From Kent Richardson <Kent.Richardson@oag.texas.gov>

Date Jul 7, 2026 at 6:09 PM CDT

To Kyle Moring <[redacted]>

Subject RE: PIA Complaint - Department of State Health Services

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Mr. Moring,

In further discussions with DSHS on your request for reconsideration, the attached documents were provided in response to my questions based on your request. You may already have the email messages, but they are provided to ensure receipt. The pdf record is the handwritten notes you noted were missing.

For your request that covered your own complaint correspondence related to Complaint No. 1524250148, further clarification is requested if possible. DSHS is not sure what is being requested.

For the native photos, can you provide the photos (in the word doc) you reference for them to know which specific photos you need in native format?

Thank you.

Kent Richardson
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kent.richardson@oag.texas.gov

From: Kyle Moring <[redacted]>
Sent: Tuesday, June 30, 2026 11:35 AM
To: Kent Richardson <Kent.Richardson@oag.texas.gov>
Subject: Re: PIA Complaint - Department of State Health Services

Mr. Richardson,

Thank you for your note. As requested, below is a section-by-section identification of the DSHS request number(s) implicated by each numbered section of my Request to Revise, for reference in your office's discussion with DSHS.

For orientation, the June 5, 2026 determination addressed two DSHS requests: ORR No. A10312025.0450015 (Finding 1) and ORR No. A01022026.0450018 (Finding 2). My Request to Revise addresses those two findings and references several related DSHS requests where they bear on the same records, the same production pattern, or the same cure items. The mapping is as follows:

Section I – City of Mount Pleasant production / DSHS correspondence with the City not produced.
Primary: A10312025.0450015. Section B of that request sought DSHS correspondence with the City of Mount Pleasant from September 1, 2025 to the present. The September 11, 2025 inbound email to DSHS's Mari Anguiano relates to A09092025.0450008. The Notice of Inspectional Observations hash-match concerns records first produced under A02132026.0450001 on February 23, 2026 and omitted from the earlier production under A08112025.0450008 on August 22, 2025.

Section II – Inspection report metadata / 30 attachments enumerated vs. 29 produced.
A10312025.0450015, specifically the December 15, 2025 production. The comparison to Inspector Bradley's notes draws on the July 28, 2025 inspection records produced under A08112025.0450008.

Section III – Commissioner Shuford / named custodian not produced.
A10312025.0450015. Section B named Commissioner Jennifer Shuford as a custodian whose communications were to be included.

Section IV – Unreconciled tenant-wide search results / approximately 828 email items and approximately 67 SharePoint items.
A10312025.0450015.

Section V – Hyland "no responsive records," then produced.
A01022026.0450018, which was closed "no responsive records" on January 9, 2026, and A01132026.0450001, the re-filed request under which two Hyland exports were produced on January 16, 2026. Related OnBase/Hyland system documentation was produced under A01022026.0450003 on January 16 and January 23, 2026. The "uploaded into Hyland" note appears in Mobile Inspection Report No. 310327, produced under A10312025.0450015.

Section VI – Unproduced complaint correspondence / 42 emails concerning Complaint No. 1524250148.
Principally A10312025.0450015, and related requests that sought records about Complaint No. 1524250148: A08112025.0450008, A09092025.0450008, and A10172025.0450029, with follow-up assigned A11172025.0450009.

Section VII – Missing native records and search-method deficiencies / native .eml or .msg files, native photographs with metadata, and text/SMS for eight named custodians.
A10312025.0450015.

Corroborative paragraph – HHSC OIG referral.
DSHS request A02172026.0450014, closed "no responsive records" on February 23, 2026; the underlying HHSC OIG ticket WP-000049 was processed by HHSC OIG as A01272026.0450037. This is offered as corroborative only and is not an independent basis for revision on the two requests addressed by the June 5 determination.

Section VIII – Corrections to the determination's background timeline.
A01022026.0450018 for the "12/30/26" date correction, and A10312025.0450015 for the closure-letter-versus-CD-shipment dates.

Section IX – Standard for revision.
Applies to the determination's two findings: Finding 1, A10312025.0450015, and Finding 2, A01022026.0450018.

The cure items in my Requested Action are keyed to Complaint No. 1524250148, File No. 8665, and License No. 0036543, and to the records identified above under A10312025.0450015, A01022026.0450018, A01132026.0450001, and A01022026.0450003.

For convenience, I have attached a one-page Section-to-ORR crosswalk of the same mapping.

Separately, and for context only, I have since filed OAG Open Records Division Service Request No. OR-26-031651-IC concerning DSHS ORR No. A04292026.0450008 (M-1-042626). I mention that only to note a continuing production-pattern issue; it is separate from the § 552.3215 matter before your office, and no action on that separate ORD complaint is requested in this thread.

Please let me know if it would help to have this mapping in any other format.

Respectfully,

Kyle Moring
[redacted] | [redacted]

On Jun 30, 2026, at 10:49 AM, Kent Richardson <Kent.Richardson@oag.texas.gov> wrote:

Mr. Moring,

For your request for revise, can you identify the request number for each of the numbered sections (where one is not mentioned) of the request for reference when discussing with DSHS? They need to know which requests are in question.

Thank you.

Kent Richardson
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From: Kyle Moring <[redacted]>
Sent: Saturday, June 6, 2026 10:57 PM
To: Kent Richardson <Kent.Richardson@oag.texas.gov>
Cc: CrimPros Intake <crimprosintake@oag.texas.gov>
Subject: Re: PIA Complaint - Department of State Health Services

Mr. Richardson,

Attached please find my Request to Revise the June 5, 2026 determination in the above matter, together with the two principal enclosures attached here: the Combined Evidence Exhibits workbook and standalone Exhibit 6, Metadata and Production Reconciliation.

I have also uploaded the native courtesy copies to the Box folder provided by your office, under the folder:

Moring - DSHS Request to Revise - Native Courtesy Copies - 2026-06-06

The Box materials are organized to match the request letter's Enclosure Index:

Folder 01_CONTROLLING_SUBMISSION contains the controlling documents, which are the same three files attached to this email.

Folder 02 contains the June 5, 2026 determination, the underlying complaint, and your transmittal email of the determination.

Folders 03–09 contain native and as-produced source files organized by exhibit number, including DSHS's record productions organized by ORR number in Folder 03, the City of Mount Pleasant source documents and crosswalk in Folder 04, and Supplemental Exhibit 7 materials in Folder 09, provided as corroborative only.

Folder 08 contains the source files supporting Exhibit 6, including the Appendix A source files, the verification report confirming those files against their listed MD5/SHA-256 digests, and the hash-comparison report for the Notice of Inspectional Observations discussed in the request.

Folder 00_READ_ME_FIRST contains a ReadMe, folder index, and complete hash manifest for the native courtesy package as transmitted. The manifest's own checksums are provided in an accompanying text file. Folder 99 contains store-only zip archives of each exhibit set for download and integrity convenience.

Please confirm that your office can access the uploaded Box materials. If your office would prefer any portion of the materials by USB, email attachment, or another transfer method, I will provide them promptly.

I request written notice of any determination or action taken on this request.

Respectfully,

Kyle Moring
[redacted] | [redacted]

> On Jun 5, 2026, at 6:46 PM, Kent Richardson <Kent.Richardson@oag.texas.gov> wrote:
>
> Mr. Moring,
>
> Attached is the final determination of this office concerning your complaint under 552.3215 PIA against the Department of State Health Services. Also attached is a copy of your complaint.

Thank you.

Kent Richardson

Deputy Division Chief

Criminal Prosecutions Division

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