552.108, and did not file a 10-day letter. Instead, the City produced a partial response that included fire system records (as detailed in Section I above) without objection.

The City's decision to now seek an Attorney General ruling on a supplemental request for the same category of records it previously produced without objection suggests that the claimed exceptions are pretextual rather than substantive.

V. Counsel's 10-Day Submission Is Materially Incomplete

My February 09, 2026 TPIA request specifically referenced and attached an internal City email thread dated October 23, 2025, involving Deputy Chief Aristeo Rodriguez, City Secretary Candias Webster, and other City staff. In that thread, Deputy Chief Rodriguez confirmed to Webster that *"there are emails and plans of their fire alarm and sprinkler system replacement"* for Walmart Store #131. In the same email thread, Rodriguez (arodriguez@mpcity.org) attached three fire safety files: *Fire Action Codes.pdf*, *Fire Inspection 7-23-21.PDF*, and *Fire Inspection 9-11-24.PDF*. These attachments were produced to me by the City as part of its TPIA response. The fact that Rodriguez freely circulated fire

inspection records and fire action codes as routine internal attachments further demonstrates that the City treats fire safety records for this facility as ordinary administrative materials — not as law enforcement or confidential information.

This email thread was produced to me by the City in response to an earlier TPIA request and formed the specific basis for my February 09, 2026 supplemental request. Mr. Beck's 10-day letter to this office does not attach or reference this email, despite the fact that it was included with my TPIA correspondence to the City. The omission is significant because the Rodriguez email demonstrates that: (1) the records exist; (2) City staff discussed them openly in routine internal communications with fire inspection attachments; and (3) the City treated these records as ordinary administrative correspondence — not as law enforcement or confidential materials. I respectfully request that this office consider the attached Rodriguez email thread in evaluating the City's claimed exceptions.

VI. Conclusion

I respectfully request that the Attorney General rule that the City of Mount Pleasant must release the requested records in full. The City's claimed exceptions are unsupported by the facts and contradicted by the City's own conduct. Specifically: (1) the City has already produced fire alarm and sprinkler records for the same facility without claiming any exception; (2) § 552.108 does not apply to routine commercial fire safety records, and the City has released far more sensitive law enforcement records without invoking it; (3) the City has not identified a specific confidentiality law to support its § 552.101 claim; (4) the City did not seek an Attorney General ruling when these same records were originally requested; and (5) counsel's submission omits the key email that prompted my request and that confirms the records are routine administrative materials.

I am available to provide additional information or documentation if needed.

Respectfully submitted,



Kyle Douglas Moring, M.S., LPC-Associate
[redacted] | [redacted]

Attachment A

Internal City Email Thread — Deputy Chief Rodriguez et al. (Oct. 23, 2025)

From: "Aristeo Rodriguez" <arodriguez@mpcity.org>

To: "Candias Webster" <cwebster@mpcity.org>
"Jennifer Williams" <jwilliams@mpcity.org>
"Larry McRae" <LMcRae@mpcity.org>
"Danny Beard" <DBeard@mpcity.org>
"Brad Eubanks" <BEubanks@mpcity.org>
"Erin Marshall" <emarshall@mpcity.org>
"Kelly Tinsley" <KTinsley@mpcity.org>
"John Ankrum" <jankrum@mpcity.org>
"Lynn Barrett" <LBarrett@mpcity.org>
"Regina Reynolds" <rreynolds@mpcity.org>

Date: 10/23/2025 12:26:55 PM

Subject: Re: Texas PIA – Three Separate Requests (Please Assign Separate Tracking Nos.) – Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, TX – 1/1/2021–10/18/2025

Attachments: Fire Action Codes.pdf
Fire Inspection 7-23-21.PDF
Fire Inspection 9-11-24.PDF

