From: Kyle Moring [redacted]
Subject: Electronic Resubmission of Complaint Package – Tex. Gov't Code § 552.3215(i) / City of Mount Pleasant
Date: March 12, 2026 at 1:31 PM
To: crimprosintake@oag.texas.gov

KM

Good afternoon,

Per our telephone conversation today, I am electronically resubmitting the complaint package that I previously mailed to the Office of the Attorney General. Attached is the PDF binder containing that submission.

The attached binder is dated February 24, 2026. The cover letter within the binder is addressed to the Open Records Division because that was the office to which I originally mailed the packet before I was advised that the matter should instead be directed to the Criminal Prosecutions Division. Please treat this email and attachment as my submission to Criminal Prosecutions Intake for review.

The complaint is submitted under Tex. Gov't Code § 552.3215(i) and concerns an alleged pattern of Texas Public Information Act violations by the City of Mount Pleasant. As reflected in the attached materials, I submitted the underlying written complaint to Titus County Criminal District Attorney Charles C. Bailey on November 17, 2025, provided supporting documents on November 24, 2025, and more than 90 days passed without an enforcement action being brought.

The attached binder includes the cover letter, chronology, exhibit index, and supporting exhibits. The original mailed packet also included a USB drive containing supporting materials. If your office would prefer the underlying files in their original or native formats rather than the consolidated PDF binder, I can provide them separately.

In light of the volume and complexity of the underlying record, the attached PDF binder is intended as a consolidated complaint package for intake and review. I also maintain additional corroborating materials that are not fully captured in the binder, including audio recordings, transcripts, underlying source records, and related correspondence involving City officials and other relevant parties. I can provide those materials upon request if they would assist your review.

Please confirm receipt of this email and attachment and let me know if any additional materials are needed.

Thank you for your time and attention to this matter.

Respectfully,

Kyle Douglas Moring

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2026-02-24 - TXOAG - Complete OAG Complaint Package.pdf
5.6 MB