

## **SECTION XII – NEXT STEPS, INFORMATION GAPS, & REQUIRED EVIDENCE**

This section identifies actionable next steps for investigators, attorneys, forensic analysts, and federal/state oversight agencies. It also lists the specific open-source, statutory, environmental, cultural-resource, and financial documentation needed to close the remaining evidentiary gaps. The goal is to convert the INTSUM from probable cause → prosecutorial-grade case file.

### **XII.1 NEXT STEPS – STRATEGIC ACTION ITEMS**

These are the actions required to advance the investigation into a fully litigable corruption, RICO, environmental-crimes, and public-trust case.

#### **XII.1.1 Immediate Legal-Process Actions**

1. Prepare Formal Texas Ranger Criminal-Referral Packet
  1. Attach: this INTSUM, Section IX (Federal Kill-Shot Authorities), Section X (State Kill-Shot Authorities), Section V (Indicators & Red Flags), and the Money Flow & Corruption Pipeline Diagram.
  2. Include request for a case number, assigned investigator, and sworn receipt of materials.
2. Prepare Federal Referral Copies (Parallel Tracks)
  1. DOJ Public Integrity Section (public corruption, honest-services fraud, RICO).
  2. DOJ Environment & Natural Resources Division (ENRD) – environmental crimes, CERCLA/RCRA, CWA/NEPA.
  3. EPA Criminal Investigations Division – contamination, SDWA, CCR, non-enforcement.
  4. USACE Fort Worth District Regulatory Chief – CWA §404/§408, NEPA, NHPA/NAGPRA triggers.
  5. DOI / National Park Service – NHPA §106, NAGPRA, ARPA, Tribal trust responsibilities.
3. Issue Litigation-Grade Preservation Letters (Federal Rule 37 + Texas Spoliation Rules)

Directed to:

  1. TWDB (Board members, executive staff, Region C liaison).
  2. TCEQ (commissioners, water permitting, enforcement, CCR/coal-ash teams).
  3. RRC (pipeline/common carrier staff, corridor routing teams, mining legacy units).
  4. Texas Department of Agriculture (TDA) – Commissioner Sid Miller and senior staff involved in land-use, rural development, and water-scarcity messaging.
  5. Region C Water Planning Group (WPG) – chair, voting members, technical consultants.
  6. Hopkins, Franklin, Titus, Red River, Delta, and Morris County EDCs and appraisal districts.
  7. Freese & Nichols and subcontractors (AECOM, HDR, Halff, Jacobs).
  8. MSB Global / SSDC1 (Matrix AI campus entities) and their site-selection consultants.
  9. Timber trusts and corridor-adjacent speculative LLCs (Hillwood/Perot, Hunt, Bass/CEM, Tatum/Temple-Inland, WestRock, Georgia-Pacific, Brookfield, Blackstone, and related Delaware LLCs).
4. Demand Conflict-of-Interest Filings Under Tex. Gov't Code § 572.058
  1. TWDB: Paup, Jackson, Walker, and any staff with prior or current FNI/consultant ties.
  2. TCEQ: commissioners and senior management overseeing CCR, permitting, and enforcement.
  3. RRC: commissioners and senior staff dealing with pipeline/common-carrier status and reservoir-adjacent routing.

4. Region C WPG voting members and alternates whose employers benefit from reservoir projects or AI-driven water demand.
5. Texas Department of Agriculture: Commissioner Sid Miller and staff involved in rural land-valuation policies, "water scarcity" messaging, and corridor-aligned rural infrastructure initiatives.
5. Begin a Formal "Administrative Exhaustion Log"
  1. Record all agency failures, omissions, refusals to investigate, non-responses, and irregular approvals.
  2. This log will be the backbone for **federal preemption**, civil-rights claims, and administrative-law challenges.

### **XII.1.2 Field, Environmental & Archaeological Actions**

1. Commission a Third-Party Hydrological & Contamination Risk Assessment
  1. Sulphur River basin (upstream/downstream hydrology).
  2. White Oak Creek contamination plume and coal-ash CCR units.
  3. AI megahub groundwater interactions and capture zones.
  4. Integration with RCRA/CERCLA "imminent hazard" and PRP exposure.
2. Commission a Tribal-Led Cultural-Resource Survey (Independent of Texas Agencies)
  1. Caddo Nation (primary cultural authority).
  2. Wichita & Affiliated Tribes; Alabama-Coushatta, and other historically connected Nations.
  3. Independent archaeologists with no consulting relationship to FNI, TWDB, TCEQ, RRC, or Texas agencies.
3. Request USGS and EPA Independent Sampling & Technical Assistance
  1. Arsenic, boron, chromium, molybdenum, and other CCR signatures.
  2. Basin inflows, groundwater directionality, and reservoir-footprint impacts.
  3. Cross-reference with §404(b)(1) LEDPA analysis and NEPA cumulative-impact obligations.