Headers:
From: "Aristeo Rodriguez" <arodriguez@mpcity.org>
Sender: "Aristeo Rodriguez" <arodriguez@mpcity.org>
To: "Candias Webster" <cwebster@mpcity.org>,
"Jennifer Williams" <jwilliams@mpcity.org>,
"Larry McRae" <LMcRae@mpcity.org>,
"Danny Beard" <DBeard@mpcity.org>,
"Brad Eubanks" <BEubanks@mpcity.org>,
"Erin Marshall" <emarshall@mpcity.org>,
"Kelly Tinsley" <KTinsley@mpcity.org>,
"John Ankrum" <jankrum@mpcity.org>,
"Lynn Barrett" <LBarrett@mpcity.org>,
"Regina Reynolds" <rreynolds@mpcity.org>
Subject: =??Q?Re:_Texas_PIA_=96_Three_Separate_Requests_(Please_Assign_Se?=
=??Q?parate_Tracking_Nos.)_=96_Walmart_Supercenter_#131=2C_2311_S.?=
=??Q?_Jefferson_Ave.=2C_Mount_Pleasant=2C_TX_=96_1/1/2021=9610/18/2025?=
Date: Thu, 23 Oct 2025 12:26:55 -0600
MIME-Version: 1.0
Content-Type: multipart/mixed; boundary="Mark=_43553121776582"
Received: from LV3PR16MB6619.namprd16.prod.outlook.com
(2603:10b6:408:27a::7) by BYAPR16MB2552.namprd16.prod.o
utlook.com with HTTPS; Thu, 23 Oct 2025 18:26:58 +0000
Authentication-Results: dkim=none (message not signed) hea
der.d=none;dmarc=none action=none header.from=mpcity.org;
Received: from SA2PR16MB4074.namprd16.prod.outlook.com (2603:10b6:806:1
4b::14) by LV3PR16MB6619.namprd16.prod.outlook.com (2603:10b6:408:27a::
7) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WIT
H_AES_256_GCM_SHA384) id 15.20.9253.12; Thu, 23 Oct 2025 18:26:55 +0000
Received: from SA2PR16MB4074.namprd16.prod.outlook.com ([fe80::35dc:1caa:
f14d:e324]) by SA2PR16MB4074.namprd16.prod.outlook.com ([fe80::35dc:1caa:
f14d:e324%6]) with mapi id 15.20.9253.011; Thu, 23 Oct 2025 18:26:55 +000
0
Thread-Topic: =?utf-8?B?VGV4YXMgUElBIOKAkyBUaHJlZSBTZXBhcmF0ZSBSZXF1ZXN0cyA
oUGxlYXNl?= =?utf-8?B?IEFzc2lnbiBTZXBhcmF0ZSBUcmFja2luZyBOb3MuKSDigJMgV2Fsb
WFydCBT?= =?utf-8?B?dXBlcmNlbnRlciAjMTMxLCAyMzExIFMuIEplZmZlcnNvbiBBdmUuLCB
Nb3Vu?= =?utf-8?B?dCBQbGVhc2FudCwgVFgg4oCTIDEvMS8yMDIx4oCTMTAvMTgvMjAyNQ==?
=
Thread-Index: AQHcQFmzpezb3UMpvEy1/enVklHWCrTLInhggATwfuw=
In-Reply-To: <CYYPR16MB5534C76F22D06351763AE8E5
B7F5A@CYYPR16MB5534.namprd16.prod.outlook.com>
Accept-Language: en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-Exchange-Organization-SCL: 1
X-MS-TNEF-Correlator: <SA2PR16MB407407107DA0848F96B
103E7BAF0A@SA2PR16MB4074.namprd16.prod.outlook.com>
msip_labels:
X-MS-Exchange-Organization-MessageDirectionality: Originating
X-MS-Exchange-Organization-AuthSource:
SA2PR16MB4074.namprd16.prod.outlook.com
X-MS-Exchange-Organization-AuthAs: Internal
X-MS-Exchange-Organization-AuthMechanism: 04
X-MS-Exchange-Organization-Network-Message
-Id: 9b3fb6e3-11c0-4d90-c1c2-08de1261be96
X-MS-PublicTrafficType: Email

