

CAUSE NO. 471-09546-2025

SHANNON AYRES	§	
Texas Education Director,	§	
Citizens Defending Freedom USA,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
v.	§	____TH JUDICIAL DISTRICT
	§	
PLANO INDEPENDENT SCHOOL	§	
DISTRICT,	§	
	§	COLLIN COUNTY, TEXAS
Defendant.	§	
	§	

PLAINTIFF’S ORIGINAL PETITION FOR WRIT OF MANDAMUS

Plaintiff Shannon Ayres, acting in her official capacity as Texas Education Director for Citizens Defending Freedom USA, files this Original Petition for Writ of Mandamus against Plano Independent School District (“PISD”) and respectfully shows:

SUMMARY OF THE CASE

1. This is a straightforward Public Information Act mandamus suit. On October 8, 2025, Plaintiff submitted a written request for records concerning mold hazards in Plano ISD schools. PISD has provided no written response whatsoever in the ensuing fifty-plus days — no documents, no cost estimate, no clarification request, and no Attorney-General opinion request — thereby waiving all exceptions to disclosure under Tex. Gov’t Code § 552.302. Multiple media outlets reported school closures and health complaints due to suspected mold at property managed by PISD. For this reason, on November 13, 2025, Plaintiff also filed a formal complaint with the Texas Attorney General’s Open Records

Division. On November 26, 2025, Plaintiff contacted and left a message at PISD. PISD still has taken no action required by law. Plaintiff seeks a writ of mandamus compelling immediate production of the requested records (without redaction) and an award of attorney's fees. Because the health of students and staff remains at risk, Plaintiff respectfully requests expedited consideration.

DISCOVERY CONTROL PLAN

2. Discovery will be conducted under Level 2 of Texas Rule of Civil Procedure 190.3.

PARTIES

3. a. Plaintiff Shannon Ayres is the requestor in this suit under TPIA, acting in her official capacity as Texas Education Director for Citizens Defending Freedom USA, a non-profit organization dedicated to defending constitutional freedoms, including access to public information related to education and public health. Plaintiff may be contacted through counsel.
- b. Defendant Plano Independent School District is a governmental body subject to TPIA and is the entity that has failed to supply the requested public information. Pursuant to Texas Civil Practice and Remedies Code § 17.024(b), PISD may be served through its Superintendent, Dr. Theresa Williams, at the administrative offices located at 2700 W. 15th Street, Plano, Texas 75075, or its Public Information Officer at 2700 W. 15th Street, Plano, Texas 75075.

JURISDICTION & VENUE

4. This Court has jurisdiction over this lawsuit pursuant to Texas Government Code § 552.321(a). Venue is mandatory in Collin County pursuant to Texas Government Code § 552.321(b) because the main offices of Defendant PISD are in this county.

FACTS

5. On **October 8, 2025**, Plaintiff submitted a written public information request via email to openrecords@pisd.edu — the address PISD directs the public to use (Exhibit A – screenshot of PISD website; Exhibit B – full request email; Exhibit C – delivery and read receipts confirming receipt at 6:38 p.m. on October 8).
6. The request sought the following categories of records from May 1, 2025, forward concerning mold in any PISD facility:
 - a. All reports, complaints, or notifications regarding mold presence, growth, or exposure in any PISD facilities, including schools, administrative buildings, or other district properties.
 - b. All maintenance tickets, work orders, logs, or service requests pertaining to mold inspections, testing, remediation, or related repairs, including efforts by individual teachers in their classrooms.
 - c. All records documenting mold mitigation efforts, including inspection results, testing data, remediation plans, contractor agreements, invoices, progress reports, and completion certifications.

- d. All workers' compensation claims, filings, reports, or related documentation submitted by employees alleging health issues related to mold exposure or indoor air quality issues.
 - e. All communications related to the above, including emails, memos, text messages, internal notes, meeting minutes, and any other written or electronic documents involving district staff, administrators, contractors, vendors, health officials, insurance providers, or other parties.
7. PISD was statutorily required to promptly produce the information or, at minimum, respond in writing within **10 business days — by October 22, 2025** — pursuant to Tex. Gov't Code § 552.221. It has provided nothing.
 8. On **November 13, 2025**, Plaintiff filed a formal complaint with the Texas Attorney General's Open Records Division alleging PISD's violation of the Act (Exhibit D – complaint and filing confirmation). PISD still has not responded or produced any records.
 9. By wholly failing to respond or timely seek an Attorney General opinion, **PISD has waived any and all exceptions to disclosure**. Tex. Gov't Code § 552.302; *City of San Antonio v. Texas Attorney General*, 551 S.W.3d 149, 154 (Tex. 2018). Plaintiff is therefore entitled to the requested records **in complete and unredacted form**.
 10. The urgency of disclosure is underscored by the following publicly reported events in September and October 2025 related to potential mold hazards at PISD facilities that could affect the well-being of students, staff, and the community. (full articles or

screenshots attached collectively as Exhibit E):¹

- a. September 26, 2025 – Texas Scorecard reported PISD had known about mold concerns at Murphy Middle School for weeks, yet initially told parents there were “no health concerns.”²
- b. October 5, 2025 – FOX 4 News reported Murphy Middle School was closed for environmental remediation after air-quality studies detected elevated humidity and visible mold.³
- c. October 6, 2025 – Dallas Morning News and Local Profile reported the abrupt closure of Murphy Middle School after a mold assessment revealed visible mold, mildew, damp carpet, and noticeable humidity.^{4 5}
- d. October 6, 2025 – Texas Scorecard further reported that PISD closed the school for additional mold mitigation less than two weeks after assuring families of no health risks, with parents learning of the closure on short notice.⁶
- e. October 9, 2025 –WFAA reported the school would remain closed for carpet

¹ These reports are offered solely to demonstrate the public-health urgency justifying expedited relief, not for the truth of the matters asserted therein.

² Erin Anderson, *Mom Still Concerned After Plano ISD Addresses ‘Moldy’ Murphy Middle School*, Texas Scorecard (Sept. 26, 2025), <https://texasscorecard.com/local/mom-still-concerned-after-plano-isd-addresses-moldy-murphy-middle-school/>.

