From: **Kent Richardson** Kent.Richardson@oag.texas.gov
Subject: RE: PIA Complaint - City of Mount Pleasant
Date: July 8, 2026 at 11:36 AM
To: Kyle Moring [redacted]

KR

Mr. Moring,

To answer your first question, yes, the determination issued will remain the determination unless it becomes necessary to amend at some future date.

To answer your second question, a review of the certifications you supplemented has also suspended due to the closure of the complaint as indicated in deference to the court action.

With respect to the request to reconsider the complaint against the Titus County District Attorney, I will also follow-up with Mr. Bailey to address the possible discrepancies in the timeline you note as well as to re-confirm complete release.

Thank you.

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From: Kyle Moring <[redacted]>
Sent: Tuesday, July 7, 2026 8:55 PM
To: Kent Richardson <Kent.Richardson@oag.texas.gov>
Subject: Re: PIA Complaint - City of Mount Pleasant

Mr. Richardson,

Thank you for the update.

I understand your position that the request for further review of the City of Mount Pleasant complaint will be closed in deference to the pending mandamus action, consistent with ORD's handling of related matters. I also understand that you are continuing to work on the DSHS and Fort Worth requests for reconsideration.

I would appreciate clarification on three points.

First, with respect to the City of Mount Pleasant matter, please confirm whether the May 22, 2026 determination will remain the operative public determination without revision, or whether your office will issue any notation or supplemental closure notice clarifying that further review is being closed because the matter is now before the trial court, rather than because the supplemental counter-evidence was reviewed and rejected.

My concern is that the mandamus action may resolve production, search, withholding, and access issues going forward, but it does not necessarily resolve the separate problem that the existing OAG determination remains a public record reflecting no-violation / cured findings based on City representations that I have since disputed with City records, third-party records, later City productions, ORD certification materials, and court filings. I am trying to understand how closure in deference to mandamus resolves that issue if the unrevised determination remains the public record.

Second, I specifically request clarification regarding the City's signed certifications to ORD. The certification materials produced through PIR No. R032947 show multiple City certifications, executed by Candias Webster, selecting the option that the City had made available "all existing responsive information." I have provided your office with substantial counter-evidence showing that several of those certifications appear materially disputed by City records, third-party records, later City productions, and the City's own later admissions.

That issue is not merely a production dispute. It goes to accountability. If the City certified complete production to ORD, and those certifications are materially contradicted by the record, then closing the Request for Revision solely because a mandamus case is pending appears to leave the certification issue unresolved. Please clarify whether your office has reviewed the certification evidence as part of the Request for Revision, and whether the closure in deference to mandamus means your office is declining to address the certification/accountability issue.

This is also why I continue to press the issue despite the time and effort involved. I have pursued these matters more persistently than most requestors realistically could, and I have been able to compare City certifications, City productions, third-party agency records, later productions, OAG records, and court filings across many months. Most requestors would not have the time, resources, or record access to identify those contradictions. If signed certifications, no-records positions, incomplete productions, and contradictory representations are left unaddressed when the record materially disputes them, then the same practices can affect other requestors without meaningful consequence. My concern is therefore not only about my own records requests; it is about whether the public information process remains reliable for anyone who does not have the ability to pursue the issue this far.

Third, please clarify the status of my separate Request for Revision concerning the April 17, 2026 determination regarding the Titus County District Attorney's Office / Charles C. Bailey. That request is separate from the City of Mount Pleasant mandamus action. The mandamus case is against the City of Mount Pleasant and does not address TCDA's production to me, TCDA's response to my February 27 request, the later Bailey / Nipp production, the native-format / forwarded-email issue, or the scope of Mr. Bailey's review of my City complaint.

This issue also ties directly into the TCDA Request for Revision. Mr. Bailey issued a no-violation determination regarding the City while his office had, or appears to have had, City / MPPD records in its possession that were relevant to the City's no-records and complete-production representations. He later produced some of those records to me, including materials that appear to contain unredacted social security number information and DFPS / CPS history-related information. That raises a separate issue that mandamus against the City will not resolve: whether TCDA's review of the City complaint was complete and reliable, and whether TCDA's own production practices complied with Chapter 552 and appropriate confidentiality / redaction standards.

Your email refers to the DSHS and Fort Worth requests for reconsideration, but it does not address the TCDA / Bailey Request for Revision. Please confirm whether that TCDA request remains pending, has been closed, or will be addressed separately.

I am not submitting additional evidence in this email. I am asking for clarification of the procedural status of the City Request for Revision, the City certification materials, and the separate TCDA / Bailey Request for Revision so I can accurately understand what remains pending before your office and what issues your office considers resolved.

Respectfully,

Kyle Douglas Moring
[redacted] | [redacted]

On Jul 7, 2026, at 5:46 PM, Kent Richardson <Kent.Richardson@oag.texas.gov> wrote:

Mr. Moring,

While I have been concentrating on resolving the DSHS and Fort Worth requests for reconsideration, I wanted to note that like the Open Records Division, your request for further review of the Mt. Pleasant complaint will likewise be closed in deference to the mandamus action you have undertaken to address the various items of your PIA complaint. That process should resolve the issues you have raised in your complaint.

I will update you as soon as I can on resolving the other two requests for reconsideration once they are complete.

Thank you.

<image003.png>

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