X-MS-TrafficTypeDiagnostic: SA2PR16MB4074
:EE_|LV3PR16MB6619:EE_|BYAPR16MB2552:EE_
Return-Path: arodriguez@mpcity.org
X-MS-Exchange-Organization-ExpirationSta
rtTime: 23 Oct 2025 18:26:55.6030 (UTC)
X-MS-Exchange-Organization-ExpirationStartTimeReason: OriginalSubmit
X-MS-Exchange-Organization-ExpirationInterval: 1:00:00:00.0000000
X-MS-Exchange-Organization-ExpirationIntervalReason: OriginalSubmit
X-MS-Office365-Filtering-Correlation-Id
: 9b3fb6e3-11c0-4d90-c1c2-08de1261be96
X-Microsoft-Antispam: BCL:0;ARA:13230040|366016|92
1020|7053199007|8096899003|4013099003|41050700001;
X-Forefront-Antispam-Report: CIP:255.255.255.255;CTRY:;LANG
:en;SCL:1;SRV:;IPV:NLI;SFV:NSPM;H:SA2PR16MB4074.namprd16.pr
od.outlook.com;PTR:;CAT:NONE;SFS:(13230040)(366016)(921020)
(7053199007)(8096899003)(4013099003)(41050700001);DIR:INT;
X-MS-Exchange-CrossTenant-OriginalArriv
alTime: 23 Oct 2025 18:26:55.1187 (UTC)
X-MS-Exchange-CrossTenant-FromEntityHeader: Hosted
X-MS-Exchange-CrossTenant-Id: cac4c7b5-7b5e-4539-b190-69056324b806
X-MS-Exchange-CrossTenant-AuthSource: S
A2PR16MB4074.namprd16.prod.outlook.com
X-MS-Exchange-CrossTenant-AuthAs: Internal
X-MS-Exchange-CrossTenant-Network-Message
-Id: 9b3fb6e3-11c0-4d90-c1c2-08de1261be96
X-MS-Exchange-CrossTenant-MailboxType: HOSTED
X-MS-Exchange-CrossTenant-UserPrincipalName: Rv2KzvCmKlDpcoDmyV0X/K
AKQiouol+j3A7f/c0lzOXvVTGqI02Zfu7RWVuBkMHve23tGDZ5K3ej5IL58Hgh2A==
X-MS-Exchange-Transport-CrossTenantHeadersStamped: LV3PR16MB6619
X-MS-Exchange-Transport-EndToEndLatency: 00:00:02.8959485
X-MS-Exchange-Processed-By-BccFoldering: 15.20.9228.014
X-MS-Exchange-ExternalInOutlookResult: NotEnabled
X-Microsoft-Antispam-Mailbox-Delivery: ucf:0;jmr:0;auth:0;dest:I;E
NG:(910005)(944506478)(944626604)(920097)(425001)(930097)(140003);
X-Microsoft-Antispam-Message-Info: uMNCfYkNywryu8nagG3BzFpbl0L+jz+gGy9eNf
q4hnsD9nPHxb+QMBfQzcCtacmccKckjFAcOGgT60H9hnvWsb0EpYM/2gEqsR1DWaRTyK0skpi
5MS6+nvl2EeiF1VkgeEFoUAw12nfC5J6JBtBNK2FRLWXW+I5dxyvLAP3b2PmzAMIxG7l09tJz
lNyaF0hhiUU6TT7mxJgHxXiN1wx+UOpFovKbohAKzhMrlWLwITK9meMzntlc4A9Zkdry3rIox
ZiSgmxml7Z9aufId5oZ8/ezl+kusM+m0jv4lp0uGtOwT9xEgyOGqlKvPkov2IIJM27cp2GylX
zLUTvTM/T9i+7i9t+OU8j6rTj/a9krmzmYJcf9nxTEZ+MvA80vmHnolTOA+oMI+3lQ95vMUly
ToEdWnuE6xQfAoWlkRmJy7cicp976AiAAdf5Qfc/u2/3ObaWh38zQ6cO1dUUCYpfyUgo1fxhL
HEj6XkzZ3wel3SyGaoWh9KE9WZi1eWp++vZ0LcBs/esDs7MCsZoHcpxBPZb2Ud+IKrbSP4+cW
PE5KCZbPiToWBt56zn19NVT1S6gyyAi/BiABxZledp/3axXHKECoYRA8KFFrnZZM/pwTVV+Av
CmGknHyqoWWjERtV3qnDFNsZA06CsGdcEfBFD9EhQSh8YhDKEyEl+hcMQE/rPLqX1e6vb5v5i
VQBKnQAKfDlklPaEOidZurEUwTIGEZ+b/vXjMBZ0V9tvkQ64GbuSBFBXYmWbnNWfcK62UOlCn