### **XII.1.3 Financial, Influence & Policy-Mapping Actions**

1. Acquire and Analyze Campaign-Finance Disclosures
 

Focus on:

  1. Energy Transfer, Kinder Morgan, Enbridge, Williams, Atmos, Enterprise Products, MPLX, DCP Midstream PACs.
  2. TXOGA and sector-linked PACs (pipeline, "infrastructure," gas storage).
  3. Hillwood/Perot entities, Hunt family networks, Bass/CEM, timber and land-holding trusts.
  4. Donors and PACs linked specifically to TDA and Commissioner Sid Miller, including rural-development and agricultural PACs that align with AI, transmission, and pipeline corridors.
2. Public-Information / FOIA Requests (PIR/FOIA)
  1. Region C demand-modeling memos, including any references to "AI," "data centers," "industrial cooling," or "Matrix/MSB."
  2. TWDB feasibility drafts and internal emails about sequencing, alternatives, and contamination/cultural-resource concerns.
  3. TCEQ coal-ash, CCR, and contamination reports that differ from or exceed public-facing summaries.
  4. RRC routing analyses for pipelines (2020–2025) connecting to Hopkins and surrounding counties.
  5. MSB Global / SSDC1 economic incentive agreements and NDAs with TxEDC, Hopkins County, and Sulphur Springs EDC.
  6. TDA policy drafts and internal communications linking "water scarcity" narratives, agricultural valuation changes, and support for AI/pipeline/transmission corridors.

7. Local government NDAs, MOUs, and incentive term sheets for AI facilities, substations, and related corridor expansions.
3. Land-Record Pull & GIS Overlay Analysis
  1. Franklin, Titus, Red River, Delta, Morris, and Hopkins Counties.
  2. Identify all corridor-adjacent acquisitions by timber trusts, Hillwood, Hunt, Bass/CEM, and anonymized LLCs.
  3. Overlay:
    1. pipeline and transmission routes
    2. Marvin Nichols reservoir inundation and shoreline
    3. AI megahub site and planned infrastructure
    4. high-probability Caddo burial and sacred-site landscapes

#### **XII.1.4 Public-Interest, Tribal, and Treaty-Compliance Actions**

1. Notify Federally Recognized Tribal Governments
  1. Provide burial-threat maps, Section IX (Federal Kill-Shot Authorities), and Section II.7 / IX (Tribal & cultural impacts).
  2. Request immediate **federal consultation freeze** pending NHPA §106/NAGPRA/ARPA compliance.
2. Request DOI Oversight for Treaty and Trust Violations
  1. Document how reservoir inundation and corridor routing impair Caddo sacred lands and treaty-protected interests.
  2. Request DOI review of Texas agencies' failures to consult and protect burial grounds.
3. Prepare Affidavits and Declarations for Federal Cultural-Resource Injunctions
  1. ARPA, NHPA, NAGPRA, CERCLA, CWA, and Title VI civil-rights violations.
  2. Testimony from Tribal representatives, archaeologists, local landowners, and impacted school districts.

### **XII.2 INFORMATION GAPS – WHAT MUST BE VERIFIED**

These are the critical missing elements federal prosecutors and Texas Rangers will request. Filling them converts the INTSUM into an indictment-ready packet.

#### **XII.2.1 Hydrology & Contamination Gaps**

Independent third-party sampling confirming:

- Arsenic exceedances.
- Hexavalent chromium and other CCR markers.
- Boron, molybdenum, and related coal-ash plume migration.
- Groundwater flow direction into the Marvin Nichols footprint and downstream basins.
- Basin-scale maps tying contamination plumes to reservoir inundation and AI-node intake zones.

Documentary proof that TCEQ and TWDB possessed this data and either **withheld or minimized it** in public documents.

#### **XII.2.2 Cultural-Resource Gaps**

- GIS-verified burial-mound and sacred-site points inside the proposed footprint and corridor alignments.
- Written confirmation from Caddo Nation and other affected Tribes that they were **not adequately consulted** or fully informed of site-density data.
- Identification of archaeological consultants used by Freese & Nichols / Region C / TWDB and any undisclosed studies.
- Evidence of Phase I/II cultural-resource surveys that were completed but never surfaced in NHPA §106 reviews or public records.

### **XII.2.3 Financial, Donor & Policy Gaps**

Direct linkage between:

- Energy Transfer / pipeline PAC donations → RRC votes and routing approvals.

Direct linkage between:

- DFW utilities and Region C WPG voting behaviors and committee outcomes.

Donor clusters tied to:

- Hillwood/Perot, Hunt, Bass/CEM, timber trusts, and AI/tech PACs.

Documentary evidence of **revolving-door employment**:

- TWDB → Freese & Nichols / AECOM / other consultants.
- TCEQ → environmental-consulting firms serving corridor beneficiaries.
- RRC → pipeline or energy companies working on the corridor.

**TDA-specific gap:**

- Communications and policy shifts showing Sid Miller/TDA using “water scarcity,” corridor-centric rural “revitalization,” or valuation changes to normalize land seizure and infrastructure expansion.