³ Amber Kite, *Plano ISD Temporarily Closes Middle School for Environmental Remediation*, FOX4 News (Oct. 5, 2025), <https://www.fox4news.com/news/plano-isd-temporarily-closes-middle-school-environmental-remediation>.

⁴ Lilly Kersh, *Mold, Air Quality Concerns Abruptly Close Plano Middle School for Cleaning*, Dallas Morning News (Oct. 6, 2025), <https://www.dallasnews.com/news/public-health/2025/10/06/mold-air-quality-concerns-abruptly-close-plano-middle-school-for-cleaning/>.

⁵ Matilda Preisendorf, *Plano ISD Temporarily Closes Middle School Building Amid Environmental Concerns*, Local Profile (Oct. 6, 2025), <https://www.localprofile.com/news/plano-isd-closes-middle-school-environmental-concerns-11310607>.

⁶ Erin Anderson, *Plano ISD Closes Moldy Murphy Middle School for More Mitigation*, Texas Scorecard (Oct. 6, 2025), <https://texasscorecard.com/local/plano-isd-closes-moldy-murphy-middle-school-for-more-mitigation/>.

replacement and cleaning, with reopening planned for October 20.⁷

f. October 21, 2025 – Citizen Portal reported additional HVAC remediation and noted earlier testing had found low-level mold.⁸

CAUSE OF ACTION– WRIT OF MANDAMUS

11. PISD has a clear ministerial duty to produce public information or timely assert exceptions. Tex. Gov't Code §§ 552.221, 552.301.
12. PISD has violated that duty.
13. Plaintiff has a clear right to the information, and there is no adequate remedy at law.
14. Mandamus is warranted. Tex. Gov't Code § 552.321(a).

EXPEDITED RELIEF REQUESTED

15. Because children and staff continue to attend PISD facilities with documented mold issues, Plaintiff respectfully requests that this case be set for expedited hearing at the earliest possible date.

ATTORNEY FEES AND COSTS

16. Plaintiff is entitled to recover costs of litigation and reasonable attorney fees pursuant to Texas Government Code § 552.323.

PRAYER

WHEREFORE, Plaintiff prays that the Court:

⁷ Tiffany Liou. *Murphy Middle School Principal Says Campus to Reopen for Students After Environmental Remediations*, WFAA (Oct. 9, 2025), <https://www.wfaa.com/article/news/local/murphy-middle-school-principal-says-campus-reopen-for-students-after-environmental-remediation/287-40692795-87c5-4e1f-92f1-7568724ba6b1>.

⁸ *Plano ISD Updates Bond Work; Murphy Middle Closed Briefly for HVAC Remediation, District Says Issue Addressed*, Citizen Portal (Oct. 21, 2025), <https://citizenportal.ai/articles/5989329/Texas/Plano-ISD-updates-bond-work-Murphy-Middle-closed-briefly-for-HVAC-remediation-district-says-issue-addressed>

a. Issue a writ of mandamus compelling PISD to fully comply with the October 8, 2025 public information request and produce all responsive records, without redaction, no later than ten (10) business days after the date of this Court's order, or by such other date the Court sets;

b. Award Plaintiff reasonable and necessary attorney's fees and court costs;

c. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Martin K. Etwop

Martin K. Etwop

Texas Bar No. 24120215

Jonathan K. Hullihan

Texas Bar No. 24120376

REMNANT LAW

5900 Balcones Drive, # 20675

Austin, TX 78731

Tel.: (512) 720-6218

MEtwop@remnantlawgroup.com

JHullihan@remnantlawgroup.com

ATTORNEYS FOR PLAINTIFF

SHANNON AYRES

Texas Education Director,

Citizens Defending Freedom USA

CAUSE NO. _____

SHANNON AYRES	§	
Texas Education Director,	§	
Citizens Defending Freedom USA,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
v.	§	____ TH JUDICIAL DISTRICT
	§	
PLANO INDEPENDENT SCHOOL	§	
DISTRICT,	§	
	§	COLLIN COUNTY, TEXAS
Defendant.	§	
	§	

PLAINTIFF’S APPENDIX

- | | Exhibit |
|--|----------------|
| 1. October 8, 2025, Plaintiff submitted a written public information request via email to openrecords@pisd.edu – the address PISD directs the public to use – Screenshot of PISD website. | A |
| 2. October 8, 2025, written public information request from Plaintiff to PISD - Full request email. | B |
| 3. October 8, 2025, written public information request from Plaintiff to PISD – Delivery and read receipts confirming receipt at 6:38 p.m. on October 8. | C |
| 4. November 13, 2025, Plaintiff filed a formal complaint with the Texas Attorney General’s Open Records Division alleging PISD’s violation of the Act – Complaint and filing confirmation. | D |
| 5. The urgency of disclosure is underscored by the following publicly reported events in September and October 2025 related to potential mold hazards at PISD facilities that could affect the well-being of students, staff, and the community. Full articles or screenshots attached collectively. | E |

**EXHIBIT A: October 8, 2025, Plaintiff submitted a written public information request via email to openrecords@pisd.edu – the address PISD directs the public to use –
Screenshot of PISD website.**

Open Records

The Open Records Section processes requests for public records made pursuant to the Texas Public Information Act. Plano ISD is a governmental entity separate from the City of Plano.

Need Student Records?

Parent, guardians, students or their representatives must request student records from the campus where the student last attended school.

General Information/Questions?

