From: **Kent Richardson** [redacted]
Subject: RE: PIA Complaint - Titus County District Attorney
Date: July 22, 2026 at 11:52 AM
To: Kyle Moring [redacted]

KR

Mr. Moring,

1. Yes, I believe all remaining actionable issues have been addressed.
2. Yes, but I believe you are be able to submit a separate complaint under 552.328 if you choose to do so.
3. With respect to this issue, because the circumstances occurred after the handling of your request and involved a separate request for information, it will not be considered in the review of this complaint.
4. I have received confirmation that Mr. Bailey will provide the email message(s) in question as attachments instead of forwarding as he originally provided them.

Thank you.

Kent Richardson
Deputy Division Chief
Criminal Prosecutions Division
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711-2548
[redacted] Fax [redacted]

From: Kyle Moring <[redacted]>
Sent: Monday, July 20, 2026 3:12 PM
To: Kent Richardson <[redacted]>
Subject: Re: PIA Complaint - Titus County District Attorney

Mr. Richardson,

Thank you for your response. I understand that you confirmed from Mr. Bailey that no further email or video currently exists within his office relating to what you described as the "MPPD conversation," and that you believe alleged § 552.221 response issues should be addressed through the § 552.328 complaint process.

To ensure that I understand the scope of your response and preserve an accurate record, please clarify the following:

1. Is your email intended to close my entire Request for Revision, or only the narrower question whether an additional email or video currently remains unproduced?
2. Does your conclusion address the historical production chronology and completeness representation – specifically, Mr. Bailey's March 31 representation that all responsive information had been released, followed by later productions on April 3 and April 5, including the preexisting February 5–6 Bailey–Nipp exchange – or should that issue now be presented through the § 552.328 process?
3. What is the disposition of my June 9 supplement concerning the April 5 disclosure of DFPS/CPS-related material, reporter-identifying information, and two third-party Social Security numbers? Was that issue considered, declined, referred to another process, or left unresolved?
4. What is the disposition of my June 6 native-format supplement concerning the February 27 request and the production of forwarded-inline emails rather than native or metadata-preserving records? Was that issue considered, referred to the § 552.328 process, or left unresolved?

If your email is intended as the final disposition of the entire Request for Revision, I respectfully request written confirmation identifying which of these distinct issues were resolved, declined, referred, or left unresolved.

Respectfully,

Kyle Douglas Moring
[redacted] | [redacted]

> On Jul 20, 2026, at 11:47 AM, Kent Richardson <[redacted]> wrote:
>
> Mr. Moring,
>
> I wanted to let you know that I have confirmed from Mr. Bailey that no further email or video exists within his office related to the MPPD conversation. Therefore, I believe the complaint should be closed as all responsive information has been released.
>
> Additionally, I noticed that for this complaint I actually issued a determination on an apparent 552.221

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Additionally, I noticed that for this complaint I actually issued a determination on an apparent 552.221 violation which I should have deferred to the new complaint process found in 552.328 which covers all violations of 552.221. (All complaints that have a specific administrative review process must be handled that way prior to seeking review that would involve court action.) I note this because your more recent correspondence indicates you may have a similar complaint based on a newer request for information (July 13). Also, while not specifically cited in the DSHS complaint determination, the general complaint may likewise boil down to a 221 violation.

So, I just wanted to make sure you were aware of this other complaint procedure that should be used first to address these alleged 221 violations.

I believe the location for submitting 328 complaints is currently the same location for general complaints which you may already be familiar with but is linked herehttps://oag.my.site.com/OpenRecords/s/flow/CORA_External_Create_Complaint

For your July 13 request for information, if you have complaints beyond 221 related issues or a cost complaint, you will still be able to use the 3215 process for any other complaint.

Let me know if you have any questions.



Kent Richardson
Deputy Division Chief
Criminal Prosecutions Division
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711-2548
[redacted]
[redacted] Fax
[redacted]

From: Kyle Moring <[redacted]>
Sent: Thursday, July 16, 2026 9:27 PM
To: Kent Richardson <[redacted]>
Subject: Re: PIA Complaint - Titus County District Attorney

Mr. Richardson,

I am submitting this email as supplemental factual information for your pending review of my § 552.3215 complaint and Request for Revision concerning the Titus County District Attorney's Office.

I understand your July 14 instruction that questions concerning the request for an Attorney General ruling, the asserted exception, and OR-26-037717-RR should be directed to the Open Records Division. I am not asking you to decide the pending ruling request or determine whether the asserted exception applies.

I am providing this information because the July 16 production appears relevant to the separate issues already raised in my § 552.3215 matter concerning the office's records searches, completeness representations, production practices, and handling of electronically maintained records.

My July 13 request expressly requested responsive electronic records in the electronic medium in which they are maintained or another reasonably available metadata-preserving format. It specifically requested:

- Email as .eml or .msg.
- Original attachments and filenames.
- Sender, recipient, and timestamp fields.
- Available message-header information, including Message-ID, In-Reply-To, and References.
- That newly forwarded, rendered, or scanned copies not be substituted when the original mailbox item remained available for export.

On July 16, Mr. Bailey transmitted two PDF files and stated that they were documents responsive to the request.

The first PDF is a scanned image of an electronic email from Camp County Lieutenant Randy Huggins to Mr. Bailey and members of his staff. The scan itself identifies an original electronic attachment named **1203_001.pdf**, with a displayed size of 6.1 MB, and reflects an earlier electronic transmission from [redacted]. Mr. Bailey did not produce the native email, its available original headers, or the original electronic attachment

The second PDF is a separately scanned copy of the indictment under a scanner-generated filename rather than the original filename **1203_001.pdf** shown in the email. I am not attaching or redistributing that document because it identifies the alleged child victim. I have preserved it as received.

I have not accepted the derivative scans as satisfying the electronic-format provisions of my request. At this time, however, I do not intend to engage in additional correspondence with Mr. Bailey about the deficiency. I am preserving the production and documenting it through the appropriate official channels.

I respectfully ask that you:

1. Associate this information with my pending § 552.3215 complaint and Request for Revision.

2. Consider whether the July 16 production is relevant to the previously raised questions concerning the office's search, completeness, and production practices.

3. Advise whether this information may be considered as supplemental evidence in the existing matter or must be submitted as a separate § 552.3215 complaint.

I recognize that any issue affecting the pending request for ruling itself must be presented to ORD separately, and I am not asking you to act in place of ORD.

I am attaching only:

1. The relevant electronic-format provisions of my July 13 request.

2. Mr. Bailey's July 16 production email.

3. The scanned Huggins email showing the existence and original filename of the electronic attachment.

I am not attaching the indictment or any minor-identifying information.

Respectfully,

Kyle Douglas Moring
[redacted] | [redacted]

On Jul 10, 2026, at 5:09 PM, Kent Richardson <[redacted]> wrote:

Mr. Moring,

I believe you have noted that the request was made to the TCDA prior to the record in question even being in existence. You also correctly note that the PIA does not require that a governmental body produce records not in existence at the time of the request regardless of whether they come into existence before production is made on the request. Therefore, I believe you would have to make a new request for the information to get that particular information from the TCDA.

<image003.png>

Kent Richardson
Deputy Division Chief
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Office of the Attorney General
P.O. Box 12548
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