### **XII.2.4 Planning & Administrative Record Gaps**

- Pre-decisional drafts of the TWDB feasibility declaration for Marvin Nichols, including tracked changes and internal comments.
- Region C internal emails and technical memos explicitly referencing AI/data centers or MSB/Matrix-type loads in “municipal” categories.
- TCEQ internal memos on coal-ash/RCRA issues, including any decision to downplay or omit data.
- RRC correspondence with operator attorneys (and lobbyists) about routing pipelines through reservoir and AI-corridor zones.
- TDA internal drafts of rule changes or initiatives affecting agricultural valuation, rural land designation, or infrastructure promotion in corridor counties.

### **XII.2.5 Local-Government & EDC Gaps**

- All NDAs, MOUs, and “confidentiality” agreements between MSB Global/SSDC1 and:
  - Hopkins County

- Sulphur Springs EDC
- Franklin County and other corridor counties
- Appraisal-district internal communications regarding land undervaluation before acquisition, then rapid revaluation for corridor use.
- PPP development agreements involving Hillwood, CEM, timber interests, and AI-aligned industrial users.
- Quiet-title actions, fast-tracked land transfers, and unusual timing of subdivision/platting near the footprint.

### **XII.3 REQUIRED EVIDENCE – PROSECUTORIAL CHECKLIST**

This is the evidence list Texas Rangers, DOJ, EPA-CID, ENRD, and USACE can use as a subpoena and records-freeze roadmap.

#### **XII.3.1 Documents Required**

1. Pipeline routing maps and engineering files (RRC + operator submissions, 2020–present).
2. Transmission expansion maps, planning studies, and substation siting records (ERCOT, Oncor, PUCT).
3. Reservoir engineering drafts and feasibility analyses (Freese & Nichols, FNI subcontractors).
4. TWDB hydrology, yield, and alternatives reports for Marvin Nichols and related projects.
5. Coal-ash contamination sampling and CCR compliance records (EPA, TCEQ, utilities).
6. Region C modeling spreadsheets and scenario analyses, including raw inputs and assumptions.
7. Mitigation-bank feasibility and siting plans for timber and landholding beneficiaries.
8. Land-acquisition records from county clerks and appraisal districts (deeds, plats, easements).
9. Campaign-finance cluster analyses (TEC, FEC, and IRS filings, plus PAC-to-PAC transfers).
10. Economic incentive agreements, tax abatements, and fee waivers (EDCs, TxEDC, counties, cities).
11. Burial and archaeological reports that were withheld or minimized in NHPA/NAGPRA filings.
12. TDA rulemaking drafts, internal memos, and public-facing guidance on rural valuations, “water scarcity,” AI/industrial corridors, and infrastructure “revitalization” programs.

#### **XII.3.2 Testimony Required**

1. Former TWDB staff willing to confirm **predetermination** and feasibility-before-evidence practices.
2. Region C staff or consultants willing to testify about **inflated projections** and concealed AI/industrial loads.
3. TCEQ staff or contractors who can confirm contamination suppression, data editing, or directive non-enforcement.
4. Archaeologists and cultural-resource professionals who can confirm burial-site data was **collected but not disclosed**.
5. Landowners subjected to coercive pipeline/eminent-domain tactics, undervaluation, or retaliatory regulatory behavior.
6. County and EDC staff involved in NDAs, incentive packages, appraisal manipulation, or corridor-favoring zoning decisions.
7. **TDA insiders or local officials** who can testify about Sid Miller’s office using agriculture/rural-development levers to normalize corridor projects and water-scarcity narratives.

#### **XII.3.3 Expert Opinions Required**

1. Hydrology expert familiar with NEPA/S404(b)(1) LEDPA standards and anti-segmentation doctrine.
2. Archaeologist specializing in Caddo and East Texas cultural landscapes and mortuary sites.
3. RCRA/CERCLA environmental scientist able to map CCR plumes and imminent hazards.
4. Public-corruption investigator experienced in RICO/honest-services/Hobbs Act patterns and consultant capture.
5. Infrastructure-economics/water-planning expert capable of proving **manufactured scarcity** and showing alternatives (reuse, conservation, non-reservoir options).

## **XII.4 BOTTOM-LINE FEDERAL CONSEQUENCE**

Once these gaps are filled and evidence categories assembled:

- You will have a fully mapped RICO predicate structure (enterprise, pattern, predicate acts, interstate commerce).
- You will have NHPA/NAGPRA/ARPA kill-shot evidence that independently halts the Corridor.
- You will have CWA/SDWA/NEPA/CERCLA/RCRA fatal deficiencies that bar federal permits.
- You will have fraud and influence patterns tying donors (including those aligned with TDA) to state approvals, land seizures, and manufactured scarcity.

You will have a complete administrative, environmental, and cultural record sufficient for injunctions and federal intervention.

At that point, Rangers, DOJ, EPA, and USACE will have no lawful discretion to ignore the Corridor's criminal, environmental, cultural, and public-trust violations. It becomes a mandatory multi-agency investigation and enforcement action, not a policy debate.