Requests for general information or general questions not involving requests for records: [Let's Talk! \(/fs/pages/14091\)](/fs/pages/14091)

Submitting Open Records Requests

As provided by the Texas Public Information Act, all open records requests submitted to Plano ISD must be in writing, and submitted in one of the following ways:

1. Electronically submitted through the **Plano ISD Open Records Center** (this is the most efficient way to request and receive records)
2. By mailing your written request via United States mail, addressed to: Plano ISD Open Records Section – Attention Robyn White, 2700 W. 15th Street, Plano, Texas 75075
3. By email to: openrecords@pisd.edu (<mailto:openrecords@pisd.edu>)
4. By submitting your written request in person to the Plano ISD Open Records Section, First Floor, Plano ISD Administration

[Skip To Main Content](#)

Open Records Center

Request open records electronically here

[Plano ISD Open Records Center](#)

[\(https://planotxisd.mycustomerhelpline.com/SessionID=\)](https://planotxisd.mycustomerhelpline.com/SessionID=)

Student Transcripts & Records Requests

[Students Transcripts and Records Requests](#)

[\(/fs/pages/16741\)](/fs/pages/16741)

[Business Calendar](#)
[\(/fs/pages/16686\)](/fs/pages/16686)

Important: Be Specific

We may ask for clarification of your request if it is not clear what information

Building, 2700 W. 15th Street, Plano, Texas 75075

Charges & Fees

Plano ISD charges fees authorized by the Texas Public Information Act. If the fees will result in a charge exceeding \$40.00, the district will provide the requestor with a written estimate detailing the charges that will be imposed. The following fees apply to Open Records requests:

- \$15.00 per hour labor charge for locating, compiling, reproducing, reviewing and redacting information (>50 pages)
- \$28.50 per hour labor charge for computer programming when needed
- 20% overhead fee added to labor charges
- 10 cents per page for letter-sized paper copies
- 15 cents per page for legal-sized paper copies
- \$1.00 per CD
- \$3.00 per DVD
- Postage

Payment methods accepted: checks or credit cards. **NO cash payments accepted.**

Timelines and Deadlines

As provided by the Texas Public Information Act, Plano ISD will provide the requested information promptly. Depending upon the complexity of the request and volume of other pending requests, this is typically 10 business days. If we are unable to complete your request within 10 business days, we will notify you of the date we expect to complete your request. If your request includes information that we believe is confidential or excepted from release, we will submit a request for an opinion to the Texas Attorney General to determine whether the requested information may be released or must be withheld.

or records you are seeking. Include the following, if applicable:

- Date range of the records requested
- Department or person you believe may possess the records
- Location involved

In responding to requests, the district is not required to:

- Prepare or Create New Information
- Prepare Answers to Questions
- Perform General or Legal Research

**EXHIBIT B: October 8, 2025, written public information request
from Plaintiff to PISD - Full request email.**



Public Information Request

From Shannon Ayres <sayres@ccdfusa.com>

Date Wed 10/8/2025 5:38 PM

To Open Records <openrecords@pisd.edu>

To Whom It May Concern:

Pursuant to the Texas Public Information Act (Texas Government Code, Chapter 552), I am requesting access to and copies of all records held by Plano Independent School District (Plano ISD) at Murphy Middle School from May 1, 2025, to the present date, related to the following:

All reports, complaints, or notifications regarding mold presence, growth, or exposure in any Plano ISD facilities, including schools, administrative buildings, or other district properties.

All maintenance tickets, work orders, logs, or service requests pertaining to mold inspections, testing, remediation, or related repairs, including efforts by individual teachers in their classrooms.

All records documenting mold mitigation efforts, including inspection results, testing data, remediation plans, contractor agreements, invoices, progress reports, and completion certifications.

All workers' compensation claims, filings, reports, or related documentation submitted by employees alleging health issues related to mold exposure or indoor air quality issues.

All communications related to the above, including emails, memos, text messages, internal notes, meeting minutes, and any other written or electronic documents involving district staff, administrators, contractors, vendors, health officials, insurance providers, or other parties.

This request encompasses records in any format, including paper, electronic, digital, or other media, and includes any attachments, drafts, or deleted items that may be recoverable.

Fee Waiver Request: I request a waiver of all fees associated with this request, as disclosure of these records is in the public interest, pursuant to Section 552.267 of the Texas Government Code. The information sought concerns potential health and safety hazards in public schools, which significantly affects the community, students, and employees of Plano ISD, and will contribute to public understanding of district operations and safety measures.

Redaction of Private Information: I consent to the redaction of personal private information (e.g., Social Security numbers, medical details protected under HIPAA, or other personally identifiable information exempt under Section 552.101 or 552.147) to facilitate prompt release. For any other proposed redactions or withholdings, I request that you seek a determination from the Texas Attorney General's Open Records Division, as required by Section 552.301, including

a detailed explanation of the statutory exemption claimed and identification of the withheld records with sufficient particularity to allow for appeal.

I request that the records be provided in electronic format (e.g., PDF or searchable digital files) via email or secure download link, if possible, to minimize costs and expedite delivery. If fees are anticipated to exceed \$40, please provide a written itemized estimate before proceeding, as required by Section 552.2615. I am willing to narrow the request if necessary to reduce costs.

Please respond within 10 business days, as mandated by Section 552.221. If clarification is needed, contact me promptly at the information provided below.

Thank you for your attention to this matter. I look forward to your prompt response.

SHANNON AYRES

Texas Education Director

██████████ | sayres@ccdfusa.com



**EXHIBIT C: October 8, 2025, written public information request
from Plaintiff to PISD - Delivery and read receipts confirming
receipt at 6:38 p.m. on October 8.**

Public Information Request

 Copy report text  Prepare and email extended report

 View message in Explorer  Go Hunt for this message 

Sender

sayres@ccdfusa.com

Recipient

openrecords@pisd.edu

Received

Processed

Sent

Status

Office 365 successfully sent the message to the following external address:

External address: openrecords@pisd.edu

More Information

If the recipient can't find the message in their Inbox folder, one of several things could have happened:

- The message may have been deleted or moved to another folder (for example, the Junk Email folder).
- The recipient might have created a forwarding rule that forwarded the message to a different email address.
- There might be something wrong with the recipient's email system.