Candias,

There are emails and plans of their fire alarm and sprinkler system replacement. I'll send later today on this thread.

Aristeo Rodriguez

Deputy Chief

Mt. Pleasant Fire Dept

work: 903-575-4144

cell: [redacted]

From: Candias Webster <cwebster@mpcity.org>
Sent: Monday, October 20, 2025 9:57 AM
To: Jennifer Williams <jwilliams@mpcity.org>; Larry McRae <LMcRae@mpcity.org>; Danny Beard <DBeard@mpcity.org>; Aristeo Rodriguez <arodriguez@mpcity.org>; Brad Eubanks <BEubanks@mpcity.org>; Erin Marshall <emarshall@mpcity.org>; Kelly Tinsley <KTinsley@mpcity.org>; John Ankrum <jankrum@mpcity.org>; Lynn Barrett <LBarrett@mpcity.org>; Regina Reynolds <rreynolds@mpcity.org>
Subject: FW: Texas PIA – Three Separate Requests (Please Assign Separate Tracking Nos.) – Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, TX – 1/1/2021–10/18/2025

Good morning,

Please see below and advise if you have any information on this request.

Thank you,
Candias Webster, TRMC, CMC
Assistant City Manager/ City Secretary
City of Mt. Pleasant
Office: 903-575-4154
Cell: [redacted]
Fax: 903-577-1828

ATTENTION OFFICIALS : A "Reply to All" on this e-mail or reply or forward to one other official could lead to violations of the Texas Open Meetings Act. Please reply only to the sender.

CONFIDENTIALITY NOTICE: This e-mail is intended solely for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, dissemination, copying, printing, or other use of this e-mail by persons or entities other than the addressee is prohibited. If you have received this e-mail in error, please contact the sender immediately and delete the material from your computer

From: Kyle Moring <[redacted]>
Sent: Saturday, October 18, 2025 1:04 PM
To: Candias Webster <cwebster@mpcity.org>
Cc: Austin Beck <abeck@dtrglaw.com>
Subject: Texas PIA – Three Separate Requests (Please Assign Separate Tracking Nos.) – Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, TX – 1/1/2021–10/18/2025

CAUTION: [EXTERNAL EMAIL]

Good afternoon,

Pursuant to the Texas Public Information Act (Texas Gov't Code ch. 552) , I am submitting three separate public information requests concerning Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, Texas 75455 , for the date range January 1, 2021, through October 18, 2025 . I am sending them in one email for convenience, but please treat each numbered item below as a separate request, assign a distinct tracking number to each, and process them independently (including separate cost estimates and timelines).

