**From:** [redacted]
**Subject:** Re: Public Information Act Request – Records Concerning DA Review of Public Information Complaint Against City of Mount Pleasant
**Date:** May 29, 2026 at 12:06 PM
**To:** Kyle Moring [redacted]

We should make an appointment for you to review these items at my office because almost all of the records are the information you sent to me. I have a few emails between myself and Kent Richardson, which I will send to you, but I have no text, instant messages, emails or any other form of electronic communications or any other type of communications between myself and anyone else concerning your complaint.

May 29, 2026 11:50 AM, "Kyle Moring" <[redacted]> wrote:

> Mr. Bailey,
>
> Pursuant to the Texas Public Information Act, Chapter 552 of the Texas Government Code, I request access to and copies of all public information maintained by the Titus County District Attorney's Office concerning the review, handling, evaluation, and determination of my Public Information Complaint Against the City of Mount Pleasant, including the May 29, 2026 determination issued by District Attorney Charles C. Bailey.
>
> This request includes, but is not limited to, the following records:
>
> 1. All correspondence, emails, letters, memoranda, messages, notes, file entries, routing records, intake records, logs, calendars, task assignments, or other records concerning my complaint, any supplemental material I provided, and the May 29, 2026 determination.
>
> 2. All records reflecting what materials were received, reviewed, considered, relied upon, or not reviewed by the District Attorney's Office before issuing the May 29, 2026 determination.
>
> 3. All correspondence or communications between the Titus County District Attorney's Office and the Texas Office of the Attorney General concerning my complaint, the OAG's May 22, 2026 determination, any alleged criminal violations, any PIA enforcement issue, or any TOMA-related issue.
>
> 4. All correspondence or communications between the Titus County District Attorney's Office and the City of Mount Pleasant, the City Attorney, any City employee or official, or any representative of the City concerning my complaint, the OAG determination, the May 29 DA determination, the City's PIA responses, alleged criminal violations, or TOMA-related issues.
>
> 5. All internal communications among District Attorney's Office personnel concerning my complaint, the OAG determination, the May 29 determination, the alleged criminal violations referenced by OAG, or any TOMA-related issue.
>
> 6. All records concerning the USB drive I delivered to your office, including records reflecting receipt, custody, handling, scanning, copying, access, review, non-review, file inventory, file listing, metadata extraction, virus scan, upload, storage, or any communication about the USB drive.
>
> 7. All records identifying the date and time the USB drive was received, who received it, who had access to it, whether it was opened or reviewed, and whether any contents of that USB drive were considered before the May 29, 2026 determination was issued.
>
> 8. All records reflecting whether the District Attorney's Office opened a case file, matter file, complaint file, review file, intake file, or other administrative file concerning my complaint.
>
> 9. All records reflecting whether the District Attorney's Office made any determination on alleged criminal violations referenced in the OAG's May 22, 2026 determination, including whether any such matter was declined, not reviewed, referred, closed, or otherwise resolved.
>
> 10. All records reflecting whether the District Attorney's Office reviewed any TOMA-related issue referenced in or related to my complaint.
>
> Please construe this request to include records in any medium, including paper records, emails, attachments, text messages, instant messages, electronic files, handwritten notes, audio recordings, logs, calendars, metadata, and records maintained on any official or personal device or account if the record concerns official business. The OAG's PIA Handbook recognizes that public information may exist in many media, including emails, text messages, electronic communications, sound recordings, and computer-stored data.
>
> Please produce the records electronically, preferably by email or downloadable link, and in native electronic format where available, including attachments.
>
> If any responsive information is withheld, please identify the specific statutory exception or previous determination relied upon for

each category of withheld information. If your office contends an Attorney General ruling is required, please provide me with the written notice and copy of the request for ruling required by the PIA. The OAG states that when a governmental body seeks an ORD ruling, it must provide the requestor written notice and a copy of its written communication to ORD within 10 business days.

If your office determines it has no responsive records for any category above, please provide the written notice required by Government Code §552.221(f).

This request is for existing records only and does not require the creation of new information.

Respectfully,

Kyle Moring

[redacted] | [redacted]

**From:** [redacted]
**Subject:** Fwd: FW: Urgent Council Notice – Unredacted MPPD Case Report Released in TPIA Production / Outside Reporting and Ethics Agenda Request
**Date:** June 6, 2026 at 6:56 AM
**To:** Kyle Moring [redacted]

C

-------- Forwarded message -------
From: "Lea Ream" <[redacted]>
To: "Chuck Bailey" <[redacted]>
CC: "Austin Beck" <[redacted]>
Sent: May 29, 2026 6:52 PM
Subject: FW: Urgent Council Notice – Unredacted MPPD Case Report Released in TPIA Production / Outside Reporting and Ethics Agenda Request

Mr. Bailey,

Please see email below regarding issues raised regarding Kyle Moring. My associate, Austin Beck, and I would appreciate it if you have time to discuss this matter sometime next week.