[Report Message](#)

Public Information Request

 Copy report text  Prepare and email extended report

 View message in Explorer  Go Hunt for this message 

Message events



 Date (UTC-05:00)	Event	Detail
 10/8/2025, 6:38 PM	Receive	Message received by: DM6PR02MB6...
Message received by: DM6PR02MB6747.namprd02.prod.outlook.com		
 10/8/2025, 6:38 PM	Submit	The message was submitted.
The message was submitted.		
 10/8/2025, 6:38 PM	TRANS...	
 10/8/2025, 6:38 PM	Send e...	Message sent to pisd-edu.mail.prote...
Message sent to pisd-edu.mail.protection.outlook.com at 2a01:111:f403:c903::		

Report Message

EXHIBIT D: November 13, 2025, Plaintiff filed a formal complaint with the Texas Attorney General's Open Records Division alleging PISD's violation of the Act – Complaint and filing confirmation.

COMPLAINT TO TEXAS ATTORNEY GENERAL OPEN RECORDS DIVISION

TO: Office of the Attorney General
Open Records Division
P.O. Box 12548
Austin, Texas 78711-2548
Submitted Via Texas Attorney General Online Portal

FROM: Shannon Ayres
Texas Education Director
Citizens Defending Freedom USA
[REDACTED]
sayres@ccdfusa.com

RE: Complaint of Violation of the Texas Public Information Act (Texas Government Code, Chapter 552) by Plano Independent School District

I. NATURE OF COMPLAINT

I am writing to file a formal complaint against the Plano Independent School District (PISD) for failing to comply with the Texas Public Information Act (TPIA), Texas Government Code § 552.001 et seq. As a requestor, I submitted a written request for public information on October 8, 2025, and to date, PISD has not provided any response, requested an extension of time, or sought an opinion from your office regarding any claimed exceptions. This complete disregard for the statutory requirements constitutes a violation of the Act.

II. DESCRIPTION OF PUBLIC INFORMATION REQUEST

On October 8, 2025, I sent a Public Information Request via email to openrecords@pisd.edu, with the subject "Public Information Request" in accordance with prior practice and per the instructions given on the PISD public information website. **See Exhibit A** The request sought access to and copies of all records held by Plano Independent School District at Murphy Middle School from May 1, 2025, to the present date, related to the following:

1. All reports, complaints, or notifications regarding mold presence, growth, or exposure in any Plano ISD facilities, including schools, administrative buildings, or other district properties.

2. All maintenance tickets, work orders, logs, or service requests pertaining to mold inspections, testing, remediation, or related repairs, including efforts by individual teachers in their classrooms.
3. All records documenting mold mitigation efforts, including inspection results, testing data, remediation plans, contractor agreements, invoices, progress reports, and completion certifications.
4. All workers' compensation claims, filings, reports, or related documentation submitted by employees alleging health issues related to mold exposure or indoor air quality issues.
5. All communications related to the above, including emails, memos, text messages, internal notes, meeting minutes, and any other written or electronic documents involving district staff, administrators, contractors, vendors, health officials, insurance providers, or other parties.

The request encompassed records in any format, including paper, electronic, digital, or other media, and included any attachments, drafts, or deleted items that may be recoverable. I waived all fees associated with this request pursuant to Texas Government Code § 552.267, as the information sought concerns potential health and safety hazards in public schools, which significantly affects the community, students, and employees of Plano ISD, and will contribute to public understanding of district operations and safety measures.

Additionally, I consented to the redaction of certain private information protected under HIPAA or other personally identifiable information exempt under Texas Government Code §§ 552.101 or 552.147 and requested that any such redactions be accompanied by a determination from your office as required by § 552.301. A copy of the original request email is attached to this complaint for your reference **See Exhibit B**

III. VIOLATION OF THE ACT

Under Texas Government Code § 552.221, a governmental body must promptly produce public information for inspection or duplication, or provide a written statement within 10 business days if it cannot comply immediately. If additional time is needed, the body may request an extension under § 552.225. If the body believes information is excepted from disclosure, it must request a decision from the Attorney General within 10 business days under § 552.301.

My request was submitted on October 8, 2025, a Wednesday. The 10-business-day period expired on or about October 22, 2025. As of today, November 13, 2025, I have received no acknowledgment, no documents, no cost estimate, no request for clarification, no extension notice, and no indication that PISD has sought an opinion from your office. This failure to respond in any manner violates the TPIA and deprives the public of access to information critical to health and safety in our schools.

Requested Relief:

I respectfully request that the Office of the Attorney General investigate this matter promptly and take appropriate enforcement action, including but not limited to: **(1) Compelling PISD to respond to my request and release the requested information without further delay; (2) Imposing any applicable penalties or remedies for non-compliance under Texas Government Code § 552.3215 or other relevant provisions.**

I am available to provide any additional information or clarification needed for your investigation. Please contact me at the email or phone number provided above. Thank you for your attention to this important matter and for upholding the principles of open government in Texas.

Respectfully submitted,

//s//

Shannon Ayres
Texas Education Director
Citizens Defending Freedom USA

Open Records

The Open Records Section processes requests for public records made pursuant to the Texas Public Information Act. Plano ISD is a governmental entity separate from the City of Plano.

Need Student Records?

Parent, guardians, students or their representatives must request student records from the campus where the student last attended school.

General Information/Questions?

Requests for general information or general questions not involving requests for records: [Let's Talk! \(/fs/pages/14091\)](/fs/pages/14091)

Submitting Open Records Requests

As provided by the Texas Public Information Act, all open records requests submitted to Plano ISD must be in writing, and submitted in one of the following ways:

1. Electronically submitted through the **Plano ISD Open Records Center** (this is the most efficient way to request and receive records)
2. By mailing your written request via United States mail, addressed to: Plano ISD Open Records Section – Attention Robyn White, 2700 W. 15th Street, Plano, Texas 75075
3. By email to: openrecords@pisd.edu (<mailto:openrecords@pisd.edu>)
4. By submitting your written request in person to the Plano ISD Open Records Section, First Floor, Plano ISD Administration

[Skip To Main Content](#)

Open Records Center

Request open records electronically here

Plano ISD Open Records Center

[https://planotxisd.mycustomerhelpline.com/SessionID=\)](https://planotxisd.mycustomerhelpline.com/SessionID=)

Student Transcripts & Records Requests

Students Transcripts and Records Requests
(</fs/pages/16741>)