Common parameters for all three requests

- Date range: 1/1/2021–10/18/2025

- Location: Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, TX 75455 (include adjacent city-owned sewer/storm infrastructure serving the site).
- Delivery format: Electronic production only—PDF for documents; CSV/Excel for tabular data/exports; native .msg /.pst for emails where feasible; original digital format for media (e.g., CCTV videos). Please deliver by email or a download link.
- Search terms to aid retrieval: "Walmart," "Wal\u8209 -Mart," "Store 131," "2311 S Jefferson," "fire watch," "impairment," "sprinkler," "alarm," "system out of service," "sewer," "line break," "repair," "CCTV," "SSO," "overflow," "illicit discharge," "stormwater," "FOG," "grease."
- Fees: If estimated charges exceed $100 , please send an itemized estimate under §552.2615 before proceeding. I consent to rolling/partial production .
- Redactions/withholding: If you assert any exceptions, please seek an Attorney General ruling under §552.301 and release all segregable information.

Request #1 – Fire Department/Fire Marshal (Fire Watch & Fire System Impairments)

Please route to: Fire Department / Fire Marshal

1. All records that mention, impose, or document a "fire watch" at the above location, including: fire watch orders /directives, impairment notifications/approvals, notices of violation/correction, inspection notes, re-inspection results, clearance/return\u8209 -to\u8209 -service documentation, and any fire watch logs supplied by the facility.
2. All records of fire protection system impairments (fire alarm, sprinkler, fire pump, kitchen hood suppression), including impairment forms, acceptance/functional test results, and any attachments (photos/diagrams).
3. Correspondence (including email with attachments) between Fire Department/Fire Marshal personnel and Walmart staff, property managers, or contractors referencing fire watch or impaired fire protection systems at this site.
4. Any incident/inspection reports coded with or referencing: fire watch, alarm trouble, alarm out of service, sprinkler impairment, system impairment, or similar terminology for this site.

Request #2 – Utilities/Public Works (Wastewater, Sewer, Stormwater/MS4, FOG/Grease)

Please route to: Utilities/Public Works (Wastewater Collection, Stormwater/MS4, Permitting/ROW)

1. Sanitary sewer : work orders, service requests, emergency responses, line break/repair reports , CCTV inspection videos and logs , smoke/dye test results, cleaning/jetting logs, and maps/as\u8209 -builts for the collection system serving the site and any work performed in the parking lot/frontage .
2. SSO/unauthorized discharge records and reports (including TCEQ notifications), field notes, photos, corrective actions, and post-incident summaries in or affecting the site.
3. FOG/grease program records involving Walmart #131 or food service tenants within it: grease trap/interceptor inspection reports, pump\u8209 -out/manifests (if held), notices of violation, enforcement actions, correspondence, and compliance follow-ups.
4. Stormwater/MS4 : illicit discharge complaints/investigations, inspections, enforcement actions, photos, and any records of non-stormwater discharges (e.g., grease) to storm drains associated with the site.
5. Permits : right-of-way/street\u8209 -cut/excavation permits, utility connection/tap records, and locate /mark\u8209 -out tickets related to sewer/storm infrastructure at or immediately adjacent to the store.
6. Correspondence (including email with attachments) among Utilities/Public Works, Code/Permitting, the City Manager's Office, and Walmart or its contractors regarding sewer/stormwater issues, line breaks/repairs, SSOs, illicit discharges, or FOG at this location.

Request #3 – Cross\u8209 -Department Emails, Permits & Code/Building Records

Please route to: City Manager's Office, City Secretary, Building/Permitting, Code Compliance, Fire, Utilities/Public Works (as appropriate)

1. Emails (with attachments) among the City Manager's Office, City Secretary, Building/Permitting, Code Compliance, Fire Department, Utilities/Public Works, and outside parties (Walmart, property managers, and contractors) concerning any "fire watch," fire protection system impairment, sewer/wastewater/stormwater issue, SSO, illicit discharge, grease/FOG, or related excavation/repair at this site .
    - Email fields requested: From/To/CC/BCC, Subject, Date/Time, full message body, and all attachments.
    - Preferred formats: native .msg/.pst if feasible; otherwise, PDF with attachments preserved.
2. Permits/approvals not captured elsewhere, including building permits , special inspections , or site plan adjustments relating to fire protection impairments or sewer/storm repairs at this location.
3. Any internal memoranda, briefings, or meeting notes specifically addressing fire watch periods or wastewater /stormwater incidents at this store.

