From: Kyle Moring [redacted]
Subject: Re: Texas Public Information Act Request - Walmart-related email communications and keyword search (01/01/2024–12/29/2025)
Date: February 4, 2026 at 7:44 AM
To: Candias Webster cwebster@mpcity.org
Cc: Austin Beck abeck@dtrglaw.com, Rob Vine rvine@mpcity.org, [redacted], Wesley Lyon wlyon@mpcity.org

Ms. Webster,

Thank you for the City's production of records responsive to my December 30, 2025 Texas Public Information Act requests. I have now reviewed both productions: (1) the Walmart-related production (19 emails) and (2) the production responsive to the "Kyle Moring / [redacted] / whistleblower / OSHA" search (366 emails). I am writing to request clarification and, as appropriate, a supplemental search/production.

First, charges and itemization/reconciliation. I accepted the City's itemized estimates ($54 for the Walmart-related request and $99 for the "Kyle Moring/whistleblower/OSHA" request). After reviewing what was produced, I am unable to reconcile the labor time reflected in the estimates with the results returned, particularly given the significant difference in volume between the two productions. Please provide the supporting details for the labor time charged for each request (e.g., the underlying time entries, task notes, or an internal breakdown showing how the hours were calculated). If the City issued a final invoice that differs from the estimates I accepted (or if any additional processing fee was applied), please provide a copy of the final invoice(s) and explain any variance.

Second, completeness and request for supplemental search/production. Based on my knowledge of City communications regarding these matters, I believe additional responsive emails and/or attachments exist beyond those produced for both requests. Please confirm the scope of the search actually performed for each request (including date ranges applied, custodians/accounts searched, systems/repositories searched, and the keywords/domains/filters used). I any reasonable additional search steps remain to be performed, please proceed with a supplemental search and provide a rolling supplemental production.

Third, search methodology documentation (previously requested). In my acceptance emails, I requested documentation of the search methodology so I could verify that the labor charges reflect a reasonably efficient search. That documentation was not included with either production. Separately, and not as a condition of the requests above, please provide, to the extent it exists as part of the City/MPPD's ordinary records, system logs, audit trails, export reports, or time entries:

1. The specific search queries/parameters executed for each request (including any date range and keyword/domain criteria used)
2. The email systems, archives/eDiscovery platforms, and repositories searched
3. The custodians/accounts/shared mailboxes included in the search
4. A breakdown of time spent on (i) executing/processing the search and exporting results versus (ii) review/redaction (if any)
5. The name and title of the individual(s) who performed and/or supervised the search/export

If the City/MPPD does not maintain such logs/reports/time-entry breakdowns in the ordinary course, please confirm that in writing and identify (by name and title) who performed/supervised the search.

Records retention/preservation (attached for reference): For context, I am attaching the City's records management ordinance/records control schedule materials that I have been provided. I am referencing these materials only to understand whether the City's retention policies or any destruction authorization might explain the apparent gaps in the productions. If the City contends that potentially responsive records no longer exist due to retention/destruction, please identify the applicable record series/retention authority and confirm whether any responsive records were destroyed after the City received my December 30, 2025 requests.

By way of example, the City's ordinance describes municipal records to include electronic media and provides that records otherwise eligible for destruction are not destroyed while an open records request is pending. The schedules also reflect multi-year retention for correspondence/subject files and administrative correspondence.

If providing any of the requested search documentation or reconciliation detail would require the creation of new information not maintained in the ordinary course or would result in additional charges beyond what I already paid/accepted, please advise in advance with an updated itemized estimate before incurring any additional cost.

My preferred method of communication and delivery is email at [redacted]. Rolling production is acceptable. Please also provide an anticipated date for (a) the search/charge reconciliation information and (b) any supplemental production.

With gratitude,

Kyle Moring

[redacted] | [redacted]

City of Mount PleasantOCR.pdf