Regards,

Lea A. Ream

Davidson Troilo Ream & Garza, P.C.

601 Northwest Loop 410 #100,

San Antonio, TX 78216

[redacted] Office

[redacted] Direct

**From:** Kyle Moring <[redacted]>
**Sent:** Thursday, May 28, 2026 1:49 PM
**To:** Austin Beck <[redacted]>
**Cc:** Wesley Lyon <[redacted]>; Carl Hinton <[redacted]>; Debbie Corbell <[redacted]>; Kelly Redfearn <[redacted]>; Jonathan Hageman <[redacted]>; Melanie Knight <[redacted]>; Rob Vine <[redacted]>; Candias Webster <[redacted]>; Lea Ream <[redacted]>
**Subject:** Re: Urgent Council Notice – Unredacted MPPD Case Report Released in TPIA Production / Outside Reporting and Ethics Agenda Request

Mr. Beck,

I acknowledge receipt of your email.

I am replying to the same recipients because your response was sent to the Mayor and City Council, and I want the record to be clear for all recipients of that email. I am not asking the Mayor or any Councilmember to deliberate, discuss, decide, or reply-all regarding this matter. Any substantive response should be directed through City administration, the City Secretary, the Mount Pleasant Police Department, or counsel as appropriate.

For clarity, I did not request unredacted criminal case information, and I did not obtain the record through unauthorized access, circumvention, or any request for confidential law enforcement information. The City made the initial disclosure by placing the file in the City's TPIA/SharePoint production folder and making it available to

**From:** [redacted]
**Subject:** Re: Request for Conflict Review and Voluntary Recusal – MPPD Case No. [redacted]
**Date:** April 7, 2026 at 2:39 PM
**To:** Kyle Moring [redacted]

Mr. Moring:

I am in receipt of your request for conflict review. I do not agree with the premise of your request, because I do not represent any of the parties in this matter. I represent the State of Texas. I do not have a conflict.

Thank you,

Chuck Bailey

April 7, 2026 2:29 PM, "Kyle Moring" <[redacted]> wrote:

> District Attorney Bailey,
>
> Attached please find my Request for Conflict Review and Voluntary Recusal concerning MPPD Case No. [redacted], together with the conflict attachments packet referenced in the letter.
>
> This request is limited to whether the documented circumstances reflected in the enclosed materials permit continued participation by your office consistent with your prosecutorial obligations. I respectfully request written acknowledgment of receipt and, in due course, a written determination regarding your office's conflict status in this matter.
>
> A copy of this request and the enclosed materials will also be provided to the Office of the Attorney General, Criminal Prosecutions Division, under File No. L260017200.
>
> Thank you for your time and consideration.
>
> Respectfully,
>
> Kyle Douglas Moring
>
> [redacted] | [redacted]

# Ream and Bailey: May 29–June 1 scheduling correspondence

Reformatted from source email text. Selected messages are complete; repeated quoted histories and transport headers are omitted.

### May 29, 2026 · 6:52 p.m. · Ream to Bailey; Beck copied

Mr. Bailey,

Please see email below regarding issues raised regarding Kyle Moring. My associate, Austin Beck, and I would appreciate it if you have time to discuss this matter sometime next week.

Regards,
Lea A. Ream

### May 29, 2026 · 7:55 p.m. · Bailey to Ream

Ms. Ream,

Monday afternoon would be the best time for me to speak with you. I have court Tuesday and Wednesday.

Thank you,
Chuck Bailey

### May 30, 2026 · 12:47 p.m. · Ream to Bailey; Beck copied

Thank you, we will call you Monday afternoon.

Regards,
Lea A. Ream
DTRG

### June 1, 2026 · 5:06 p.m. · Ream to Bailey; Beck copied

Mr. Bailey,

My apologies that the afternoon got away from me.

Perhaps we can discuss on Thursday.

Regards,
Lea A. Ream
DTRG

### June 1, 2026 · 6:18 p.m. · Bailey to Ream

No problem at all. Thursday morning and afternoon are both open. After 4:00 pm tomorrow or Wednesday would probably work, as well.