Important: I am not submitting my Police/Dispatch (CAD/911) request in this email; I will send that request separately.

Please confirm receipt of this email and provide the three separate tracking numbers , along with the assigned point of contact for each request. Do not hesitate to contact me if narrowing would materially reduce cost or time.

Thank you for your assistance.

With gratitude,

Kyle Moring

[redacted] | [redacted]

Attachment B

Prior Production File Listing — Fire System Records (June 27, 2025)

Prior Production — Fire System Records

City of Mount Pleasant Partial Records Response (June 27, 2025)
Roofing & Construction Permits — Walmart Store #131

Subfolder: Wal-Mart / Curbside addtion and remodel 2024 / Fire /

Fire Alarm.pdf

Fire alarm system plans

Fire Sprinklers.pdf

Fire sprinkler system plans

UL Technical Report NC27954.pdf

UL certification / technical report

WM 131 Mt. Pleasant, TX - Combined M&E Submittal (4.16.2024).pdf

Combined mechanical & electrical submittal

WM 131 Mt. Pleasant, TX - FP Combine Submittals (4.16.2024).pdf

Combined fire protection submittals

WM 131 Mt. Pleasant, TX - Hydraulic Calcs Combine (4.16.2024).pdf

Combined hydraulic calculations

Note: These fire alarm plans, fire sprinkler plans, fire protection submittals, and hydraulic calculations were produced by the City of Mount Pleasant without claiming any exception under the Texas Public Information Act. They pertain to the same Walmart Store #131 that is the subject of the February 9, 2026 TPIA request at issue in this 10-day ruling.

Prepared: February 25, 2026

Attachment C

Original TPIA Request to City of Mount Pleasant (Oct. 18, 2025)

From: Kyle Moring [redacted]
Subject: Texas PIA – Three Separate Requests (Please Assign Separate Tracking Nos.) – Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, TX – 1/1/2021–10/18/2025
Date: October 18, 2025 at 1:04 PM
To: Candias Webster cwebster@mpcity.org
Cc: Austin Beck abeck@dtrglaw.com

KM

Good afternoon,

Pursuant to the **Texas Public Information Act (Texas Gov't Code ch. 552)**, I am submitting **three separate public information requests** concerning **Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, Texas 75455**, for the date range **January 1, 2021, through October 18, 2025**. I am sending them in one email for convenience, but **please treat each numbered item below as a separate request, assign a distinct tracking number to each, and process them independently (including separate cost estimates and timelines).**

Common parameters for all three requests

- **Date range:** 1/1/2021–10/18/2025
- **Location:** Walmart Supercenter #131, 2311 S. Jefferson Ave., Mount Pleasant, TX 75455 (include adjacent city-owned sewer/storm infrastructure serving the site).
- **Delivery format:** Electronic production only—PDF for documents; CSV/Excel for tabular data/exports; native **.msg/.pst** for emails where feasible; original digital format for media (e.g., CCTV videos). Please deliver by email or a download link.
- **Search terms to aid retrieval:** "Walmart," "Wal-Mart," "Store 131," "2311 S Jefferson," "fire watch," "impairment," "sprinkler," "alarm," "system out of service," "sewer," "line break," "repair," "CCTV," "SSO," "overflow," "illicit discharge," "stormwater," "FOG," "grease."
- **Fees:** If estimated charges **exceed $100**, please send an **itemized estimate under §552.2615** before proceeding. I consent to **rolling/partial production**.
- **Redactions/withholding:** If you assert any exceptions, please **seek an Attorney General ruling under §552.301** and release all **segregable** information.

