From: **Kyle Moring** [redacted]
Subject: Re: PIA Complaint - Titus County District Attorney
Date: June 9, 2026 at 6:34 AM
To: Kent Richardson [redacted]
Cc: CrimPros Intake [redacted]

KM

Mr. Richardson,

I am submitting this as a separate supplement to my pending Request for Revision regarding the April 17, 2026 determination concerning the Titus County District Attorney's Office.

This supplement concerns the April 5, 2026 production in which District Attorney Charles C. Bailey forwarded me correspondence between himself and April Nipp of the Mount Pleasant Police Department regarding MPPD Case No. [redacted], together with attachments. Your office already has the documents involved in this issue through prior submissions, so I am not reattaching or redistributing the unredacted records with this supplement.

After further review yesterday, I identified apparent unredacted sensitive information within the April 5 production, including social security number information and law enforcement/child-related materials. I did not realize those identifiers were present when the materials were previously submitted through official channels.

I recognize that Texas Government Code § 552.147 is more nuanced. Section 552.147 permits redaction of a living person's social security number without requesting an Attorney General decision, but it does not itself make a living person's social security number confidential under that section. I therefore identify the SSN issue as a redaction, records integrity, and production-review concern, not as the primary basis for a § 552.352 issue.

The stronger confidentiality concern appears to involve information potentially made confidential by Texas Government Code § 552.101 in conjunction with Family Code § 261.201 or other applicable law. The production appears to include DFPS/child-related investigative materials and information concerning CPS history or DFPS involvement of third parties. To the extent those materials are reports, records, communications, or working papers used or developed in a Chapter 261 investigation or related services, they appear potentially confidential and not subject to general public release under Chapter 552.

My concern is not limited to the victim's identifying information. The issue may also include DFPS/CPS-history information concerning other individuals, if that information came from DFPS records, was included in DFPS communications, or was used or developed in the child-related investigative process. I also understand that a victim's later adult status does not automatically authorize general public release to me as an ordinary requestor.

Texas Government Code § 552.352 provides that a person commits an offense if the person distributes information considered confidential under Chapter 552, and that a violation constitutes official misconduct. I am not asking your office to infer criminal intent from the forwarding event alone. I am asking that the April 5 production be considered as new, relevant, and persuasive information bearing on whether TCDA's handling of my February 27, 2026 request was fully cured and whether TCDA's production practices complied with Chapter 552.

This issue is especially important because the production came from the Titus County District Attorney's Office. As an elected prosecuting authority performing a statutory § 552.3215 review function, that office should maintain a high standard of records integrity, production accuracy, confidentiality review, and preservation of source-record context. Where production completeness and the scope of a formal public information review are disputed, the office should be able to account for whether sensitive or confidential information was reviewed, redacted, withheld, or permissibly released before distribution.

This supplement is not a republication of the sensitive material. It is a notice that, upon later review, I discovered sensitive identifiers and potentially confidential child-related/law enforcement materials in documents already in the possession of your office and previously transmitted through official channels. I request that any review of the underlying unredacted materials occur under confidential handling.

I respectfully request that your office consider whether TCDA should provide a verified supplemental response addressing the following:

1. Whether the April 5, 2026 production was reviewed for confidential information before it was sent to me.
2. Whether the attachment set included information confidential under Chapter 552, including information made confidential by § 552.101 in conjunction with Family Code § 261.201 or other law.
3. Whether any confidential information was distributed to me without redaction, authorization, or an Attorney General ruling.
4. Whether TCDA contends that any special right of access, law enforcement purpose, prior release, or other legal basis authorized the unredacted production.
5. Whether TCDA has taken any corrective or secure-handling action regarding the April 5 production.
6. Whether the April 17 determination's cured/no-action conclusion should be revised or supplemented in light of the April 5 production.

I also want to clarify the relationship between this issue and my separate native-format supplement. Even if the April 5 forward was provided as an .eml file of Mr. Bailey's forward to me, that does not necessarily mean the original Bailey–Nipp exchange and each attachment were produced in the same form in which TCDA maintained them. A forwarded message is a new message created by the forwarding account. It may preserve visible quoted content and some attachments, but it does not necessarily preserve the original messages' full headers, Message-ID, In-Reply-To, References, routing data, BCC-related information, server-level metadata, or original thread structure.

For that reason, the April 5 production raises two related but distinct questions: first, whether the production improperly distributed confidential or sensitive information; and second, whether the production fully satisfied the format, completeness, and integrity aspects of my February 27 request.

Respectfully,

Reading copy | selected source page 1 | personal identifiers removed

Kyle Moring
[redacted] | [redacted]

> On Jun 6, 2026, at 11:30 AM, Kyle Moring <[redacted]> wrote:
>
> Mr. Richardson,
>
> Attached is a narrow supplemental status update for OAG File No. L260017200.
>
> This submission is provided as procedural context only and is not submitted as a new standalone complaint. It documents subsequent communications forwarded to me by District Attorney Charles C. Bailey involving City outside counsel, as well as my June 6 secure-handling clarification to Mr. Bailey regarding City-produced materials previously submitted to OAG and TCDA.
>
> The attachment does not include, reproduce, quote, or disseminate the unredacted MPPD report. It identifies the issue only by production context and related correspondence.
>
> The main points are:
>
> 1. Mr. Bailey forwarded communications from Lea Ream, copying Austin Beck, requesting to discuss issues raised regarding me.
> 2. The forwarded chains show follow-up scheduling communications between Mr. Bailey and Ms. Ream.
> 3. I clarified to Mr. Bailey that I was not disseminating the unredacted record and requested secure-handling instructions regarding the USB drives in his possession.
>
> I also want to clarify the scope of what I have separately provided to the Titus County District Attorney's Office. Because my concerns include the scope, independence, and reliability of the local review process, I have not separately submitted the newer City-related supplemental materials to Mr. Bailey, except for the correspondence specifically reflected in this submission. If your office believes additional review by the Titus County District Attorney's Office is required for any of these newer City-related materials, I authorize your office to forward the relevant supplemental materials to Mr. Bailey for that limited purpose.
>
> I also want to update your office regarding my mandamus action against the City of Mount Pleasant. The case has been filed, and I am currently awaiting action on the proposed orders submitted in that matter. I will provide any file-stamped orders, signed orders, or other relevant court filings once available if they are relevant to your review.
>
> Exhibit D is included only as scope/status context regarding Mr. Bailey's TOMA determination and is separate from the TCDA production-format issues and the City of Mount Pleasant PIA Request for Revision.
>
> Respectfully,
>
> Kyle Moring
> [redacted] | [redacted]

2026-06-06 - Supplemental Status Update - Bailey City-...

> On Jun 6, 2026, at 10:00 AM, Kyle Moring <[redacted]> wrote:
>
> Mr. Richardson,
>
> Attached is a combined supplemental clarification and exhibit binder for my pending Request for Revision regarding the April 17, 2026 determination concerning the Titus County District Attorney's Office.
>
> This submission is not a new standalone complaint. It is a separate supplement to the existing Request for Revision concerning the April 17 TCDA determination.
>
> The supplement addresses two related issues.