[Business Calendar](/fs/pages/16686)
(</fs/pages/16686>)

Important: Be Specific

We may ask for clarification of your request if it is not clear what information

Building, 2700 W. 15th Street, Plano, Texas 75075

Charges & Fees

Plano ISD charges fees authorized by the Texas Public Information Act. If the fees will result in a charge exceeding \$40.00, the district will provide the requestor with a written estimate detailing the charges that will be imposed. The following fees apply to Open Records requests:

- \$15.00 per hour labor charge for locating, compiling, reproducing, reviewing and redacting information (>50 pages)
- \$28.50 per hour labor charge for computer programming when needed
- 20% overhead fee added to labor charges
- 10 cents per page for letter-sized paper copies
- 15 cents per page for legal-sized paper copies
- \$1.00 per CD
- \$3.00 per DVD
- Postage

Payment methods accepted: checks or credit cards. **NO cash payments accepted.**

Timelines and Deadlines

As provided by the Texas Public Information Act, Plano ISD will provide the requested information promptly. Depending upon the complexity of the request and volume of other pending requests, this is typically 10 business days. If we are unable to complete your request within 10 business days, we will notify you of the date we expect to complete your request. If your request includes information that we believe is confidential or excepted from release, we will submit a request for an opinion to the Texas Attorney General to determine whether the requested information may be released or must be withheld.

or records you are seeking. Include the following, if applicable:

- Date range of the records requested
- Department or person you believe may possess the records
- Location involved

In responding to requests, the district is not required to:

- Prepare or Create New Information
- Prepare Answers to Questions
- Perform General or Legal Research



Public Information Request

From Shannon Ayres <sayres@ccdfusa.com>

Date Wed 10/8/2025 5:38 PM

To Open Records <openrecords@pisd.edu>

To Whom It May Concern:

Pursuant to the Texas Public Information Act (Texas Government Code, Chapter 552), I am requesting access to and copies of all records held by Plano Independent School District (Plano ISD) at Murphy Middle School from May 1, 2025, to the present date, related to the following:

All reports, complaints, or notifications regarding mold presence, growth, or exposure in any Plano ISD facilities, including schools, administrative buildings, or other district properties.

All maintenance tickets, work orders, logs, or service requests pertaining to mold inspections, testing, remediation, or related repairs, including efforts by individual teachers in their classrooms.

All records documenting mold mitigation efforts, including inspection results, testing data, remediation plans, contractor agreements, invoices, progress reports, and completion certifications.

All workers' compensation claims, filings, reports, or related documentation submitted by employees alleging health issues related to mold exposure or indoor air quality issues.

All communications related to the above, including emails, memos, text messages, internal notes, meeting minutes, and any other written or electronic documents involving district staff, administrators, contractors, vendors, health officials, insurance providers, or other parties.

This request encompasses records in any format, including paper, electronic, digital, or other media, and includes any attachments, drafts, or deleted items that may be recoverable.

Fee Waiver Request: I request a waiver of all fees associated with this request, as disclosure of these records is in the public interest, pursuant to Section 552.267 of the Texas Government Code. The information sought concerns potential health and safety hazards in public schools, which significantly affects the community, students, and employees of Plano ISD, and will contribute to public understanding of district operations and safety measures.

Redaction of Private Information: I consent to the redaction of personal private information (e.g., Social Security numbers, medical details protected under HIPAA, or other personally identifiable information exempt under Section 552.101 or 552.147) to facilitate prompt release. For any other proposed redactions or withholdings, I request that you seek a determination from the Texas Attorney General's Open Records Division, as required by Section 552.301, including

a detailed explanation of the statutory exemption claimed and identification of the withheld records with sufficient particularity to allow for appeal.

I request that the records be provided in electronic format (e.g., PDF or searchable digital files) via email or secure download link, if possible, to minimize costs and expedite delivery. If fees are anticipated to exceed \$40, please provide a written itemized estimate before proceeding, as required by Section 552.2615. I am willing to narrow the request if necessary to reduce costs.

Please respond within 10 business days, as mandated by Section 552.221. If clarification is needed, contact me promptly at the information provided below.

Thank you for your attention to this matter. I look forward to your prompt response.

SHANNON AYRES

Texas Education Director

██████████ | sayres@ccdfusa.com



EXHIBIT E: The urgency of disclosure is underscored by the following publicly reported events in September and October 2025 related to potential mold hazards at PISD facilities that could affect the well-being of students, staff, and the community. Full articles or screenshots attached collectively.

Mom Still Concerned After Plano ISD Addresses ‘Moldy’ Murphy Middle School

District officials report “no health concerns,” but parents and teachers aren’t satisfied that the school’s air quality is safe.



By Erin Anderson | September 26, 2025

3 min read

Officials in Plano Independent School District finally addressed the issue of mold in Murphy Middle School after students, parents, and teachers complained.

But for some, the issue is not resolved.

Principal Tramy Tran **emailed** Murphy families on Tuesday to “address recent concerns” regarding air quality and “potential black mold” in the building.

Tran confirmed that the district had hired a third party to conduct a “limited” mold inspection, which concluded that air



quality inside the school was “well within acceptable range and presents no health concerns.”

At least one Murphy student’s mom is still concerned, as are several staff members.

Since the start of the school year, Meghan Vecchio’s son has been suffering headaches. She began to suspect they might be related to poor air quality caused by mold or mildew after he complained of bad smells in several classrooms.

Those suspicions were bolstered when Vecchio learned that several Murphy teachers were out sick, possibly due to mold-related illnesses, and that the district had conducted mold testing and attempted to clean away the smells.

When she began asking questions and requested a visit to see her son’s school for herself, she was put off, then had a scheduled appointment postponed until Monday, September 22.

According to Vecchio, Deputy Superintendent Johnny Hill called her ahead of the meeting. Hill told her that teachers had reported the mold, and he assured her the district had “fixed” it. Plano ISD’s Chief of Business Services Steve Ewing was also on the call.