Request #1 – Fire Department/Fire Marshal (Fire Watch & Fire System Impairments)

Please route to: Fire Department / Fire Marshal

1. All records that **mention, impose, or document a "fire watch"** at the above location, including: fire watch orders/directives, impairment notifications/approvals, notices of violation/correction, inspection notes, re-inspection results, clearance/return-to-service documentation, and any **fire watch logs** supplied by the facility.
2. All records of **fire protection system impairments** (fire alarm, sprinkler, fire pump, kitchen hood suppression), including impairment forms, acceptance/functional test results, and any attachments (photos/diagrams).
3. **Correspondence (including email with attachments)** between Fire Department/Fire Marshal personnel and Walmart staff, property managers, or contractors **referencing fire watch or impaired fire protection systems** at this site.
4. Any incident/inspection reports coded with or referencing: *fire watch, alarm trouble, alarm out of service, sprinkler impairment, system impairment*, or similar terminology for this site.

Request #2 – Utilities/Public Works (Wastewater, Sewer, Stormwater/MS4, FOG/Grease)

Please route to: Utilities/Public Works (Wastewater Collection, Stormwater/MS4, Permitting/ROW)

1. **Sanitary sewer**: work orders, service requests, emergency responses, **line break/repair reports**, **CCTV inspection videos and logs**, smoke/dye test results, cleaning/jetting logs, and maps/as-builts for the collection system serving the site and any work performed in the **parking lot/frontage**.
2. **SSO/unauthorized discharge** records and reports (including TCEQ notifications), field notes, photos, corrective actions, and post-incident

summaries in or affecting the site.

3. **FOG/grease** program records involving Walmart #131 or food service tenants within it: grease trap/interceptor inspection reports, pump-out/manifests (if held), notices of violation, enforcement actions, correspondence, and compliance follow-ups.

4. **Stormwater/MS4**: illicit discharge complaints/investigations, inspections, enforcement actions, photos, and any records of **non-stormwater discharges (e.g., grease) to storm drains** associated with the site.

5. **Permits**: right-of-way/street-cut/excavation permits, utility connection/tap records, and **locate/mark-out** tickets related to sewer/storm infrastructure at or immediately adjacent to the store.

6. **Correspondence (including email with attachments)** among Utilities/Public Works, Code/Permitting, the City Manager's Office, and Walmart or its contractors regarding **sewer/stormwater issues, line breaks/repairs, SSOs, illicit discharges, or FOG** at this location.

Request #3 – Cross-Department Emails, Permits & Code/Building Records

Please route to: City Manager's Office, City Secretary, Building/Permitting, Code Compliance, Fire, Utilities/Public Works (as appropriate)

1. **Emails (with attachments)** among the City Manager's Office, City Secretary, Building/Permitting, Code Compliance, Fire Department, Utilities/Public Works, and outside parties (Walmart, property managers, and contractors) **concerning any "fire watch," fire protection system impairment, sewer/wastewater/stormwater issue, SSO, illicit discharge, grease/FOG, or related excavation/repair at this site**.
    - **Email fields requested:** From/To/CC/BCC, Subject, Date/Time, full message body, and all attachments.
    - **Preferred formats:** native **.msg/.pst** if feasible; otherwise, PDF with attachments preserved.
2. **Permits/approvals** not captured elsewhere, including **building permits**, **special inspections**, or site plan adjustments relating to **fire protection impairments** or **sewer/storm repairs** at this location.
3. Any **internal memoranda, briefings, or meeting notes** specifically addressing **fire watch** periods or **wastewater/stormwater incidents** at this store.

Important: I am **not** submitting my **Police/Dispatch (CAD/911)** request in this email; I will send that request separately.

Please confirm receipt of this email and provide the **three separate tracking numbers**, along with the assigned point of contact for each request. Do not hesitate to contact me if narrowing would materially reduce cost or time.

Thank you for your assistance.

With gratitude,

Kyle Moring
[redacted]