Vecchio and her husband were allowed to tour the school on the 22nd, but only under strict conditions. ^

That morning, Hill emailed Vecchio laying out “expectations” for the tour, adding that it was “a courtesy by Plano ISD” and

not required by law.

Hill stated that he, Chief of Safety and Security Kevin Keating, and Murphy Middle School SRO Officer Connor LeBaron would accompany the two parents on the tour of specified classrooms.

He also said no pictures or videos would be allowed, cautioning, “Failure to follow this request will result in the immediate termination of the tour.”

Vecchio called the 20-minute tour inconclusive, saying she saw signs of recent cleanup, including new carpet in classrooms where the district had first attempted to shampoo out the smells while her campus visit was delayed.

The next day, Principal Tran released her statement to Murphy families.

Tran said mold became an issue over the summer “due to humidity in the building that created a musty smell.” Plano ISD then completed a “deep clean of relevant areas” and conducted a mold inspection.

“As an added precaution, the district contracted with another independent service provider to complete a deep cleaning and preventative measures in the reported areas,” Tran stated.

Vecchio obtained a copy of the September 4 **Limited Environment Mold Assessment Report** provided by ERC Environmental and Construction Services.



While the principal's message highlighted the absence of "black mold," ERC detected varying levels of other molds throughout Murphy Middle School and recommended several remediation measures.

The report cited visible mold and mildew and "noticeable humidity" but concluded that airborne mold spore levels were "acceptable."

However, a third-party professional review of ERC's mold assessment concluded that additional testing is warranted.

"It is my professional opinion that a re-inspection with an expanded scope is required to protect occupant health, comply with best-practice guidance, and restore confidence in the campus environment," wrote Wendy Michaelis of FixAIRx in a **September 11 report**.

Vecchio also **contacted** David Alkins, a **code compliance officer** for the city of Murphy, where the school is located.

Alkins **responded** Friday morning that he was aware of the concerns. Alkins said he had visited the school, met with the principal to discuss the issues, and requested additional records from the district.

"We will continue to investigate this matter once we receive more information from the open records request," wrote Alkins.



Parents with students attending Murphy Middle School may contact campus or district administrators with questions or concerns.

[Support Texas Scorecard!](#)



Erin Anderson

Erin Anderson is a Senior Journalist for Texas Scorecard, reporting on state and local issues, events, and government actions that impact people in communities throughout Texas and the DFW Metroplex. A native Texan, Erin grew up in the Houston area and now lives in Collin County.



Plano ISD temporarily closes middle school for environmental remediation

By Amber Kite | Published October 5, 2025 7:25am CDT | Plano | FOX 4 |

The Brief

- Murphy Middle School will close for one week (Oct. 6-10) for environmental cleanup, including HVAC cleaning and carpet replacement.
- The closure is "out of an abundance of caution" following air quality assessments that found issues with high humidity.
- The district confirmed that neither study detected black mold; an alternate learning plan for students begins Oct. 7.

PLANO, Texas - The Murphy Middle School campus in Plano ISD will close for week starting Oct. 6 for environmental cleanup following two independent air quality assessments, the district announced.

Murphy Middle School Closure

What we know: The temporary closure, which runs through Oct. 10, was made "out of an abundance of caution" after air quality studies initiated due to community concerns revealed areas impacted by elevated humidity and changing environmental conditions.

The district stressed that neither air quality study detected black mold on the campus. Initial cleaning efforts addressed early findings, but subsequent testing indicated more significant work was needed.

GIFT GUIDE



Need gift ideas? Check out the 2025 FOX Holiday Gift Guide

FOX 4 Consumer reporter Steve Noviello gets more than 1,000 product pitches each year. He shares the greatest gifts of the season in his 2025 FOX Holiday Gift Guide.



- Carpet replacement in some areas.
- Cleaning of the HVAC system.
- Surface disinfecting.
- Installation of dehumidifiers and air purifiers.
- Window resealing.

What's next: An alternate learning plan for students will begin Oct. 7, and all extracurricular activities are postponed during the closure. The district stated that scheduling the work ahead of the upcoming fall break will allow for "thorough mitigation with minimal disruption."

Plano ISD said it remains committed to the health and safety of students and s and will provide updates as the remediation progresses.

The Source: Information in this article is from Plano ISD.

Plano Education

GIFT GUIDE



Need gift ideas? Check out the 2025 FOX Holiday Gift Guide

FOX 4 Consumer reporter Steve Noviello gets more than 1,000 product pitches each year. He shares the greatest gifts of the season in his 2025 FOX Holiday Gift Guide.



MORE FROM HOMEPAGE

Five thoughts from 2026 World Cup draw: Heavy hitters, Messi poised for AT&T Stadium

Kerr County callers ple
begged for help in 911 >

ADVERTISEMENT

[NEWS](#) | [PUBLIC HEALTH](#)

Mold, air quality concerns abruptly close Plano middle school for cleaning

Air vents, carpets and classrooms will get a cleaning before Murphy Middle School can reopen.



By **Lilly Kersh**
Staff Writer

Oct. 6, 2025 | Updated 3:30 p.m. CDT | ⌚ 2 min. read





SHELTON SCHOOL
Since 1976, leading the way for students who learn differently.

Rolling Admission
Early Childhood — Grade 12
The premier school for intelligent children
who have a learning difference.

Plano ISD Temporarily Closes Middle School Building Amid Environmental Concerns

Matilda Preisendorf
Oct 6, 2025 12:00 PM



| Photo: Plano ISD

[Listen to this article](#)

00:02:18

Plano ISD announced that Murphy Middle School will be closed Oct. 6–10 while crews carry out environmental remediation work. The decision comes after two independent air quality assessments were conducted in response to concerns raised by parents and staff.

While the initial round of cleaning addressed some early issues, further testing revealed additional areas affected by elevated humidity and shifting conditions inside the building. Importantly, neither study found evidence of black mold. Still, district leaders say they are moving forward out of an abundance of caution.

What Remediation Involves

The upcoming work will focus on making the building safer and healthier for students and staff. Contractors will replace carpet in specific areas, clean and service the HVAC system, disinfect

surfaces and install both dehumidifiers and air purifiers. Crews will also reseal windows to prevent moisture from seeping into the building.

HOLIDAY GIFT GUIDE



DMA

By scheduling the project just before the district's fall break, Plano ISD aims to minimize classroom disruption while still addressing the problem quickly.

Learning Plan During Closure

To keep instruction on track, an alternate learning plan will begin Oct. 7. Details have been shared with families to ensure students can continue coursework during the temporary closure. All extracurricular activities are also postponed until the building reopens.



Plano ISD leaders [emphasized](#) that while the interruption may be inconvenient, protecting student and staff well-being is the top priority.

Looking Ahead

The district pledged to provide regular updates as remediation progresses. Once the work is completed, officials say Murphy Middle School will reopen with improved air quality and stronger safeguards against moisture-related issues.

For Plano ISD, the closure is a reminder of the ongoing responsibility schools face in maintaining safe, healthy environments for learning. The proactive approach, officials say, reflects the district's broader commitment to the community it serves.

Don't miss anything *Local*. [Sign up](#) for our free newsletter.

Comments (0)

NEWS

FOOD + DRINK

COMMUNITY

THINGS TO DO

MAGAZINE

LOCAL BUSINESSES

MORE

[Arts + Culture](#)

[Business](#)

[Health](#)

[Family](#)

[Lifestyle](#)

[Legal](#)

[Local Deals](#)

[Local Traveler](#)

[Real Estate](#)

[Women In Business](#)

[Contact Us](#)

ABOUT

2121 W Spring Creek Pkwy

Suite #100

Plano, TX 75023

(972) 769-7272

connect@localprofile.com

© 2025 Local Profile is a registered trademark of Community Profile LLC. All Rights Reserved.

Plano ISD Closes Moldy Murphy Middle School for More Mitigation

The school's principal announced a week-long closure starting Monday in an email sent Friday night at 11:10 p.m.



By Erin Anderson | October 6, 2025

2 min read

Plano Independent School District is closing Murphy Middle School for more mold mitigation less than two weeks after telling families that the school posed “no health concerns” related to mold.

In an [email](#) sent Friday night at 11:10 p.m., Principal Tramy Tran told Murphy families that the school building would be closed from Monday, October 6, through Friday, October 10, while the district conducts “enhanced mitigation efforts in response to the ongoing environmental concern previously communicated.”

Tran's previous communication, sent September 23, marked the first time **district administrators publicly addressed mold concerns** raised by Murphy families and staff since the school opened for the year in mid-August.

Throughout August and September, students complained of bad smells in classrooms, and several teachers were out sick due to possible mold-related illnesses.

Tran acknowledged that air quality and potential black mold became concerns over the summer due to "humidity in the building that produced a musty smell." However, parents and staff were not made aware of the potential health hazards at that time.

An August 11 back-to-school social media **post** showed Murphy teachers and staff on campus and stated "Classrooms ready."

Deputy Superintendent Johnny Hill told a concerned Murphy mom in September that teachers had reported the mold but assured her the district had "fixed" it.

Tran's public acknowledgement on September 23 stated that a "limited" mold inspection had concluded the air quality inside the school was "well within acceptable range and presents no health concerns."

Parents and teachers remained skeptical. They questioned whether the inspection described in a September 4 "**Limited Environment Mold Assessment Report**" provided to the district

by ERC Environmental and Construction Services adequately assessed the issues.

A third-party professional review of ERC's mold assessment dated September 11 concluded that additional testing was warranted.

Ten days after telling families their concerns had been addressed, Tran stated Friday that a second inspection had "identified additional areas requiring remediation."

The "additional mitigation" will include replacing carpet, cleaning HVAC ductwork, resealing windows, thoroughly cleaning and disinfecting surfaces, and adding [de]humidifiers and air purifiers throughout the building.

Parents spotted a fleet of service trucks outside the school over the weekend, including for HVAC company LSI and BMS CAT water and mold remediation.

"A lot of trucks up there if nothing is truly wrong," posted a parent on social media.

Tran said that after remediation, additional air quality tests will be performed before students and staff return to campus, and further updates will be provided.

All Plano ISD schools will be closed October 13-15 for Fall Break. October 16-17 are also student holidays, while staff are scheduled to work.

Tran added that “learning opportunities” will resume on Tuesday, October 7, through an “alternate learning plan” to be shared with parents on Monday. Some parents are considering alternatives to returning their students to Murphy.

Plano ISD school board trustees are meeting on October 7, but parents won’t be able to raise concerns about mold at Murphy, as it’s not on the agenda.

In August, trustees voted 5-2 to limit public comments at board meetings to agenda items only.

Concerned families can contact trustees or district administrators directly.

No ads. No paywalls. No government grants. No corporate masters.

Just real news for real Texans.

[Support Texas Scorecard to keep it that way!](#)

Erin Anderson

Erin Anderson is a Senior Journalist for Texas Scorecard, reporting on state and local issues, events, and government actions that impact people in communities throughout Texas and the DFW Metroplex. A native Texan, Erin grew up in the Houston area and now lives in Collin County.

Murphy Middle School principal says campus to reopen for students after environmental remediation

Murphy Middle School closed this week after air quality assessments led to environmental remediation. WFAA sat down with the principal.



Author: Tiffany Liou
Published: 7:10 PM CDT October 9, 2025
Updated: 7:10 PM CDT October 9, 2025



PLANO, Texas — Murphy Middle School is closed this week as Plano ISD addresses environmental issues inside the building.

The district said the closure comes after staff raised concerns about humidity and odors in certain areas of the campus. Dr. Mark Letterer, a principal supervisor at Plano ISD, said an initial environmental study in late August led to recommendations that were completed.

“Upon receiving some more concerns, we did a more thorough environmental study,” Letterer said.

When results from that second study came back on Oct. 3, the district made the decision to close the building and resolve the recommendations from the assessment the following week.

"The building was always in good shape for the students, but we really are taking extra precaution to complete the recommendations," Principal Dr. Tramy Tran said.

The study did not detect black mold, according to Letterer, but there were references to mildew. He said the assessment recommended cleaning ducts and HVAC systems, disinfecting supply and return grills, and replacing carpet in some classrooms.

Tran said at least seven classroom carpets have already been replaced, and re-testing will be conducted before staff and students return.

"As soon as I hear a concern, the district has been very responsive," Tran said.

Students are studying online this week. With Fall Break scheduled next week, Tran plans to resume in-person instruction Oct. 20 at Murphy Middle School. She said they are filing a waiver with the Texas Education Agency and does not believe makeup days will be needed.

For students who need breakfast or lunch, food is being provided at McMillan High School across the street from Murphy Middle School. In-person academic support is also being offered at the McMillan library.

"We were proactive. We want to do the right thing," Letterer said.

Tran said she looks forward to welcoming students back once remediation is complete.



Get Full Government Meeting Transcripts, Videos, & Alerts Forever! >



About Us

Local Government

Bills

News

Federal Library

Search Options

Log in

Support Our Mission

Plano ISD updates bond work; Murphy Middle closed briefly for HVAC remediation, district says issue addressed

October 21, 2025 | [PLANO ISD](#), [School Districts](#), [Texas](#)



Subscribe

This article was created by AI summarizing key points discussed. AI makes mistakes, so for full details and context, please refer to the [video of the full meeting](#). Please report any errors so we can fix them. [Report an error](#) »

Murphy MS HVAC

IAQ Test Conducted - March 27, 2024

- 2 locations tested throughout building (Rm J101 & Rm K105)
 - None had black mold spores (Stachybotrys)
 - None had high levels of common mold (Aspergillus/Pseudocercospora/Cladosporium)
 - No humidity concerns- within normal range
 - Carbon Dioxide (CO2) levels were higher than acceptable range of ASHRAE (1,311-1,390 ppm), but far below the current OSHA threshold of 5,000 ppm
 - Results of the surface sample analysis indicated trace concentration levels of common mold spore on
- All recommendations were remediated

Based on current state standards and test results, it is ERC's opinion that the quality of indoor air for

Don't Miss a Word: See the Full Meeting!

Project # P-24014.06.03D is within acceptable levels for the parameters tested.



★ **Plus:** Ask questions about this article.

Plano ISD trustees heard a detailed bond-program update and an account of an indoor-air-quality response at Murphy Middle School during the board's Oct. 21 meeting.

Superintendent Dr. Therese Williams said district staff first received concerning indoor-air test results for Murphy on Oct. 3 and immediately began remediation work. The district moved learning online during the remediation window and used fall-break and targeted weekend work to reduce disruption, Williams said. She told the board the environmental firm certified the campus as cleared on Oct. 14, staff returned later that week and students returned on the following Monday.

Tony Pearson, director of new construction, gave the board a multi-campus bond progress report that covered completed work (32 projects finished since June) and projects in design or construction at senior highs and middle schools. He described ongoing work at multiple campuses including Pearson, Centennial, Vines, Clark and Haggard and said the athletic addition and storm-shelter work at Plano Senior High is expected to continue into 2026.

Williams described the Murphy timeline in detail: initial spot testing in March 2024 found only common, low-level mold traces and normal results; a larger round of testing in early October found higher indoor-than-outdoor mold spore counts

Go beyond summaries. **Unlock every video, transcript, and key insight with a Founder Membership.**

✓ Get instant access to full meeting videos

✓ Search and clip any phrase from complete transcripts

✓ Receive AI-powered summaries & custom alerts

✓ Enjoy lifetime, unrestricted access to government data

Access Full Meeting

30-day money-back guarantee

in about a dozen classrooms from a roughly 63-location diagnostic survey. As a precaution and to limit disruption, the district paused on-campus learning, contracted remediation according to an industry protocol, deep-cleaned HVAC equipment and mechanical components, and conducted follow-up tests before re-opening. She said the district began remediation within hours of learning the full results and that the remediation included cleaning HVAC coils, addressing control components and treating affected interior surfaces.

Pearson and Williams told the board they are reviewing preventive-maintenance schedules and staffing deployments. Williams said facilities leadership plans to redesign some work-order review processes, increase professional development for trades staff, and seek vendor partnerships to augment in-house capacity. Jason Wink (facility insight lead), Blake Vaughn (interim executive director of facilities) and Manuel Rodriguez (IPM coordinator) were identified as the staff leading remediation and follow-up work.

Pearson also said district leadership is accelerating some projects and consolidating scopes where possible so major HVAC work is combined with other campus improvements to reduce repeated disruptions. He noted the transportation fueling-station schedule must be settled before issuing the transportation-building renovation for bid.

Board members asked for more regular maintenance metrics and a separate quarterly report on maintenance, work-order backlogs and the Facility Insight asset catalog the district is building. Williams said that effort is underway and staff expect a fuller update by November or December and broader delivery by 2027.



The board was told the district currently has multiple trade-area vacancies — Williams said about 19 openings in trade positions — and staff are exploring recruitment, apprenticeship and partnership options to improve capacity.

The presentation included drone and site photos of active bond projects and a timeline of upcoming contractor recommendations for kitchens, playgrounds and tracks. No board vote was required on the remediation itself; staff described actions taken as operational responses and described planned administrative adjustments to maintenance protocols.

Sponsors

Proudly supported by sponsors who keep Texas articles free in 2025



Scribe from Workplace AI



Citizen Portal
Inc. All rights
reserved.

Find Your State

AL AK AR AZ CA CO
CT DE DC FL GA GU
HI IA ID IL IN KS KY
LA MA MD ME MI
MN MO MS MT NE
NH NJ NM NV NY
NC ND OH OK OR
PA PR RI SC SD TN
TX UT VA VT WA
WI WV WY
GU AS VI

Get Involved

[Vote for new features
and content](#)

[Become a Sponsor](#)

[Become a Citizen
Volunteer](#)

[Learn More](#)

[Contact Us](#)



Plus : Ask about this article

support@CitizenPortal.ai [Privacy Policy](#) [Terms of Service](#) [Answers](#) [Today](#)

Help